



Cleveland-Marshall College of Law

1801 Euclid Avenue  
Cleveland, Ohio 44115-2223  
Telephone: (216) 687-2344  
FAX: (216) 687-6881

December 9, 1998

Ms. Elena Ruth Sassower  
P.O. Box 69  
White Plains, NY 10605-0069

Dear Elena:

Two points. First, a clarification: As the excerpt that you quote from my article states, it was (and remains) my view that the standard for recusal as spelled out in the statutes is "relaxed," but that the courts have not applied a relaxed standard; rather, they have applied--as I said in my letter--"too stringent a standard." Because the courts have imposed too stringent a test for litigants to satisfy, it is my view that some judges have declined to recuse themselves when they probably should. On that point, I thought we agreed.

Second, I promised to read your materials and respond to them in writing, which I have done. I did not promise to agree with your point of view, and as it turns out, we agree on some things, but not on others. The mere fact that we do not always agree gives me no cause to question your integrity, and gives you no cause to question mine. Never in my fifteen years of professional life has my "fitness" been questioned, and never have I been accused of being "disingenuous," let alone "profoundly, and repeatedly" so. I have no patience for name-calling, and see no point in corresponding further.

Sincerely,  
  
Charles G. Geyh

REC'D 12/15/98

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*Geyh*  
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**CSU Cleveland State University**

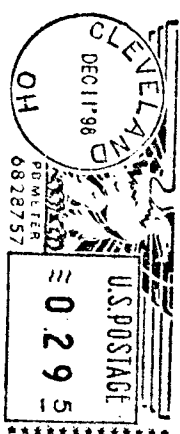
Cleveland-Marshall College of Law  
Office of the Dean  
1801 Euclid Avenue  
Cleveland, Ohio 44115-2223  
Geyh

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**RETURN SERVICE  
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