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By Courier

March 5, 1996

Judge John E. Sprizzo
United States District Court
U.S. Courthouse
40 Centre Street
New York, New York 10007

Re: Sassower v. Mangano, et al.
94 Civ. 4514 (JES)

Dear Judge Sprizzo:

Following my February 23, 1996 letter to the Court, I received a telephone call from your appointments secretary, Linda Kotowski, on Monday, February 26, 1996. She informed my daughter, Elena, who took the call in my absence, that the Court was giving me until that Friday, March 1, 1996, to make any motion I cared to make. My daughter inquired as to the reason for such arbitrary deadline, asking whether the Attorney General was likewise so limited in connection with the making of the sanctions motion he had stated he was planning to make against me, as detailed in my February 23rd letter. Ms. Kotowski told my daughter that she would telephone back the following day, after speaking with the Court.

The next day, February 27th, Ms. Kotowski telephoned with the news that the Court was giving both sides until March 8, 1996 to make any motions they wished to make. I reminded Ms. Kotowski that I had written three letters to the Court--all of which were still unanswered--and asked when I could expect a response from the Court, which I told her could obviate motions by both sides. Ms. Kotowski stated that the Court only answers letters it deems "worthy of response". When I asked, in shock, whether she was saying that the Court deemed my letters "unworthy of response", Ms. Kotowski shot back that I could draw my own conclusions.

If this Court seriously views my December 27, 1995, February 9, 1996, and February 23, 1996 letters to this Court--and my pending Order to Show Cause for a Preliminary Injunction, filed on September 26, 1995--to be "unworthy of response", then the only conclusion that can be drawn is that the Court is either incompetent or biased to a degree causing it to deliberately misrepresent the significance of what is before it.

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EX "F"

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By those four documents, the Court has been apprised of an emergency situation, demanding immediate intervention to protect my constitutionally-guaranteed rights from continued obliteration.

The record before the Court could not be clearer. The unrefuted evidence before it demonstrates my absolute entitlement to injunctive relief, as well as to summary judgment in my favor and monetary and disciplinary sanctions against the Attorney General and his clients. This is highlighted by my October 27, 1995 Affidavit in Further Support of a Temporary Injunction and for Sanctions Pursuant to FRCP 56--referred to in my December 27, 1996 letter to this Court. A copy is annexed as Exhibit "A" for the Court's convenience.

From the record--including my most recent letters--the Court is well aware that I am being irreparably injured by its deliberate failure and refusal to act--and that the judicial defendants have been encouraged to continue, unrestrained, their malicious violations of my federally-guaranteed constitutional rights.

Since my February 23, 1996 letter to this Court, the severe pressures and intimidation to which my attorney in the Valley v. Sassower appeal, Richard Sussman, Esq., has been subjected by the judicial defendants' biased and abusive conduct, has resulted in his tendered resignation and intended withdrawal from that appeal (A.D. #94-06242), as well as from a separate but related action in the Westchester Supreme Court under Index No. 19501/93. A copy of Mr. Sussman's March 1, 1996 letter to me is annexed as Exhibit "B" and my response thereto, faxed to the judicial defendants on March 4, 1996, are annexed as Exhibit "C".

As a result, I am besieged by ever-increasing new pressures--which have taken their toll on me physically. This includes losing the use of my right hand for the next month, due to recurrence of a medical condition called stenosing tenosynovitis of my right fourth finger, popularly known as "trigger finger". I have been directed by my physician to avoid repetitive hand motions, such as those used in typing. Annexed as Exhibit "D" is a copy of a note, dated March 4, 1996, from my doctor confirming the aforesaid instructions.

Under the circumstances, I respectfully request that this letter be accepted, in lieu of a formal motion, as a renewal of my October 26, 1995 motion for this Court's recusal by reason of its manifest bias and deliberate disregard of its judicial duties.

Judge John Sprizzo

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Should that not be acceptable to the Court in form, I would appreciate prompt telephone notification so that alternative arrangements can be made without further delay.

Very truly yours,


DORIS L. SASSOWER

DLS/er
Enclosures

cc: Hon. Thomas P. Griesa, Chief Judge (S.D.N.Y.)
Assistant Attorney General Weinstein