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May 1, 2006

LAW DAY

George Freeman, Assistant General Counsel
The New York Times Company
229 West 43rd Street
New York, New York 10036

RE: NOTICE OF INTENT TO SEEK SANCTIONS AGAINST YOU
Sassower, et al. v. The New York Times Company, et al.
Westchester Co. Index #05-19841

Dear Mr. Freeman:

This follows up my April 17th letter requesting your consent to a 30-day adjournment of your April 13th motion to dismiss the verified complaint in the above-entitled action, returnable May 8th – to which your April 18th letter consented.

Please be advised that your dismissal motion cannot be adjourned for a month, as it is not on any court calendar. As may be seen from the enclosed print-out from the Westchester County Clerk's Office, you did not file your motion – nor, prior thereto, purchase a request for judicial intervention (RJI), which you were required to do, before serving it, as the first party making a motion. Based on what I have been told by personnel at the Clerk's Office and by the attorney available to *pro se* litigants, it would appear that your motion is a nullity – and that, technically, you are in default.

I hereby give you notice that should you now purchase an RJI and move to be relieved of the default arising from your procedurally-defective April 13th dismissal motion, I will cross-move for sanctions against you pursuant to NYCRR §130-1.1 and Judiciary Law §487 and for an order referring you to disciplinary authorities for your knowing and deliberate violation of New York's Disciplinary Rules of the Code of Professional Responsibility, NYCRR §1200.3 [DR 1-102: "Misconduct"] and §1200.33 [DR 7-102: "Representing a Client Within the Bounds of the Law"].

The reason for this should be obvious to you. From beginning to end, your motion to dismiss the complaint for failure to state a cause of action pursuant to CPLR §3211(a)(7) is fashioned on flagrant falsification and material omission of the complaint's pleaded allegations and on law either inapplicable by reason thereof or itself falsified by your motion. Indeed, your dismissal motion is nothing less than a fraud on the court. This includes your supporting affidavit which –

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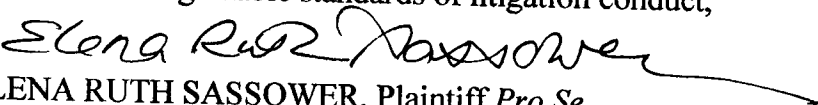
in contravention of the standard governing motions to dismiss for failure to state a cause of action – annexes, as Exhibit A, what it purports to be “a portion of the transcript of Confirmation Hearings on Federal Appointments before the U.S. Senate Judiciary Committee of May 22, 2003 at which Ms. Sassower was arrested” – but which, in fact, are the final two pages of the Senate Judiciary Committee's June 25, 1996 confirmation hearings, obtained from CJA's website.

Be advised that I am prepared to waive your default -- but only to allow defendants to answer the verified complaint. Such answer should be by counsel who is not, as you are, among the defendant DOES 1-20 and thereby disqualified for interest and susceptible to discipline for violation of NYCRR §1200.20 [DR 5-101: “Refusing Employment When the Interests of the Lawyer May Impair Independent Professional Judgment”].

Please promptly advise by fax (914-428-4994) and e-mail (elenaruth@aol.com) so that I may know how to proceed.

Thank you.

Yours for a quality judiciary, responsible journalism,
& cognizable standards of litigation conduct,


ELENA RUTH SASSOWER, Plaintiff *Pro Se*

cc: Eli Vigliano, Esq.

Items filed in the case book:

Case Book	Date	Defendant Name	Plaintiff Name	Comment Action
19841-05	2006/03/30	COMPLAINT		89
19841-05	2006/03/16	AFFIDAVIT OF SERVICE		03
19841-05	2006/03/03	AFFIDAVIT OF SERVICE		03
19841-05	2005/11/04	NEW YORK TIMES CO	SASSOWER ELENA R	00
19841-05	2005/11/04	SUMMONS & NOTICE		01