

## Center for Judicial Accountability, Inc. (CJA)

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**From:** Center for Judicial Accountability, Inc. (CJA) <elena@judgewidth.org>  
**Sent:** Monday, December 17, 2018 11:46 AM  
**To:** 'ad3clerksoffice@nycourts.gov'; 'Jane Landes'  
**Cc:** 'Brodie, Frederick'; 'Barbara.Underwood@ag.ny.gov'; 'Paladino, Victor';  
'Brian.Mahanna@ag.ny.gov'; 'Alvin.Bragg@ag.ny.gov'; 'Janet.Sabel@ag.ny.gov';  
'gary.brown@ag.ny.gov'; 'Matthew.Colangelo@ag.ny.gov';  
'Margaret.Garnett@ag.ny.gov'; 'manisha.sheth@ag.ny.gov'; 'Kent.Stauffer@ag.ny.gov';  
'Meg.Levine@ag.ny.gov'; 'Jeffrey Dvorin'; 'Adrienne Kerwin'; 'Helena.Lynch@ag.ny.gov'  
**Subject:** CJA v. Cuomo citizen-taxpayer appeal (#527081) -- appellants' reply affidavit in further support of osc (#4) to disqualify appeal panel for demonstrated actual bias, for certified questions to the Court of Appeals, etc.  
**Attachments:** 12-15-18-reply-affidavit-merged-compressed.pdf; 12-17-18-reply-aff-service.pdf; 12-17-18-aff-service-unsigned-signed.pdf

### TO: Appellate Division, Third Department Chief Motion Attorney Amy Conway

This follows my phone conversation with Devon at approximately 9:45 this morning. Herewith attached is my notarized December 15, 2018 reply affidavit, with notarized affidavit of service – as the original reply affidavit that I express mailed to the Court on Saturday, December 15th and mailed, first-class, to the attorney general, was not notarized, nor was an affidavit of service enclosed. I will send the originals to the Court, later today.

Please note that the attached reply affidavit corrects typos on page 2 and 8 of original – and replaces pages 5-10 of the Exhibit I “legal autopsy/analysis”, whose changes are the addition of record references. I will send these superseding pages to both the Court and the attorney general. Kindly replace. CJA’s webpage for the December 15, 2018 reply affidavit is here: <http://www.judgewidth.org/web-pages/searching-nys/budget/citizen-taxpayer-action/2nd/appeal/12-15-18-reply.htm>.

Additionally attached is an affidavit of service for BOTH the unsigned and signed order to show cause, with substantiating e-mail receipts, which I will get notarized later today before mailing to the Court. Inadvertently, on December 10<sup>th</sup>, I gave the notary an affidavit of service for only the unsigned order to show cause – which I have just realized now in preparing this e-mail for you. Apologies.

Thank you.

Elena Sassower, unrepresented plaintiff-appellant

On her own behalf, on behalf of the Center for Judicial Accountability, Inc., and on behalf of the People of the State of New York and the Public Interest.

914-421-1200

[www.judgewidth.org](http://www.judgewidth.org)

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**From:** Brodie, Frederick <Frederick.Brodie@ag.ny.gov>  
**Sent:** Friday, December 14, 2018 4:23 PM  
**To:** Center for Judicial Accountability, Inc. (CJA) <elena@judgewidth.org>  
**Cc:** Paladino, Victor <Victor.Paladino@ag.ny.gov>

**Subject:** RE: CLARIFICATION -- NOTICE: The AG' Duty to Withdraw your Dec. 10th opposing memorandum in CJA v.