

COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

No. 04-CM-760
No. 04-CO-1600

Unopposed Motion
for a Procedural Order
Pursuant to Rule 27(b)(1)(A)
For an Extension of Time

ELENA RUTH SASSOWER,

Appellant.

v.

UNITED STATES OF AMERICA,

Appellee.

COUNTY OF WESTCHESTER)
STATE OF NEW YORK) ss:

ELENA RUTH SASSOWER, being duly sworn, deposes and says:

1. I am the appellant *pro se* in the above-numbered consolidated appeals and submit this motion for a procedural order pursuant to Rule 27(b)(1)(A) for an extension of time, until May 5, 2006, for the filing of my reply brief, currently due on April 5, 2006.

Such is without prejudice to my contention, already particularized¹, that this Court is disqualified for pervasive actual bias and interest and that these appeals must be transferred to the U.S. Court of Appeals for the District of Columbia.

2. Pursuant to Rule 27(b)(3), I contacted Assistant U.S. Attorney Florence Pan, who is handling these appeals for the government, and asked her consent for an

¹ See, my October 14, 2005 disqualification/transfer motion. Also, my unresponded-to January 10, 2006 letter to Chief Judge Washington and my February 22, 2006 judicial misconduct complaint against him and this Court's judges, *et al.* – annexed as Exhibits B and C to my accompanying March 16, 2006 motion for permission to file.

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extension to May 5, 2006. My March 15, 2006 letter to her is annexed (Exhibit A-1), as is her March 15, 2006 response, "I have no objection to your request for an extension" (Exhibit A-2).

3. The good and sufficient reasons for my requested extension are set forth by my March 15, 2006 letter. In the interest of economy, I incorporate them herein by reference.

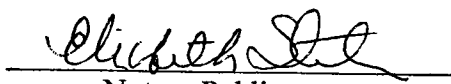
4. I would additionally note that the law library at the Westchester County Supreme Court, which is where I do my legal research, is closed for three weeks, from March 14, 2006 until April 4, 2006, due to renovations. Consequently, I will not even be able to research the legal authorities cited by Ms. Pan's appellee's brief until April 4, 2006, at the earliest.

5. This is the first such extension of time I have requested and I do not anticipate needing any further extensions.

WHEREFORE, I respectfully request an extension of time for the filing of my reply brief, to and including May 5, 2006.


ELENA RUTH SASSOWER

Sworn to before me this
16th day of March 2006


Notary Public

ELIZABETH STERKEN
Notary Public, State of New York
No. 4983687
Residing in Orange County
Commission Expires July 8, 2007

CENTER for JUDICIAL ACCOUNTABILITY, INC.

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March 15, 2006

Assistant U.S. Attorney Florence Pan
U.S. Department of Justice/District of Columbia
555 Fourth Street, N.W.
Washington, D.C. 20530

RE: *Elena Ruth Sassower v. United States of America*
#04-CM-760 & #04-CO-1600 ("Disruption of Congress" case)

Dear Ms. Pan:

I have received your Appellee's Brief and will be making a motion for a procedural order pursuant to Rule 27(b)(1)(A) to extend my time to reply from April 5, 2006 to May 5, 2006.

Such is necessitated by other work responsibilities, whose deadlines and timetables are throughout the coming weeks. This, added to my family commitments, most importantly, to my 81-year old father, George Sassower, who broke his hip on February 21st. – and for whom I am a primary caregiver. This past Monday, March 13th, and after a myriad of life-threatening complications, he was finally transferred from the hospital to a nursing home, where he is expected to remain for the next three weeks. We are praying for the success of the physical therapy he will be receiving, but it is a difficult, stressful period for him and the family. Needless to say, we are spending a great deal of time together and hoping we will be able to celebrate his 82nd birthday on April 3rd.

Since I have already served the maximum six-month jail sentence for the "disruption of Congress" charge of which I was convicted and paid the maximum \$500 fine and maximum \$250 assessment under the "Victims of Violent Crimes Compensation Act of 1981", there is no prejudice to the government by its consent to my requested extension. Moreover, as you know, I readily consented to your requests for extensions of time for your Appellee's Brief – and you ultimately had four months within which to prepare the Brief, to which I must now respond.

Please confirm, as soon as possible that you do consent so that I can make the appropriate motion to the Court.

Yours for a quality judiciary,



ELENA RUTH SASSOWER, Appellant *Pro Se*

EX A-1



U.S. Department of Justice

Kenneth L. Wainstein
United States Attorney

District of Columbia

Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530

March 15, 2006

VIA FACSIMILE (914-428-4994)

Elena Ruth Sassower
Center for Judicial Accountability, Inc.
P.O. Box 8220
White Plains, NY 10602

Re: Elena R. Sassower v. United States,
Appeal Nos. 04-CM-760, 04-CO-1600

Dear Ms. Sassower,

I have received your letter dated March 15, 2006, regarding your need for an extension of time in which to file your reply brief in the above-captioned cases. I have no objection to your request for an extension.

Sincerely,

Florence Pan
Assistant United States Attorney

EX A-2