

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Thurgood Marshall United States Courthouse
40 Foley Square, New York NY 10007
212.857.8585

RAYMOND J. LOHIER, JR.
CHIEF JUDGE

CATHERINE O'HAGAN WOLFE
CLERK OF COURT

August 14, 2026

Lidia M. Orrego
95-08 Queens Blvd., Apt. 3E
Rego Park, NY 11374

Re: *Judicial Conduct Complaint*, 02-26-90052-jm

Dear Ms. Orrego:

We hereby acknowledge receipt of your judicial complaint received and filed as of the date received, August 11, 2026.

The complaint has been filed under the above-referenced docket number and will be processed pursuant to the Judicial Conduct and Disability Act of 1980, 28 U.S.C. § 351-364 (2006), and the *Rules for Judicial-Conduct and Judicial-Disability Proceedings*.

You will be notified by letter once a decision has been filed.

Very truly yours,

Catherine O'Hagan Wolfe, Clerk of Court

By: 
Tiana Harris
Deputy Clerk

Complaint of Judicial Misconduct Related to Pending Judicial Conduct
Complaint Nos. 02-25-90131-jm and 02-25-90132-jm)

Judicial Council of the Second Circuit

COMPLAINT OF JUDICIAL MISCONDUCT OR DISABILITY

To begin the complaint process, complete this form and prepare the brief statement of facts described in item 4 (below). The RULES FOR JUDICIAL-CONDUCT AND JUDICIAL-DISABILITY PROCEEDINGS, adopted by the Judicial Conference of the United States, contain information on what to include in a complaint (Rule 6), where to file a complaint (Rule 7), and other important matters. The Rules are available in federal court clerks' offices, on individual federal courts' websites, and on www.uscourts.gov.

Your complaint (this form and the statement of facts) should be typewritten and must be legible. For the number of copies to file, consult the local rules or clerk's office of the court in which your complaint is required to be filed. Enclose each copy of the complaint in an envelope marked "COMPLAINT OF MISCONDUCT" or "COMPLAINT OF DISABILITY" and submit it to the appropriate clerk of court. **Do not put the name of any judge on the envelope.**

1. Name of Complainant: Lidia M. Orrego
 Contact Address: 9508 Queens Blvd. Apt. 3E
Rego Park, NY 11374

Daytime telephone: (347) 453-2234

2. Name(s) of Judge(s): Sanket J. Bulsara
 Court: United States District Court Eastern District of New York

3. Does this complaint concern the behavior of the judge(s) in a particular lawsuit or lawsuits?

☒ Yes ☐ No

If "yes," give the following information about each lawsuit:

Court: United States District Court Eastern District of New York

Case Number: 20cv3361 Reassigned PKC-MEK Since November 17, 2025

Docket number of any appeal to the Second Circuit: Dkt 26-899; Dkt 25-1576

Are (were) you a party or lawyer in the lawsuit? Dkt 25-1802; 25-1810; 25-2399 among others

☒ Party ☐ Lawyer ☐ Neither

If you are (were) a party and have (had) a lawyer, give the lawyer's name, address, and telephone number:

N/A

Judicial Council of the _____ Second _____

Circuit

RECEIVED

COMPLAINT OF JUDICIAL MISCONDUCT OR DISABILITY

NOV 11 AM 8:57

U.S. COURT OF APPEALS
SECOND CIRCUIT
NIGHT DEPOSITORY

4. **Brief Statement of Facts.** Attach a brief statement of the specific facts on which the claim of judicial misconduct or disability is based. Include what happened, when and where it happened, and any information that would help an investigator check the facts. If the complaint alleges judicial disability, also include any additional facts that form the basis of that allegation.

5. **Declaration and signature:**

I declare under penalty of perjury that the statements made in this complaint are true and correct to the best of my knowledge.

Signature: _____



Date: 08/10/2026

NOTE REGARDING SUPPORTING EXHIBITS AND SUPPLEMENTAL RECORD

Pursuant to Rule 2(e) of the Rules for Judicial-Conduct and Judicial-Disability Proceedings, Complainant submits the original and four copies of this Complaint and Statement of Facts. Rule 2(e) provides that one copy of supporting transcripts, exhibits, or other documents is sufficient.

Accordingly, the original Complaint is submitted as the complete master filing and includes one complete set of Exhibits 1–12, together with the digital evidence identified as Exhibit 10, Disc 1 of 2 and Disc 2 of 2, and the Supplemental Record (“SR”) materials, SR-1 through SR-5.

The four additional copies contain the Complaint, five-page Statement of Facts, Exhibit Index, accompanying reference sections, and SR-1 through SR-5, but do not duplicate Exhibits 1–12 or the digital media.

The SR materials are provided in each filing copy solely as an organizational and documentary roadmap for ease of review. They do not constitute additional numbered exhibits and do not alter or renumber Exhibits 1–12.

STATEMENT OF FACTS — Complaint dated August 10, 2026

Attachment to Official Complaint Form — 28 U.S.C. § 351 et seq.; Rule 2(b) — Concerning Hon. Sanket J. Bulsara, U.S.D.J., E.D.N.Y. — Related to Nos. 02-25-90131-jm, 02-25-90132-jm

I, Lidia M. Orrego, submit this Complaint concerning the conduct of recused United States District Judge Sanket J. Bulsara in Orrego v. Knipfing, et al., EDNY Case No. 2:20-cv-03361. This Complaint is based on the official District Court and appellate records, the summary-judgment record, the June 24, 2026 Motion to Vacate and supporting papers, and the documentary and electronic evidence submitted to the Court. The misconduct documented below is not based merely on disagreement with a judicial ruling. It concerns suppression, omission, selective treatment, and misrepresentation of material evidence; false factual statements contradicted by the filed record; denial of a meaningful opportunity to submit and cure electronic evidence; substantive judicial acts after recusal; and restrictions on my access to the Court. (Exs. 1–12; Ex. 6, Master Evidence Map; Ex. 7, Visual Map; Ex. 10, Digital Evidence; MC DE [6].) The Master Evidence Map specifically identifies evidence from DE [224], DE [226], and DE [228] and compares its treatment in DE [244].

1. Recusal and Subsequent Exercise of Judicial Authority. On November 17, 2025, Judge Bulsara entered an Order of Recusal and Random Reassignment, transferring the case to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.” Nevertheless, on May 8, 2026—172 days after recusal—purported acts docketed as DE [244] and DE [245] were entered under the former SJB-AYS designation. The same day, Miscellaneous Case No. 2:26-mc-01957-SJB was opened, three submissions I filed on May 5 were removed from the 20-cv-3361 docket, and the miscellaneous proceeding was immediately administratively terminated. DE [244] then stated no supplemental evidence was in the record. (Ex. 1; Ex. 2, DE [244]–[245]; Exs. 3–5; Ex. 9; MC DE [6]; SR-1; SR-2.)

2. The Summary-Judgment Record Differed Materially From DE [244]'s Narrative. My submissions in DE [224], DE [224-2], DE [226], DE [228], and DE [229] contained contemporaneous texts, emails, recordings, certified transcripts, photographs, videos, affidavits, investigative reports, employment and payroll records, judicial determinations, and other documentary evidence. The 180-page Exhibit 6 maps that evidence against DE [244]'s statements, including DE [30]; the Uzcategui/Rydan investigation; the November 27, 2018 termination letter; Old Westbury, LLC evidence; Zantua/James-Knipfing texts; payroll records; NDA evidence; and the electronic-evidence history. Material contrary evidence was omitted, selectively quoted, or mischaracterized. (Ex. 2; Ex. 6, pp. 1–180; Ex. 7; Ex. 10; EDNY DE [30], [224], [224-2], [226], [228], [229].)

3. DE [244] fn.9 stated the record did not support that Teresa A. Zantua directed photographs inside the Knipfing residence, notwithstanding her October 19, 2018 text—“Lidia will u take picture of the apple juice so I can get more please”—filed at DE [224-16], p. 52, PageID #13478 (Ex. 21). The Master Evidence Map identifies that document and two additional instructions directly contradicting fn.9. (Ex. 2, DE [244] fn.9; Ex. 6; EDNY DE [224-16], Ex. 21.)

4. DE [244] characterized electronic evidence it admitted it could not review. My July 2–8, 2025 FTP-link requests and DE [202] (Notice of Request to Submit Electronic Evidence) appear in Exhibit 6. The Court's July 2025 direction recognized Individual Practices § II.D as applicable to large electronic files in motion practice such as summary judgment. I ultimately filed the evidence physically as DE [229]. No notice of any deficiency or opportunity to cure was given before disposition. (Ex. 2, DE [244] fn.7; Ex. 6, DE [202], July 2025 docket directives; Ex. 10; EDNY DE [202], [229].)

5. DE [244]'s finding is internally irreconcilable: it characterized the electronic evidence as “largely duplicative” while acknowledging the Court was “unable to review it.” The Motion to Vacate identifies this contradiction—evidence cannot be substantively compared and found duplicative through an examination that admittedly never occurred. The record identifies 821 photographs, 172 videos, and 26 audio recordings, with related transcripts and other ESI. (Ex. 2, DE [244] fn.7; Ex. 6; Ex. 7; Ex. 10, Disc 1–2; EDNY DE [229].)

6. DE [244] omitted the controlling significance of Judge Gary R. Brown's prior Memorandum and Order, DE [30], while reaching materially different conclusions on the same issues—Zantua's supervisory role, prior complaints, harassment claims, the November 2, 2018 complaint, retaliation, termination, and hostile-work-environment claims. Exhibit 6 identifies six material areas of inconsistency, including the Faragher/ Ellerth defense, prior complaints, Zantua's supervisory status, and the Old Westbury, LLC termination letter, without DE [30] being cited anywhere in DE [244]'s 29 pages. (Ex. 2; Ex. 6, DE [30] and Master Evidence Map; EDNY DE [30], [224], [226], [228].)

7. DE [244] did not adjudicate my submissions through the record required by Rule 56. I filed a substantive Opposition (DE [224]), Local Rule 56.1 Counterstatement (DE [224-2]), my own Motion for Summary Judgment (DE [226]), and supporting documentary (DE [228]) and electronic (DE [229]) evidence identifying disputed and undisputed material facts with citations. DE [244] did not meaningfully address my Opposition, separately analyze my own motion, or resolve the disputes identified in my 56.1 submissions; material portions of the record were instead omitted, disregarded, selectively cited, or mischaracterized, as shown document-by-document in the Master Evidence Map. (Ex. 2; Ex. 6; Ex. 7; EDNY DE [224], [224-2], [226], [228], [229].)

8. This failure was consequential under Rule 56(c)–(e), governing citation to and treatment of supporting materials. My submissions directed the Court to texts, emails, photographs, videos, recordings, certified transcripts, affidavits, investigation records, and employment/payroll documents. Exhibit 6 demonstrates that material evidence corresponding to my factual statements was already in the record; DE [244] nonetheless resolved summary judgment without addressing substantial portions of that showing and, in multiple instances, stated evidence was absent where the cited record contained evidence on point. (Ex. 2; Ex. 6; Ex. 7; Ex. 10; EDNY DE [224], [224-2], [226], [228], [229].)

9. The Rydan Security investigation was selectively treated. The November 21, 2018 Rebecca Lugo-Uzcategui interview reported that conditions improved after Uzcategui approached Kevin Knipfing aka Kevin James about Zantua's conduct, but “REVERTED BACK” a short time later. DE [244] relied on the initial improvement while omitting the reversion, and disregarded that Uzcategui's earlier complaint predated my January 31, 2018 employment and therefore could not constitute corrective action responsive to my November 2, 2018 complaint. (Ex. 2; Ex. 6, Rydan/Uzcategui Interview and Master Evidence Map; EDNY DE [30], [224], [226], [228].)

10. The record concerning Old Westbury, LLC contradicts DE [244]'s narrative. Exhibit 6 includes the November 27, 2018 termination letter on “Old Westbury, LLC” letterhead signed by Steve Savitsky as “Business Manager”; DE [17], the September 30, 2020 Stipulation identifying Old Westbury, LLC as a represented Defendant; and DE [22], the December 11, 2020 Motion to Dismiss identifying it among represented moving Defendants. A November 17, 2025 GRSM submission to the Second Circuit nonetheless stated counsel had not identified Old Westbury LLC as represented because “no such entity exists.” (Ex. 6, termination letter, DE [17], DE [22], Nov. 17, 2025 appellate correspondence, Master Evidence Map; EDNY DE [17], [22], [30], [224], [226], [228].)

11. The record also contradicts the characterization that my recordings and photographs were simply obtained secretly or in violation of an NDA. The July 5, 2022 discovery directive required exchange of recordings and videos “regardless of how a party came into possession of them”; Kevin Knipfing was present during the October 23, 2018 recording; and the first NDA was delivered November 1, 2018—approximately nine months after my employment began and after most of the 821 photographs, 172 videos, and 26 audio recordings had already been created. (Ex. 2, DE [244]; Ex. 6, July 5, 2022 directive, NDA evidence, Master Evidence Map; Ex. 10.)

12. These omissions consistently favored Defendants while evidence supporting my claims—contemporaneous texts, emails, diary entries, investigative reports, photographs, videos, recordings, affidavits, and business records—was excluded from the factual narrative. This is especially serious because the principal Defendant is Kevin Knipfing aka Kevin James, a wealthy Hollywood actor represented by sophisticated counsel, while I proceeded pro se, raising whether this pattern is compatible

with the duty to administer justice “without respect to persons, and do equal right to the poor and to the rich.” 28 U.S.C. § 453. (Exs. 1–12, particularly 2, 6, 7, 11, 12; EDNY DE [30], [224], [224-2], [226], [228], [229], purported [244], [245].)

13. The filing injunction was imposed without the process ordinarily required before restricting a litigant's court access. DE [244] imposed a district-wide filing injunction simultaneously with disposing of summary judgment; the Motion to Vacate identifies that no separate notice, evidentiary hearing, or meaningful opportunity to respond was provided, and that DE [244] relied on appeals, mandamus petitions, recusal matters, and misconduct complaints to characterize me as vexatious. Judge Bulsara's 2025 Federal Bar Council Quarterly profile described oral argument as an opportunity for “a better understanding and a level of depth,” framed in terms of prepared “lawyers” and “counsel”—notable when compared with my actual opportunity to be heard as a pro se litigant. (Ex. 2; Exs. 3–5; Ex. 7; Ex. 9; SR-1; SR-2; SR-5; EDNY DE [224], [224-2], [226], [228], [229].)

14. Three authorized filings I placed in 20-cv-3361 on May 5, 2026 were moved into Miscellaneous Case No. 2:26-mc-01957-SJB when opened on May 8, 2026, and that case was administratively closed the same day. DE [244], entered the same date, thereafter stated no supplemental evidence was in the record. The official miscellaneous docket confirms filings continued to be docketed there, including my June 24, 2026 Rule 60 Motion at MC DE [6], despite the case being marked closed on May 8. (Ex. 2; Exs. 3–5; Ex. 9, Official Miscellaneous Docket; SR-1; SR-2.)

15. My June 24, 2026 Motion to Vacate presented these matters through the available procedure while appellate proceedings were pending, seeking relief under Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with an indicative ruling under Rule 62.1, supported by my Affirmation, Memorandum of Law, documentary exhibits, the Master Evidence Map, and the electronic evidence. It identified the challenged statements in DE [244] and compared them to the corresponding record evidence. (Ex. 3, Notice of Motion; Ex. 4, Affirmation; Ex. 5, Memorandum of Law; Ex. 6; Ex. 10; Ex. 9, MC docket.)

16. The Motion to Vacate documents a four-step exclusion chain: (1) my July 2–8, 2025 FTP-link requests under Individual Practices § II.D; (2) subsequent termination of the remaining Pro Se electronic-filing mechanism; (3) my physical filing of the flash drive as DE [229], retained without notice of any technical problem; and (4) DE [244]'s first disclosure that the Court could not review the files, while characterizing the evidence as “largely duplicative.” (Ex. 2, DE [244] fn.7; Ex. 6, FTP requests, DE [202], July 7–8 orders, DE [229] history; Ex. 10.)

17. I was directed not to contact Chambers while the Court's own procedure required communication to obtain the FTP transmission link for large electronic evidence. Exhibit 6 contains my repeated requests, DE [202], and the July 7–8, 2025 directives referencing Individual Practices § II.D as the mechanism for large electronic files in motion practice, while simultaneously directing that Chambers contact cease except through authorized channels. I followed the prescribed mechanism, received no usable route to complete the submission, and was later faulted in DE [244] despite the documented requests. (Ex. 6, electronic-evidence submission history, July 7–8, 2025 directives; Ex. 2, DE [244] fn.7; Ex. 10.)

18. The pattern continued after recusal through the handling of my Rule 60 filings and related appellate proceedings. My June 24 Motion was docketed in the already-closed miscellaneous proceeding rather than the reassigned civil action. I notified the Second Circuit and sought abeyance while the District Court addressed the pending Rule 60 Motion and Rule 62.1 request. Exhibit 8 documents that history; Exhibit 9 shows the miscellaneous docket through MC DE [17]. The Motion to Vacate remained unresolved while related appellate proceedings continued. (Ex. 8; Ex. 9; SR-2; SR-3, DE [240]/USCA 26-899; SR-4, DE [246]/USCA 26-1576.)

19. Exhibit 11, previously filed as DE [224-41], reproduces Judge Bulsara's March 6, 2024 Senate Judiciary Committee confirmation hearing, during which Senator John Kennedy questioned a prior judicial decision criticizing his treatment of District precedent, stating he had ignored a “large collection of cases in this District” and “a whole line of cases.” Judge Bulsara responded by referring to a split of

authority at the district-court level. This prior, independently documented questioning is relevant alongside DE [244]'s failure to address DE [30] and the authorities identified in my Motion to Vacate. (Ex. 11; EDNY DE [224-41].)

20. Exhibit 12, Judge Bulsara's Official Questions for the Record from his 2024 nomination, invokes the judicial oath to administer justice “without respect to persons, and do equal right to the poor and to the rich,” and represents that a judge must faithfully and impartially apply governing Supreme Court and Second Circuit law. Asked whether a district judge may “circumvent, evade, or undermine” applicable precedent, his answer was “No.” (Ex. 12; 28 U.S.C. § 453.)

21. Exhibit 12 further states that impartiality is central to the judicial oath and that decisions must rest on legal principles rather than a desired result, and that an expressed willingness not to follow precedent could indicate a judge had “pre-determined or prejudged cases.” Measured against that standard, the 20-cv-3361 record shows evidence favorable to me omitted, disregarded, selectively cited, or mischaracterized; DE [30] unaddressed in DE [244]'s 29 pages; unreviewed electronic evidence characterized as duplicative; and substantive acts entered 172 days after recusal. (Ex. 12; Exs. 1–7, 10–12; EDNY DE [30], [224], [224-2], [226], [228], [229], purported [244], [245]; 28 U.S.C. §§ 453, 455.)

22. This unequal treatment is especially serious given the conflict involving Defendants' counsel and Pasternack Tilker Ziegler Walsh Stanton & Romano LLP, my former attorneys, and the disparity between a pro se litigant and a wealthy Hollywood actor represented by powerful counsel. Material evidence favorable to me was excluded from the factual narrative while Defendants' version was repeatedly accepted. (Exs. 2, 4–7, 10, 12; EDNY DE [224], [224-2], [226], [228], [229]; MC DE [6]; 28 U.S.C. § 453.)

23. The Master Evidence Map places specific statements in DE [244] beside the documents contradicting them: the Zantua photograph instruction; the complete Rydan/Uzategui “reverted back” account; the Old Westbury, LLC documentary history; authorization and use of photographs/recordings; NDA timing and scope; payroll/overtime evidence; certified transcripts; and electronic evidence characterized despite admitted non-review. The June 24, 2026 Motion to Vacate invoked Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), including fraud upon the Court. (Ex. 2; Ex. 6; Ex. 7; Ex. 10; EDNY DE [224], [224-2], [226], [228], [229]; Fed. R. Civ. P. 56.)

24. No judicial order vacated the November 17, 2025 recusal transferring the case to Judge Chen and Magistrate Judge Merkl “for all further proceedings.” DE [244] and DE [245] were nonetheless entered 172 days later, on May 8, 2026. My Motion to Vacate challenges these acts as void and records that the November 26, 2025 change back to the SJB-AYS docket designation was a clerk notation, not a judicial ruling vacating recusal. (Ex. 1; Ex. 2; Exs. 3–5; Ex. 6; SR-1; SR-3, DE [240]/USCA 26-899; SR-4, DE [246]/USCA 26-1576.)

25. This post-recusal conduct is preserved in separate appellate proceedings: DE [240], Notice of Motion to Recuse, is the subject of Second Circuit Appeal No. 26-899; DE [246], Notice of Appeal from DE [244]–[245], is the subject of Appeal No. 26-1576. I notified the Second Circuit of the June 24, 2026 Motion to Vacate and sought abeyance while the District Court addressed the Rule 60 Motion and Rule 62.1 request. (Ex. 8; Ex. 9; SR-3, DE [240]/USCA 26-899; SR-4, DE [246]/USCA 26-1576; MC DE [6].)

26. In sum, the documentary record demonstrates: (1) non-adjudication of my Opposition (DE [224]) and Rule 56.1 Counterstatement (DE [224-2]); (2) failure to separately adjudicate my own Motion for Summary Judgment (DE [226]); (3) unresolved material factual disputes under Rule 56; (4) omission, disregard, or mischaracterization of documentary evidence (DE [228]) and electronic evidence (DE [229]); (5) statements in DE [244] contradicted by the record, including my repeated electronic-evidence upload requests; (6) the duplicative/unreviewable contradiction, without notice or opportunity to cure; and (7) substantive acts docketed as DE [244]–[245] after the November 17, 2025 recusal. (Exs. 1–2, 6–7, 10; EDNY DE [224], [224-2], [226], [228], [229], purported [244]–[245].)

27. Exhibits 11 and 12 place this conduct in context directly relevant to judicial integrity. Exhibit 11 (DE [224-41]) contains the 2024 Senate Judiciary Committee questioning by Senator John Kennedy concerning Judge Bulsara's disregard of District precedent; Exhibit 12 contains his own written responses recognizing that a district judge may not “circumvent, evade, or undermine” controlling precedent. (Ex. 11, DE [224-41]; Ex. 12.)

28. Judge Bulsara expressly represented to the Senate Judiciary Committee the § 453 obligation to administer justice “without respect to persons, and do equal right to the poor and to the rich.” I proceeded pro se against Kevin Knipfing aka Kevin James and other Defendants represented by powerful counsel, amid the Pasternack Tilker conflict. The documentary evidence shows material evidence favorable to me omitted, disregarded, selectively cited, or mischaracterized while propositions favorable to Defendants were accepted or repeated. (Exs. 2, 4–7, 10–12; EDNY DE [30], [224], [224-2], [226], [228], [229]; MC DE [6]; 28 U.S.C. § 453.)

29. This Complaint does not ask the Council to substitute itself for an appellate court or determine whether summary judgment was legally correct. It asks whether a recused judge continued exercising substantive judicial authority; whether material evidence was suppressed, disregarded, or mischaracterized; whether contradicted statements were used in the disposition; whether unreviewed evidence was characterized substantively; whether my documented efforts to submit electronic evidence were disregarded while I was restricted from contacting Chambers; whether filings were removed into an administratively terminated proceeding; and whether a filing injunction blocked further evidence and judicial review. (Exs. 1–12; SR-1–SR-4.)

30. Judge Bulsara represented that empathy toward a party should play “None” in judicial decision-making and that an attorney's race or sex should have “No” effect on access to oral argument or argument time. (Ex. 12.) The record permits the Council to compare those representations with the unequal treatment, suppression, omission, and mischaracterization documented in Exhibits 1–12 and the official record incorporated by reference, including his publicly stated approach to oral argument compared with my actual opportunity to be heard as a pro se litigant. (Exs. 2, 6, 7, 10, 12; EDNY DE [224], [224-2], [226], [228], [229]; SR-5.)

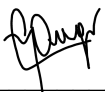
31. I respectfully request an independent investigation under 28 U.S.C. §§ 351–364 and review of the complete documentary record rather than the factual narrative in DE [244]. This Statement is accompanied by Exhibits 1–12, including the corrected Master Evidence Map, representative documentary evidence, the Visual Map, official court records, Judge Bulsara's Senate materials, and the two DVDs identified as Exhibit 10, together with Supplemental Record materials SR-1 through SR-5 identifying the relevant District Court and appellate records. (Exs. 1–12; SR-1–SR-5; EDNY 20-cv-3361; EDNY 26-mc-01957-SJB; Second Circuit Nos. 26-899, 26-1576.)

Judicial Duties Violated: Canons 1, 2A, 3A(1), 3A(3), 3A(4), and 3C of the Code of Conduct for United States Judges; 28 U.S.C. §§ 453 and 455; Fed. R. Civ. P. 56(a), (c), (e), and 60(b)(3)–(4), (6), 60(d)(3), and 62.1; Fed. R. App. P. 12.1; *Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847 (1988); *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). These violations concern the integrity, impartiality, and administration of justice—not the correctness of any discretionary ruling—and are cognizable under 28 U.S.C. § 351(a).

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Dated: August 10, 2026

Respectfully submitted,



Lidia M. Orrego
Plaintiff-Complainant, Pro Se

EXHIBIT INDEX

Complaint of Judicial Misconduct

Related to Pending Judicial Conduct Complaint Nos. 02-25-90131-jm and 02-25-90132-jm

28 U.S.C. §§ 351–364

Complainant: Lidia M. Orrego

Judicial Officer: Hon. Sanket J. Bulsara

District Case:

Orrego v. Knipfing, et al.

United States District Court

Eastern District of New York

Case No. **2:20-cv-03361**

Related Miscellaneous Proceeding

Case No. **2:26-mc-01957-SJB**

Ex.	Document / Date / Docket Reference	Contents / Relevant Parts	Purpose and Relevance to Complaint
1	Order of Recusal and Random Reassignment — November 17, 2025 — EDNY No. 2:20-cv- 03361	Order by which Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields recused, followed by random reassignment to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.”	Establishes the controlling date of recusal and reassignment. Serves as the jurisdictional benchmark for comparing the substantive purported acts subsequently docketed as DE [244] and DE [245] on May 8, 2026, 172 days after recusal.
2	Post-Recusal Purported Acts Docketed as DE [244] and DE [245] — May 8, 2026 — EDNY No. 2:20-cv-03361	Complete 29-page DE [244] and related DE [245]. Contains the summary-judgment disposition, factual findings, treatment of Plaintiff's evidence and electronic evidence, and filing injunction challenged in this Complaint.	Provides the complete text of the principal post-recusal purported acts at issue. Permits direct statement-to-evidence comparison with Plaintiff's Rule 56 submissions, Exhibit 6, the Motion to Vacate, and the electronic evidence.

Ex.	Document / Date / Docket Reference	Contents / Relevant Parts	Purpose and Relevance to Complaint
3	Notice of Motion to Vacate — June 24, 2026 — MC DE [6]	Seeks relief under Rules 60(b)(3), 60(b)(4), 60(b)(6), 60(d)(3), and an indicative ruling under Rule 62.1 concerning purported DE [244] and DE [245].	Establishes the precise relief sought after the post-recusal acts and identifies the jurisdictional, fraud-upon-the-Court, Rule 56, evidentiary, and due-process grounds presented for correction.
4	Affirmation in Support of Motion to Vacate — June 24, 2026 — MC DE [6]	Detailed sworn factual presentation supporting the Motion to Vacate, including the recusal chronology, treatment of summary-judgment evidence, electronic evidence, removal of filings, and post-recusal proceedings.	Supplies the detailed factual chronology and record citations supporting the misconduct issues presented in this Complaint.
5	Memorandum of Law in Support of Motion to Vacate — June 24, 2026 — MC DE [6]	Legal authorities supporting relief under Rules 60 and 62.1; recusal/disqualification; fraud upon the Court; Rule 56; due process; jurisdiction; and related authorities.	Demonstrates that the challenged conduct was presented through specific legal grounds and authorities rather than merely as disagreement with the outcome of summary judgment.
6	Master Evidence Map and Representative Documentary Evidence	First portion contains the Master Evidence Map of Plaintiff's submissions in DE [224], DE [226], and DE [228]. Remaining pages reproduce representative evidence, including electronic-evidence requests; DE [202]; electronic-evidence directives; DE [30]; Uzcategui/Rydan evidence; DOL materials; termination and Old Westbury records; DE [17]/DE [22]; texts; certified transcripts; payroll/overtime evidence; NDA materials; and other documentary evidence.	Principal evidentiary roadmap. Allows the Judicial Council to compare particular statements in purported DE [244] directly against the contemporaneous documents in the summary-judgment record. Identifies evidence suppressed, disregarded, omitted, selectively cited, or mischaracterized.

Ex.	Document / Date / Docket Reference	Contents / Relevant Parts	Purpose and Relevance to Complaint
7	Visual Map of Evidence Suppressed, Disregarded, Omitted, or Mischaracterized — 5 pages	Cover plus four-page visual summary organizing the challenged conduct into evidentiary and procedural categories and directing the reviewer to the supporting record.	Demonstrative aid only. Provides a concise roadmap to Exhibit 6, the official docket record, Motion to Vacate, and digital evidence. It does not replace the evidence.
8	Second Circuit Appellate Filings Concerning FRAP 12.1 / Motion to Hold Appeals in Abeyance — Appeals Nos. 26-899 and 26-1576 — 55 pages	Appellate filings notifying the Second Circuit of the pending Rule 60/Rule 62.1 proceedings and requesting appropriate appellate treatment while the Motion to Vacate remained pending.	Establishes that the post-recusal, jurisdictional, Rule 60, and indicative-ruling issues were formally presented in the related appellate proceedings rather than created for this misconduct Complaint.
9	Official EDNY Docket Report — Misc. Case No. 2:26-mc-01957-SJB — 3 pages	Official docket showing the miscellaneous proceeding, its relationship to 20-cv-3361, its May 8, 2026, opening/administrative termination, MC DE [6] Motion to Vacate, and subsequent filings through the entries reflected in the report.	Provides an official docket roadmap for the miscellaneous proceeding in which the Motion to Vacate and related submissions were docketed. Important to the Complaint's treatment of the May 8 miscellaneous proceeding and subsequent Rule 60 filings.
10	Digital Evidence Submission — Two DVDs + 3-page Cover Sheet	Disc 1 of 2: Folders 1–8, including photographs, audio, investigation materials/reports, medical records, social-media files, communications, documents, and other ESI. Disc 2 of 2: Folder 9, original family videos, January–November 2018.	Preserves the digital evidence corresponding to the evidence identified in Plaintiff's summary-judgment submissions and June 24 Motion to Vacate. Particularly relevant to DE [244]'s characterization of electronic evidence that it simultaneously stated it was unable to review.

Ex.	Document / Date / Docket Reference	Contents / Relevant Parts	Purpose and Relevance to Complaint
11	DE [224-41] — Senate Judiciary Committee Confirmation-Hearing Material Concerning Judge Sanket J. Bulsara — filed October 3, 2025 — 12 pages	Material previously submitted in Plaintiff's summary-judgment record. Includes the March 6, 2024, Senate Judiciary Committee exchange in which Senator John Kennedy questioned Judge Bulsara concerning prior judicial criticism that he had ignored a “large collection of cases in this District” and a “whole line of cases.”	Contextual evidence relevant to the Complaint's documented concern regarding disregard of material legal authority. To be considered together with the treatment of DE [30] and governing authorities in 20-cv-3361; not offered as a substitute for the evidence of conduct in this case.
12	Official Questions for the Record — Judge Sanket J. Bulsara's 2024 EDNY District-Judge Nomination — 30 pages	Judge Bulsara's written responses concerning the federal judicial oath, impartiality, precedent, governing Supreme Court and Second Circuit law, and the obligation to administer justice “without respect to persons, and do equal right to the poor and to the rich.”	Provides Judge Bulsara's own written articulation of the judicial obligations against which the documented conduct in 20-cv-3361 is compared, including impartiality, fidelity to controlling law, equal justice, and the judicial oath.

PURPOSE OF EXHIBIT INDEX

Pursuant to **Rule 2(e) of the Rules for Judicial-Conduct and Judicial-Disability Proceedings**, Complainant submits **Exhibits 1–12 with the original Complaint** as supporting documentary evidence and materials. The descriptions contained in this Exhibit Index identify the contents, source, and relevance of each exhibit and are provided to facilitate the Judicial Council's review of the documentary record.

The **“Purpose and Relevance”** descriptions are organizational roadmaps only. They do not replace, modify, or supplement the contents of the documents. **The exhibits and official court records themselves control.**

OFFICIAL COURT RECORDS INCORPORATED BY REFERENCE

The following records are incorporated by reference because they are part of the official records of the **United States District Court for the Eastern District of New York**, the related **Miscellaneous Proceeding**, and the **United States Court of Appeals for the Second Circuit**. The representative documents contained in Exhibits 1–12 correspond to these official records and are submitted to facilitate the Judicial Council’s direct review and comparison of the challenged conduct with the record. The complete official records are incorporated by reference and need not be reproduced in their entirety.

A. United States District Court for the Eastern District of New York

Orrego v. Knipfing, et al.

EDNY Case No. 2:20-cv-03361

The following official docket entries and related records are incorporated by reference:

- **DE [30] — Memorandum and Order of Hon. Gary R. Brown.** Addresses the legal sufficiency of Plaintiff’s discrimination, retaliation, and hostile-work-environment claims at the pleading stage; records Plaintiff’s allegation that **Kevin Knipfing aka Kevin James** directed Steve Savitsky to prepare the November 27, 2018, termination letter under the name “**Old Westbury LLC**”; and expressly notes that Defendants had not asserted the *Faragher/Ellerth* affirmative defense.
- **DE [224]** and all supporting Summary Judgment submissions and exhibits constituting Plaintiff’s Opposition to Defendants’ Motion for Summary Judgment.
- **DE [224-2] — Plaintiff’s Local Civil Rule 56.1 Counterstatement**, including Plaintiff’s responses to Defendants’ asserted facts and citations to the evidentiary record.
- **DE [226]** and all supporting papers constituting Plaintiff’s own Motion for Summary Judgment, including Plaintiff’s Rule 56.1 Statement and supporting evidentiary submissions.
- **DE [228]** and all supporting documentary exhibits submitted as part of Plaintiff’s Summary Judgment record.
- **DE [229]** and related filings concerning Plaintiff’s physical submission of electronic evidence, including the flash drive containing photographs, videos, recordings, and other electronically stored information.
- **DE [240] — Notice of Motion to Recuse**, together with the related District Court record and subsequent proceedings in **Second Circuit Appeal No. 26-899**.
- **Purported DE [244] — Memorandum and Order (29 pages), docketed May 8, 2026.** The principal post-recusal purported act challenged in this Complaint, including its treatment of the parties’ Summary Judgment submissions, Plaintiff’s documentary and electronic evidence, and the filing injunction.
- **Purported DE [245] — Judgment, docketed May 8, 2026.**
- **DE [246] — Notice of Appeal concerning purported DE [244] and DE [245], resulting in Second Circuit Appeal No. 26-1576.**

- **November 17, 2025, Order of Recusal and Random Reassignment**, together with the Notices of Electronic Filing documenting the recusal and reassignment of the case for all further proceedings.
- **DE [202] — Notice of Request to Submit Electronic Evidence**, together with the related July 2025 docket entries, communications, and requests concerning submission of voluminous electronic evidence.
- All relevant **Notices of Electronic Filing (“NEFs”)**, docket entries, reassignment records, and administrative entries material to the proceedings addressed in this Complaint.
- All filings concerning Plaintiff’s **June 24, 2026, Motion to Vacate**, including the Notice of Motion, supporting Affirmation, Memorandum of Law, Comparative Analysis of False Statements, Master Evidence Map, representative documentary evidence, and digital evidence.

DE [224], DE [224-2], DE [226], DE [228], and DE [229] are particularly incorporated because they constitute the Summary Judgment record against which the factual statements and treatment of evidence in purported DE [244] can be directly compared. The representative evidence reproduced in Exhibit 6 provides a roadmap to these materials. The original version of this section likewise identified these Summary Judgment submissions as part of the official record incorporated by reference.

B. Related Miscellaneous Proceeding

In re Orrego

EDNY Miscellaneous Case No. 2:26-mc-01957-SJB

The complete official docket is incorporated by reference, including the opening and administrative termination of the miscellaneous proceeding and the subsequent filing of Plaintiff’s Motion to Vacate and related submissions. In particular:

- **DE [1] — Notice of Memorandum and Order** opening the miscellaneous proceeding, directing future filings concerning EDNY Case No. 2:20-cv-03361 to the miscellaneous docket, and administratively closing the matter.
- **DE [5] — Notification of 172-Day Post-Recusal Void Period and Administrative Supervisory Notice** pursuant to 28 U.S.C. § 137.
- **DE [6] — June 24, 2026, Notice of Motion to Vacate** pursuant to Federal Rules of Civil Procedure **60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3)** and requesting an Indicative Ruling pursuant to **Rule 62.1**, together with the Notice to the Clerk of Court, supporting Affirmation, Memorandum of Law, exhibits, and related supporting materials.
- **DE [7] — Administrative Supervisory Notice** pursuant to 28 U.S.C. § 137.
- **DE [8] — Emergency Letter regarding Motions to Reopen.**
- **DE [9] — Notice to the Clerk of Court.**
- **DE [10] — Notice of Potential *Amicus Curiae* Participation.**
- **DE [11] — Application for Leave to File Motion to Reopen.**
- **DE [12] — Notice of Motion to Reopen, Case No. 25-cv-736.**
- **DE [13] — Notice of Motion to Reopen, Case No. 25-cv-769.**

- **DE [14] — Copies of filings addressed to Magistrate Judge Taryn A. Merkl and Chief Judge Margo K. Brodie.**
- **DE [15] — Copies of filings addressed to District Judge Pamela K. Chen.**
- **DE [16] — Corrected Application for Extension of Time to File Petition for Writ of Certiorari.**
- **DE [17] — Second Corrected Application for Extension of Time to File Petition for Writ of Certiorari.**
- The **entire official docket**, including entries documenting the Motion to Vacate, supporting submissions, supervisory notices, emergency filings, and related proceedings.

These entries and descriptions correspond to the official-record materials identified in the prior draft.

The miscellaneous record is incorporated because it documents the procedural disposition of filings concerning EDNY Case No. 2:20-cv-03361 and the docket in which Plaintiff’s June 24, 2026, Motion to Vacate was ultimately filed. **Exhibit 9** provides the Judicial Council with a copy of the official miscellaneous docket for ease of review.

C. United States Court of Appeals for the Second Circuit

The following official appellate proceedings are incorporated by reference:

- **Appeal No. 25-1802**
- **Appeal No. 25-1810**
- **Appeal No. 25-2399**
- **Appeal No. 26-899** — related to **DE [240]**, **Notice of Motion to Recuse**.
- **Appeal No. 26-1576** — arising from **DE [246]**, **Notice of Appeal concerning purported DE [244] and DE [245]**.

The prior record expressly identifies all five appellate proceedings.

The incorporated appellate records include, as applicable:

- Notices of Appeal;
- all docket entries concerning Plaintiff’s Motion to Vacate;
- **Federal Rule of Appellate Procedure 12.1 Notices** concerning the pending Rule 60 Motion and request for an indicative ruling under Rule 62.1;
- jurisdictional notices;
- supervisory notices;
- motions to hold proceedings or appeals in abeyance and other related motions;
- orders;
- mandates;
- correspondence; and
- filings addressing the recusal, jurisdictional issues, and post-recusal purported acts docketed as **DE [244] and DE [245]**.

These categories were expressly included in the existing incorporated-record section.

The appellate records are incorporated to provide the Judicial Council with the complete procedural context in which the recusal, post-recusal exercise of judicial authority, Motion to Vacate, Rule 62.1 indicative-ruling request, Rule 56 issues, and challenges to purported DE [244] and DE [245] were presented and preserved.

The official court records incorporated by reference are distinct from Exhibits 1–12. Their incorporation does not enlarge or renumber the supporting exhibits submitted with the original Complaint. Selected copies of official records supplied with the additional copies of the Complaint are separately identified as Supplemental Record (“SR”) materials solely for ease of review.

DIGITAL EVIDENCE SUBMITTED — EXHIBIT 10

The following physical digital media accompany the original Complaint as **Exhibit 10**. The two DVDs contain the same digital evidence previously submitted in support of Plaintiff’s **June 24, 2026 Motion to Vacate**, filed in **EDNY Miscellaneous Case No. 2:26-mc-01957-SJB, DE [6]**, concerning the post-recusal purported acts docketed as **DE [244] and DE [245]** in *Orrego v. Knipfing, et al.*, EDNY Case No. **2:20-cv-03361**.

The digital evidence is resubmitted with this Judicial Misconduct Complaint to preserve and facilitate review of the evidentiary record supporting the Motion to Vacate, including the supporting Affirmation, Memorandum of Law, Comparative Analysis of False Statements, Master Evidence Map, and representative documentary evidence. The previously drafted record likewise identifies these DVDs as the digital evidence submitted with the June 24, 2026, Motion to Vacate.

DISC 1 OF 2

Plaintiff’s Motion to Vacate Summary Judgment (Purported Acts DE [244] and DE [245]) — Digital Evidence Submission Folders 1–8

Disc 1 contains original and representative electronically stored information referenced throughout Plaintiff’s Summary Judgment submissions and Motion to Vacate, including:

- **Photographs;**
- **Audio Recordings;**
- **Investigation Reports;**
- **Medical Reports;**
- **New York State Department of Labor Records;**
- **Social Media Files;**
- **Electronic Communications;**
- **Emails;**
- **Text Messages;**
- **Documentary Evidence;**

- **Other Electronically Stored Information (“ESI”);**
- photographs of **Kevin Knipfing aka Kevin James;**
- photographs of **Stephanieanna Knipfing aka Steffiana De La Cruz;** and
- additional representative electronic evidence referenced throughout the Motion to Vacate and supporting evidentiary record.

These categories correspond to the contents previously identified for Disc 1 in the supporting materials.

The contents of Disc 1 are particularly relevant to the Complaint because the record documents Plaintiff’s repeated efforts to obtain the Court’s electronic upload mechanism for voluminous evidence, including the requests reproduced in **Exhibit 6**, while purported DE [244] subsequently addressed Plaintiff’s failure to submit or make accessible electronic evidence. Exhibit 6 contains the corresponding requests for the electronic upload link, the Court’s direction concerning communications with Chambers, and the applicable Individual Rules.

DISC 2 OF 2

Plaintiff’s Motion to Vacate Summary Judgment (Purported Acts DE [244] and DE [245]) — Digital Evidence Submission Folder 9

Disc 2 contains:

- **Original Family Videos;**
- videos covering the period from **January 2018 through November 2018;**
- **Original Digital Video Files;** and
- the **final video authorized by Kevin Knipfing aka Kevin James.**

These contents correspond to the previously identified contents of Folder 9.

PURPOSE AND RELATIONSHIP TO THE DOCUMENTARY RECORD

Exhibit 10 is not a new evidentiary submission created for this Judicial Misconduct Complaint. The DVDs preserve the digital evidence previously submitted in connection with Plaintiff’s Motion to Vacate and correspond to the documentary evidence and record citations identified in the **Comparative Analysis of False Statements and 180-page Master Evidence Map contained in Exhibit 6.**

The digital evidence is particularly material to the Complaint’s challenge to the treatment of Plaintiff’s Summary Judgment record because Plaintiff’s Motion to Vacate compares statements in purported DE [244] with evidence previously submitted in **DE [224], DE [224-2], DE [226], DE [228], and DE [229].** That evidentiary record includes affidavits, Rule 56.1 submissions, investigation materials, governmental records, witness interviews, emails, text messages, photographs, audio recordings, electronically stored information, and original digital video files.

The enclosed DVDs therefore supplement the representative printed documents contained in the supporting exhibits and permit the Judicial Council to review the electronic materials themselves rather than relying solely upon descriptions of those materials. They are incorporated by reference throughout the Complaint, Statement of Facts, Motion to Vacate, supporting Affirmation, Memorandum of Law, Comparative Analysis of False Statements, Master Evidence Map, and related documentary record.

Exhibit 10 consists of the Digital Evidence Cover Sheet together with Disc 1 of 2 and Disc 2 of 2. Only one complete set of the digital media is submitted with the original Complaint pursuant to Rule 2(e); the four additional copies of the Complaint do not duplicate the DVDs.

AUTHORITIES

The following authorities are submitted to identify the legal and ethical duties implicated by the documentary record. They are not offered merely to challenge the correctness of an adverse judicial determination. The Complaint concerns the accuracy and integrity of the judicial record, treatment of evidence, opportunity to be heard, conduct following recusal, and administration of the proceedings documented in Exhibits 1–12 and the official court records incorporated by reference.

A. Judicial Disqualification and Recusal

Under **28 U.S.C. §§ 144 and 455**, federal law requires judicial disqualification when the statutory grounds are satisfied. Section 455 is directed not only to actual partiality but also to circumstances in which judicial impartiality may reasonably be questioned.

The Supreme Court recognized in *Liljeberg v. Health Services Acquisition Corp.*, **486 U.S. 847 (1988)** that a violation of § 455 may require vacatur after consideration of the circumstances, including the risk of injustice to the parties, the risk that denial of relief will produce injustice in other cases, and the risk of undermining public confidence in the judicial process.

This Complaint concerns conduct occurring after **Judge Sanket J. Bulsara entered the November 17, 2025, Order of Recusal and Random Reassignment** in *Orrego v. Knipfing, et al.*, EDNY Case No. 2:20-cv-03361. The case was reassigned to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for further proceedings. The subsequent purported acts docketed as **DE [244] and DE [245] on May 8, 2026**, 172 days after the recusal, are therefore examined against the recusal order and the subsequent docket history. (**Exs. 1–6; SR-1; SR-3; SR-4.**)

The June 24, 2026, Motion to Vacate expressly presented the post-recusal issue together with the supporting Affirmation, Memorandum of Law, Comparative Analysis of False Statements, Master Evidence Map, representative documentary evidence, and digital evidence. The original supporting materials likewise identify the recusal and post-recusal sequence as a central matter submitted for Judicial Council review.

The issue presented here is therefore broader than whether a particular legal conclusion in DE [244] was correct. The documentary record permits examination of whether substantive judicial authority continued to be exercised after recusal and reassignment and whether that conduct is compatible with the statutory requirements of disqualification and the ethical duties of a federal judge.

B. Fraud by Government

United States v. Holzer, **816 F.2d 304, 307–08 (7th Cir. 1987)** discussed the fiduciary character of public office, including the relationship of a judge to litigants, in addressing deliberate concealment of material information in a setting involving fiduciary obligations.

The prior supporting materials identify the pertinent *Holzer* discussion and further note that Justice Stevens subsequently quoted that discussion in his dissent in *McNally v. United States*, 483 U.S. 350, 371–72 (1987). Because the *McNally* language appears in a dissent, this Complaint relies upon it only with that qualification and identifies *Holzer* as the source of the quoted discussion.

These authorities are relevant to the Complaint because the documentary record identifies specific statements in purported DE [244] and places them directly beside record evidence that contradicts, qualifies, or materially changes those statements. The Complaint therefore presents the documents themselves for independent review rather than asking the Judicial Council to accept a characterization of the evidence without examining the record. (Ex. 2; Ex. 6; Ex. 7; Ex. 10; EDNY DE [224], [224-2], [226], [228], [229].)

C. Fraud Upon the Court

Plaintiff's June 24, 2026, Motion to Vacate expressly sought relief pursuant to **Federal Rules of Civil Procedure 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3)** and requested an indicative ruling pursuant to **Rule 62.1** while related appellate proceedings were pending. The prior supporting materials identify these grounds and the supporting evidentiary package.

Rule **60(d)(3)** expressly preserves the federal court's power to “**set aside a judgment for fraud on the court.**” Relevant Supreme Court authority includes *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), addressing fraud directed at the judicial process itself.

The Motion to Vacate is **record-based**. It identifies specific factual statements contained in purported DE [244] and compares them with the corresponding documentary evidence previously submitted in:

DE [224] — Plaintiff's Opposition and supporting Summary Judgment submissions;
DE [224-2] — Plaintiff's Local Civil Rule 56.1 Counterstatement;
DE [226] — Plaintiff's own Motion for Summary Judgment and supporting papers;
DE [228] — Plaintiff's supporting documentary evidence; and
DE [229] — Plaintiff's electronic-evidence submission.

The supporting Comparative Analysis and Master Evidence Map identify corresponding affidavits, Rule 56.1 submissions, investigation reports, governmental records, witness interviews, emails, text messages, photographs, recordings, electronically stored information, and original digital video evidence.

Accordingly, the fraud-upon-the-Court issue presented in the Complaint concerns whether the integrity of the judicial process was compromised by material factual statements and treatment of evidence contradicted by the record—not merely whether Plaintiff disagrees with the ultimate disposition.

D. Federal Rule of Civil Procedure 56 and Due Process

Federal Rule of Civil Procedure 56 requires summary judgment to be determined from the evidentiary record and permits judgment only where the movant demonstrates that **“there is no genuine dispute as to any material fact”** and entitlement to judgment as a matter of law.

Rule **56(c)** specifically governs the parties' factual assertions and requires citation to particular materials in the record. Rule **56(e)** addresses the Court's options when a party fails properly to support or address a factual assertion.

The Rule 56 issue presented here is not that a district judge must write a separate paragraph answering every numbered Rule 56.1 statement. Rather, the issue is whether the Court actually considered and adjudicated the **material factual disputes and cited evidence** placed before it before resolving summary judgment.

Plaintiff submitted a substantial Rule 56 record:

- **DE [224]** — Opposition to Defendants' Motion for Summary Judgment and supporting submissions;
- **DE [224-2]** — Plaintiff's Local Civil Rule 56.1 Counterstatement responding to Defendants' asserted facts and directing the Court to supporting evidence;
- **DE [226]** — Plaintiff's own Motion for Summary Judgment and supporting papers;
- **DE [228]** — additional documentary evidence supporting Plaintiff's factual positions; and
- **DE [229]** — electronic evidence submitted in connection with the Summary Judgment record.

These filings are expressly among the official District Court records incorporated by reference.

The Complaint documents that purported DE [244] did not meaningfully address substantial portions of Plaintiff's Opposition, Plaintiff's own Summary Judgment Motion, or the material factual disputes and corresponding evidence identified in Plaintiff's Rule 56.1 submissions. Instead, the Master Evidence Map identifies specific instances in which evidence was omitted, disregarded, selectively cited, or mischaracterized, including instances in which DE [244] stated that evidence was absent despite contemporaneous evidence in the record addressing the precise factual issue. (**Ex. 2; Ex. 6; Ex. 7; EDNY DE [224], [224-2], [226], [228], [229].**)

The electronic evidence presents an additional Rule 56 problem. Plaintiff repeatedly sought the mechanism identified by the Court for transmitting voluminous electronic evidence, formally filed **DE [202]**, and ultimately physically submitted the electronic evidence as **DE [229]**. The evidence included photographs, videos, recordings, communications, and other ESI relevant to the disputed material facts. (**Ex. 6; Ex. 10.**)

Purported DE [244] nevertheless stated that the electronic evidence could not be reviewed while simultaneously characterizing it as substantially or **“largely duplicative.”** The Complaint presents the submission history and electronic evidence so that the Judicial Council can independently compare that characterization with what was actually submitted.

The due-process issue is correspondingly concrete: Plaintiff placed factual positions and supporting evidence before the Court, sought the prescribed mechanism for submitting evidence that could not readily be filed conventionally, and received no meaningful opportunity to cure the stated inability to access the electronic evidence before summary judgment was resolved.

The Supreme Court has repeatedly recognized that due process fundamentally requires notice and a meaningful opportunity to be heard. See, e.g., *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

The Complaint therefore presents the Rule 56 issue together with **Canon 3A(4)** because the concern is not simply an erroneous evidentiary ruling; it is whether Plaintiff was actually accorded the right to have her material factual submissions and supporting evidence heard and considered according to law.

E. Code of Conduct for United States Judges — Canons Violated

The documentary conduct presented in this Complaint implicates several provisions of the **Code of Conduct for United States Judges**.

Canon 1 — Integrity and Independence of the Judiciary

Canon 1 requires a judge to uphold the integrity and independence of the judiciary.

The Complaint invokes Canon 1 because the documented issues—including post-recusal substantive activity, treatment of material record evidence, contradictory factual statements, handling of electronic evidence, and restrictions on access to filing procedures—directly concern public confidence in the integrity of judicial proceedings.

Canon 2A — Appearance of Impropriety; Respect for and Compliance with Law

Canon 2A requires a judge to respect and comply with the law and to act at all times in a manner that promotes public confidence in the **integrity and impartiality of the judiciary**.

This Canon is particularly relevant to the cumulative record: a pro se litigant's evidence was allegedly omitted or mischaracterized while factual propositions favorable to Defendants were accepted; the electronic evidence was characterized despite the stated inability to review it; and substantive purported acts followed an express recusal and reassignment.

Canon 3A(1) — Fidelity to Law and Professional Competence

Canon 3A(1) provides that a judge should be **faithful to, and maintain professional competence in, the law**.

This duty is implicated by the treatment of Rule 56, the prior DE [30] decision, governing recusal principles, and the legal authorities presented in Plaintiff's submissions.

Exhibit 11 provides additional context because it contains material previously filed as DE [224-41] concerning the questioning of Judge Balsara during his Senate confirmation proceedings regarding treatment of prior case authority.

Canon 3A(3) — Patience, Dignity, Respect, and Fair Treatment

Canon 3A(3) concerns the obligation to perform judicial duties with patience, dignity, respect, and appropriate treatment of litigants and others involved in the judicial process.

The Complaint invokes this Canon in connection with the treatment of Plaintiff as a pro se litigant, the filing restrictions, the electronic-evidence submission process, and the cumulative administration of the proceedings.

Canon 3A(4) — Right to Be Heard According to Law

Canon 3A(4) recognizes the fundamental obligation to accord every person who has a legal interest in a proceeding, and that person's lawyer, the **full right to be heard according to law**.

This Canon is central to the Complaint. Plaintiff submitted an Opposition, Rule 56.1 Counterstatement, her own Motion for Summary Judgment, extensive documentary evidence, and electronic evidence. The Complaint documents the failure to meaningfully address material portions of those submissions, together with the inability to cure the electronic-evidence issue before disposition.

Canon 3C — Disqualification

Canon 3C governs circumstances requiring judicial disqualification.

It is directly implicated by the November 17, 2025, Order of Recusal and Random Reassignment and the subsequent purported substantive acts docketed as DE [244] and DE [245].

Judge Balsara's Own Written Statements Concerning These Duties Exhibit 12 is additionally relevant because it contains Judge Balsara's Official Questions for the Record submitted in connection with his 2024 nomination to the United States District Court for the Eastern District of New York.

Those responses document his recognition of the federal judicial oath under **28 U.S.C. § 453**, including the duty to administer justice:

“without respect to persons and do equal right to the poor and to the rich.”

They also document his representations concerning impartiality and faithful application of governing Supreme Court and Second Circuit precedent.

Exhibit 12 is therefore submitted as Judge Balsara's own written articulation of judicial obligations against which the documented conduct in 20-cv-3361 may be independently evaluated.

F. Application to the Documentary Record

The documentary evidence contained in the official District Court record, the official docket of **Miscellaneous Case No. 2:26-mc-01957-SJB**, the Second Circuit records, Exhibits **1–12**, and the enclosed digital evidence establishes the record submitted for the Judicial Council's independent examination.

Specifically:

- **Recusal and post-recusal conduct.** Judge Sanket J. Bulsara entered the **November 17, 2025, Order of Recusal and Random Reassignment** before the subsequent purported substantive acts docketed as **DE [244]** and **DE [245]** on May 8, 2026. (**Exs. 1–2; SR-1.**)
- **Rule 56 record.** Plaintiff filed **DE [224]**, **DE [224-2]**, **DE [226]**, **DE [228]**, and **DE [229]**, containing her Opposition, Rule 56.1 factual responses, her own Summary Judgment Motion, documentary evidence, and electronic evidence. The Master Evidence Map identifies the relationship between those filings and factual statements contained in purported **DE [244]**. (**Exs. 2, 6–7, 10.**)
- **Judge Brown's DE [30].** The record contains Judge Gary R. Brown's earlier Memorandum and Order addressing Plaintiff's discrimination, retaliation, hostile-work-environment claims, Old Westbury LLC, and the absence at that stage of a *Faragher/Ellerth* defense. **DE [30]** is reproduced within the representative evidence and incorporated by reference.
- **Specific documentary contradictions.** Exhibit 6 contains the contemporaneous texts, Uzcategui/Rydan investigation materials, termination and Old Westbury records, certified transcripts, payroll/overtime materials, NDA-related evidence, and other documents used to compare particular statements in **DE [244]** against the actual evidentiary record.
- **Electronic-upload requests.** Plaintiff repeatedly requested the Court's electronic upload link for the voluminous electronic evidence. The supporting record contains the requests, **DE [202]**, and the related docket communications. The prior documentary summary expressly identifies the contradiction between those repeated requests and the statement attributed to Plaintiff in purported **DE [244]** concerning failure to obtain or request the upload mechanism.
- **Direction not to contact Chambers.** The same evidentiary sequence includes the Court's direction concerning communications with Chambers while the applicable Individual Rules provided a procedure for obtaining the mechanism necessary to transmit large electronic files. **Exhibit 6** reproduces the relevant requests, docket entries, direction concerning Chambers, and Individual Rules so that the Judicial Council can examine the complete chronology rather than either statement in isolation.
- **No opportunity to cure electronic evidence.** After Plaintiff physically submitted the electronic evidence as **DE [229]**, no technical deficiency was identified to Plaintiff and no meaningful opportunity to cure the stated access problem was provided before purported **DE [244]** disposed of the Summary Judgment motions. The electronic evidence is resubmitted as **Exhibit 10, Disc 1 of 2 and Disc 2 of 2.**
- **Characterization of unreviewed evidence.** Purported **DE [244]** stated that the electronic evidence could not be reviewed while also characterizing it as largely duplicative. Exhibits 6 and 10 permit direct examination of the submission history and the electronic evidence.

- **Motion to Vacate.** Plaintiff challenged these matters through the **June 24, 2026, Motion to Vacate, MC DE [6]**, supported by an Affirmation, Memorandum of Law, Comparative Analysis of False Statements, Master Evidence Map, representative evidence, and digital evidence. The original supporting materials expressly describe this as a record-based comparison rather than generalized disagreement with the result.
- **Miscellaneous proceeding.** The Motion to Vacate was docketed in **2:26-mc-01957-SJB**, the miscellaneous proceeding reflected in Exhibit 9 and SR-2. The official docket is incorporated by reference to permit review of the handling of those filings.
- **Appellate preservation.** The related appellate records include **Second Circuit No. 26-899**, associated with DE [240], and **Second Circuit No. 26-1576**, arising from DE [246]'s appeal concerning purported DE [244] and DE [245], together with the FRAP 12.1 and related filings incorporated by reference.
- **Prior and contemporaneous statements concerning judicial obligations.** Exhibit 11 supplies contextual material concerning prior questioning over treatment of case authority, while Exhibit 12 contains Judge Bulsara's own written representations concerning impartiality, governing precedent, the judicial oath, and equal justice.
- **Public statements concerning the opportunity to be heard.** Judge Bulsara publicly described oral argument as serving to obtain greater understanding and depth through dialogue with prepared “lawyers” and “counsel.” (**SR-5.**) The Judicial Council may compare those statements with the official record concerning the opportunity afforded to Complainant as a pro se litigant to have her Rule 56 submissions and supporting evidence meaningfully considered. (**Exs. 2, 6, 7, 10; EDNY DE [224], [224-2], [226], [228], [229].**)

The documentary record therefore permits the Judicial Council to examine the challenged conduct **document by document and statement by statement**. The Complaint does not require acceptance of Complainant's characterization of the evidence: **purported DE [244], the Rule 56 submissions, the Master Evidence Map, representative documents, official dockets, and original digital evidence are supplied or incorporated so that each material comparison can be independently verified.**

These materials are respectfully submitted for review under **28 U.S.C. §§ 351–364** and the **Rules for Judicial-Conduct and Judicial-Disability Proceedings**.

SUPPLEMENTAL RECORD (“SR”) MATERIALS AND REVIEW ROADMAP

For ease of review, selected official court records are reproduced with the **four additional copies of the Complaint and Statement of Facts** and designated as **Supplemental Record (“SR”) materials**.

“SR” means “Supplemental Record.” The designations **SR-1, SR-2, SR-3, and SR-4** are used solely as organizational references so that the Judicial Council can readily locate and compare the official docket history and appellate proceedings cited throughout the Complaint.

The SR materials are **not additional exhibits**. They do not alter, replace, supplement, or renumber **Exhibits 1–12**, which constitute the supporting exhibits submitted with the original Complaint. The SR designation likewise does not create a separate evidentiary record; each SR item is an official court record reproduced for convenience and remains identifiable by its original case number, docket entry, and appellate number:

Exhibit 7 — Visual Map of Evidence Suppressed, Disregarded, Omitted, or Mischaracterized

A visual organizational roadmap identifying the principal categories of challenged conduct and directing the reviewer to the corresponding Motion to Vacate, Master Evidence Map, documentary evidence, digital evidence, and official court records. **Exhibit 7 retains its original exhibit designation and is reproduced with the Complaint copies solely as a review aid; it is not redesignated as an SR item.**

SR-1 — Official District Court Docket

Orrego v. Knipfing, et al.

United States District Court for the Eastern District of New York

Case No. 2:20-cv-03361

Official District Court docket reproduced as a procedural roadmap to the proceedings addressed in this Complaint, including the Summary Judgment record; Plaintiff’s Opposition and own Motion for Summary Judgment; submission of documentary and electronic evidence; the November 17, 2025 recusal and random reassignment; DE [240]; the post-recusal purported acts docketed as DE [244] and DE [245]; DE [246]; and subsequent docket activity.

Purpose: To permit the Judicial Council to verify the chronology directly from the official docket and readily locate the docket entries and supporting evidence cited throughout the five-page Statement of Facts and Exhibits 1–12.

SR-2 — Official Miscellaneous Proceeding Docket

In re Orrego

United States District Court for the Eastern District of New York

Miscellaneous Case No. 2:26-mc-01957-SJB

Official docket of the related miscellaneous proceeding, documenting its opening and administrative termination on **May 8, 2026**, together with the filings subsequently docketed there, including Plaintiff's **June 24, 2026 Motion to Vacate, MC DE [6]**, and related supervisory, emergency, and administrative submissions.

The official miscellaneous record identifies MC DE [6] as Plaintiff's Motion to Vacate under Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), with a request for an indicative ruling under Rule 62.1.

Purpose: To facilitate review of the handling of Plaintiff's post-judgment and post-recusal filings and the miscellaneous docket in which the Motion to Vacate and related submissions were placed.

SR-3 — DE [240] / Second Circuit Appeal No. 26-899

DE [240] — Notice of Motion to Recuse

EDNY Case No. 2:20-cv-03361

Related Second Circuit Appeal No. 26-899

Selected official District Court and appellate records concerning DE [240] and **Second Circuit Appeal No. 26-899**.

Purpose: To provide the Judicial Council with the official procedural record concerning the recusal-related proceedings and appellate review referenced throughout the Complaint, without requiring the reviewer to retrieve those materials separately from the District Court and Second Circuit dockets.

SR-4 — DE [246] / Second Circuit Appeal No. 26-1576

DE [246] — Notice of Appeal concerning purported DE [244] and DE [245]

EDNY Case No. 2:20-cv-03361

Second Circuit Appeal No. 26-1576

Selected official District Court and appellate records concerning the appeal from the post-recusal purported acts docketed as **DE [244] and DE [245]**.

Purpose: To facilitate direct review of the appellate proceeding challenging DE [244] and DE [245] and to document that the jurisdictional, recusal, due-process, Rule 56, and related issues concerning those purported acts were preserved through appellate proceedings.

The official-record section separately incorporates Second Circuit Appeals **25-1802, 25-1810, 25-2399, 26-899, and 26-1576**, together with relevant FRAP 12.1 notices, jurisdictional and

supervisory notices, motions, orders, mandates, correspondence, and filings concerning the post-recusal purported acts.

SR-5 — Federal Bar Council Quarterly Profile of Judge Sanket J. Bulsara

Federal Bar Council Quarterly, “Judge Sanket Bulsara,” Jun./Jul./Aug. 2025, Vol. XXXII, No. 4.

The article discusses Judge Bulsara's publicly stated approach to case management and oral argument. He acknowledged the “**vast diversity of civil matters and litigants**” appearing before the Court and stated that a “**one-size-fits-all approach to case management doesn’t work.**”

In the section titled “**Be Prepared,**” however, the discussion of oral argument is expressly framed in terms of represented litigants. The article states that Judge Bulsara offered advice to “**lawyers appearing for oral arguments in his court,**” praised exceptionally prepared lawyers, and stated that oral argument achieves its purpose when “**counsel**” are sufficiently prepared to engage in dialogue with the Court.

Purpose: Submitted as contextual material concerning Judge Bulsara's publicly stated approach to courtroom participation and oral argument. The article is not offered, standing alone, as proof of discriminatory treatment of pro se litigants. Its relevance arises from comparison with the official record in 20-cv-3361 documenting Complainant's treatment as a pro se litigant, including her opportunity to be heard, treatment of her Rule 56 submissions, requests to submit electronic evidence, and treatment of evidence submitted in DE [224], DE [224-2], DE [226], DE [228], and DE [229].

RELATIONSHIP BETWEEN THE REVIEW ROADMAP, SUPPLEMENTAL RECORD, AND EXHIBITS 1–12

Exhibits 1–12 constitute the complete supporting documentary materials and evidence submitted with the **original Complaint**.

Exhibit 7 — Visual Map forms part of Exhibits 1–12 but is additionally reproduced with each Complaint copy as an organizational roadmap for ease of review. Its reproduction does not create a duplicate or additional exhibit.

Official Court Records Incorporated by Reference identify the broader District Court, miscellaneous, and appellate records that the Judicial Council may consult directly from the official court dockets.

SR-1 through SR-4 are selected copies of official court records reproduced with the **original Complaint and the four additional Complaint copies** solely for convenience, ease of review, and as an organizational roadmap. The SR materials are not additional exhibits and do not alter, supplement, or renumber Exhibits 1–12.

Accordingly, citation to an SR item does not replace citation to the underlying official docket entry. Where appropriate, the Statement of Facts identifies both—for example: **“EDNY DE [246]; Second Circuit No. 26-1576; SR-4.”**

EXHIBIT 7

This demonstrative exhibit summarizes the evidentiary record identified in Plaintiff's Motion to Vacate and supporting submissions.

It is intended as an organizational aid to assist the Judicial Council in locating the corresponding documentary evidence contained in the official court record, the representative exhibits attached to this Complaint, and the enclosed digital evidence.

MAP OF EVIDENCE

SUPPRESSED, DISREGARDED, OMITTED, OR MISCHARACTERIZED

IN THE POST-RECUSAL PURPORTED ACT (VOID AND NULL) DOCKETED AS DE 244



EDNY Case No. 2:20-cv-03361-SJB-AYS
Demonstrative Summary of Plaintiff's Summary Judgment Record



This Map summarizes how evidence in Plaintiff's Summary Judgment submissions was suppressed, disregarded, omitted, or mischaracterized in the post-recusal purported act (void and null) docketed as DE 244.

[See Motion to Vacate \(MC DE 6\) and Exhibit 6.](#)

THIS MAP IS ORGANIZED INTO 8 CATEGORIES:

1



PROCEDURAL DUE PROCESS VIOLATIONS

- Order of Recusal and Random Reassignment (Nov. 17, 2025)
- Post-recusal purported acts (DE 244 & DE 245)
- Electronic evidence upload issues and restrictions
- Ex parte communications
- Local Rule 7.1 and Rule 56 procedures not followed

RECORD SUPPORT

- Order of Recusal (Nov. 17, 2025)
- DE 244 (purported act – void and null)
- DE 245 (purported act – void and null)
- Motion to Vacate (MC DE 6)
- Correspondence and Orders re: upload link and communication restrictions

2



EVIDENCE SUBMITTED BUT DISREGARDED

- Affidavits
- Declarations
- Rule 56.1 Counterstatement (DE 224-2)
- Documentary evidence
- Audio recordings
- Digital evidence (photos, videos)
- Expert evaluations and opinions

RECORD SUPPORT

- DE 224 • DE 224-2 • DE 226
- DE 228 • DE 229

3



EVIDENCE MISCHARACTERIZED

- Facts distorted
- Context omitted
- Selective citation of evidence
- Conclusions not supported by the record
- Misleading characterization of testimony and documents

RECORD SUPPORT

- Motion to Vacate (MC DE 6)
- Affirmation in Support (Exhibit 4)
- Comparative Analysis of False Statements (within Exhibit 6)
- Master Evidence Map (Exhibit 6)

MAP OF EVIDENCE

SUPPRESSED, DISREGARDED, OMITTED, OR MISCHARACTERIZED IN THE POST-RECUSAL PURPORTED ACT (VOID AND NULL) DOCKETED AS DE 244



EDNY Case No. 2:20-cv-03361-SJB-AYS

Demonstrative Summary of Plaintiff's Summary Judgment Record



This Map summarizes how evidence in Plaintiff's Summary Judgment submissions was suppressed, disregarded, omitted, or mischaracterized in the post-recusal purported act (void and null) docketed as DE 244.

[See Motion to Vacate \(MC DE 6\) and Exhibit 6.](#)



CREDIBILITY DETERMINATIONS WITHOUT EVIDENTIARY BASIS

- Sworn testimony disregarded
- Documentary evidence discounted
- No evidentiary hearing
- Credibility findings based on disputed facts
- Improper weighing of evidence at summary judgment stage

RECORD SUPPORT

- Depositions and Affidavits (DE 224, 226, 228)
- Rule 56.1 Submissions (DE 224-2)
- Documentary Exhibits (DE 224, 226, 228, 229)



MATERIAL FACTS OMITTED

REPRESENTATIVE DOCUMENTS

- ☒ Judge Gary R. Brown's Memorandum and Order (DE 30)
- ☒ Rebecca Uzcategui Investigation Interview
- ☒ Investigation Report
- ☒ Department of Labor Records
- ☒ November 27, 2018 Termination Letter
- ☒ Loft Legal Opinion
- ☒ Teresa Zantua Text Messages
- ☒ Plaintiff's Emails
- ☒ Upload-Link Requests and Responses
- ☒ Order Directing Plaintiff Not to Contact Chambers
- ☒ Judge Bulsara's Individual Rules
- ☒ Photographs, Audio Recordings, Videos, ESI

RECORD SUPPORT

- DE 30
- DE 224
- DE 224-2
- DE 226
- DE 228
- DE 229
- Motion to Vacate (MC DE 6)
- Exhibit 6
- Exhibit 10 (Digital Evidence)



MISAPPLICATION OF LAW

- Rule 56 Summary Judgment Standards
- Controlling Precedent
- Recusal and Disqualification Principles
- Rule 60(b)(3), (b)(4), (b)(6), and 60(d)(3)
- Due Process Rights
- Misinterpretation of Evidence Law

RECORD SUPPORT

- Memorandum of Law in Support (Exhibit 5)
- Motion to Vacate (MC DE 6)
- Legal Authorities Cited in MC DE 6

MAP OF EVIDENCE

**SUPPRESSED, DISREGARDED, OMITTED, OR MISCHARACTERIZED
IN THE POST-RECUSAL PURPORTED ACT (VOID AND NULL) DOCKETED AS DE 244**



EDNY Case No. 2:20-cv-03361-SJB-AYS

Demonstrative Summary of Plaintiff's Summary Judgment Record



This Map summarizes how evidence in Plaintiff's Summary Judgment submissions was suppressed, disregarded, omitted, or mischaracterized in the post-recusal purported act (void and null) docketed as DE 244.

See Motion to Vacate (MC DE 6) and Exhibit 6.

7



**IMPROPER
SUMMARY
JUDGMENT**

- Genuine disputes of material fact exist
- Documentary and testimonial conflicts
- Evidence viewed in the light most favorable to Defendants
- Improper resolution of factual disputes
- Failure to draw all reasonable inferences in Plaintiff's favor

RECORD SUPPORT

- DE 224
- DE 224-2
- DE 226
- DE 228
- DE 229
- Motion to Vacate (MC DE 6)
- Exhibit 6
- Exhibit 10 (Digital Evidence)

SUMMARY: The purported act (DE 244) resolved disputes of material fact, ignored conflicting documentary evidence, and drew inferences against Plaintiff in violation of Rule 56.

8



**PATTERN IDENTIFIED
IN THE MOTION
TO VACATE**

ACCORDING TO THE MOTION TO VACATE, SUPPORTING AFFIRMATION, MEMORANDUM OF LAW, AND COMPARATIVE ANALYSIS OF FALSE STATEMENTS:

- Documentary evidence omitted
- Documentary evidence selectively cited
- Documentary evidence mischaracterized
- Material facts disregarded
- Due process concerns
- Record-based factual inconsistencies
- Pattern of factual distortion throughout the purported acts (DE 244 & DE 245)

RECORD SUPPORT

- Motion to Vacate (MC DE 6)
- Affirmation in Support (Exhibit 4)
- Memorandum of Law (Exhibit 5)
- Comparative Analysis of False Statements (Exhibit 6)
- Master Evidence Map (Exhibit 6)
- Exhibit 10 (Digital Evidence)

SUMMARY: The pattern of suppression, omission, and mischaracterization of evidence demonstrates a consistent disregard for Plaintiff's record and due process rights.

MAP OF EVIDENCE

SUPPRESSED, DISREGARDED, OMITTED, OR MISCHARACTERIZED IN THE POST-RECUSAL PURPORTED ACT (VOID AND NULL) DOCKETED AS DE 244



EDNY Case No. 2:20-cv-03361-SJB-AYS

Demonstrative Summary of Plaintiff's Summary Judgment Record



This Map summarizes how evidence in Plaintiff's Summary Judgment submissions was suppressed, disregarded, omitted, or mischaracterized in the post-recusal purported act (void and null) docketed as DE 244.

See Motion to Vacate (MC DE 6) and Exhibit 6.

RECORD REFERENCES



- DE 30 (Judge Gary R. Brown's Memorandum and Order)
- DE 224 (Opposition / Exhibits)
- DE 224-2 (Rule 56.1 Statement)
- DE 226 (Plaintiff's MSJ Package)
- DE 228 (Additional Exhibits)
- DE 229 (Flash Drive – Digital Evidence)
- DE 244 (Purported Act – Void and Null)
- DE 245 (Purported Act – Void and Null)
- Motion to Vacate (MC DE 6)
- Exhibit 6 (Master Evidence Map)
- Exhibit 10 (Digital Evidence)

MISCELLANEOUS CASE NO. 2:26-mc-01957-SJB



- MC initiated for Motion to Vacate purported acts (DE 244 & DE 245)
- Relief sought under FRCP 60(b), 60(d)(3) and 62.1
- Fraud upon the Court
- Suppression and mischaracterization of material evidence
- Violation of Rule 56 and Local Rules
- Due process violations
- Request for vacatur of void and null acts

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT



- Appeal Nos. 25-1802, 25-1810, 25-2399, 26-899, 26-1576
- FRAP 12.1 Filings
- Notices and Correspondence
- Related Motions and Orders
- Judicial misconduct complaint regarding failure to correct egregious errors

DIGITAL EVIDENCE (EXHIBIT 10)



Disc 1 of 2 – Folders 1–8
(Photos, Audio, Documents,
Emails, Texts, ESI, etc.)

Disc 2 of 2 – Folder 9
(Original Videos
Jan–Nov 2018)

*All evidence was properly
submitted but ignored,
disregarded, or mischaracterized.*



KEY IMPACT

The suppression, disregard, omission, and mischaracterization of this evidence affected the outcome of the case and denied Plaintiff a fair and impartial adjudication.



CONCLUSION

This demonstrative Map shows a consistent pattern of suppression, mischaracterization, and legal error that affected the outcome of the case and denied Plaintiff a fair and impartial adjudication.

JUSTICE DELAYED. IS JUSTICE DENIED.

“

A judge who deceives litigants under the cloak of law, or who is capable of doing so, should be held to answer.”

— Judge John J. McNally, Jr. (Dissent)

In re: Inquiry Concerning a Judge, 491 A.2d 278, 280 (N.J. 1985)

AUTHORITIES SUPPORTING THIS MAP

- Federal Rules of Civil Procedure: 56, 60(b), 60(d)(3), 62.1
- 28 U.S.C. §§ 455, 144
- *Liljeberg v. Health Services Acquisition Corp.*, 486 U.S. 847 (1988)
- *Holzer v. County of Suffolk*, 376 F.3d 225 (2d Cir. 2004)
- McNally Dissent: In re: Inquiry Concerning a Judge, 491 A.2d 278 (N.J. 1985)

SR-1
OFFICIAL DISTRICT COURT DOCKET

ORREGO v. KNIPFING, et al.

United States District Court Eastern District of New York

Case No. 2:20-cv-03361

DOCUMENT

Official Civil Docket

PURPOSE AND RELEVANCE

Provides the official procedural chronology of the District Court proceeding and permits the Judicial Council to locate and verify the docket entries cited throughout the Complaint, Statement of Facts, and Exhibits 1–12.

The docket includes the summary-judgment proceedings; Plaintiff's Opposition and own Motion for Summary Judgment; documentary and electronic evidence; the November 17, 2025 recusal and random reassignment; DE [240]; the post-recusal purported acts docketed as DE [244] and DE [245]; DE [246]; and subsequent docket activity.

SUPPLEMENTAL RECORD — SR-1
OFFICIAL COURT RECORD — NOT A SEPARATE EXHIBIT

U.S. District Court
Eastern District of New York (Central Islip)
CIVIL DOCKET FOR CASE #: 2:20-cv-03361-SJB-AYS

Orrego v. Knipfing et al
Assigned to: Judge Sanket J. Bulsara
Referred to: Magistrate Judge Anne Y. Shields
related Cases: [2:26-mc-01957-SJB](#)

Date Filed: 07/23/2020
Date Terminated: 05/08/2026
Jury Demand: Plaintiff
Nature of Suit: 442 Civil Rights: Jobs
Jurisdiction: Federal Question

[2:25-cv-00769-SJB-AYS](#)

[2:25-cv-00736-SJB-AYS](#)

[2:24-cv-07247-SJB-AYS](#)

[2:23-cv-06507-SJB-AYS](#)

Cause: 42:2000e Job Discrimination (Employment)

Date Filed	#	Docket Text
02/06/2025	186	MOTION to Compel <i>Re: Plaintiffs Request to Lift the Stays in the 2020 and 2023 Cases and Reinstate Motions</i> by Lidia M. Orrego. (AMF) (Entered: 02/06/2025)
02/12/2025	187	Notice of Related Case: 25-cv-00736 The Case was directly assigned as a related Pro Se/Habeas Case. (KS) (Entered: 02/12/2025)
02/14/2025	188	Notice of Related Case: 25-cv-00769 The Case was directly assigned as a related Pro Se/Habeas Case. (KS) (Entered: 02/14/2025)
03/03/2025	189	ORDER: Plaintiff has moved to lift the stay in this case and reinstate nine administratively terminated motions 186 . For the reasons stated in the attached, the motion to lift the stay is granted. The motion to reinstate Plaintiff's prior motions is denied. The parties are directed to meet and confer and submit a proposed schedule for the completion of discovery to Judge Shields by 3/17/2025 . So Ordered by Judge Sanket J. Bulsara on 3/3/2025. (MPG) (Entered: 03/03/2025)
03/13/2025	190	MOTION to Stay , MOTION to Disqualify Counsel , MOTION for Preliminary Injunction , MOTION for Temporary Restraining Order by Lidia M. Orrego. (GO) (Entered: 03/13/2025)
03/17/2025	191	STATUS REPORT <i>In Response to the Court's Order Dated March 3, 2025</i> by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Minnah-Donkoh, Kuuku) (Entered: 03/17/2025)
03/17/2025	192	REPLY in Opposition re 191 Status Report filed by Lidia M. Orrego. (AMF) (Entered: 03/18/2025)
03/19/2025		ORDER: The Court adopts the proposed briefing schedule 191 . Any party seeking to move for summary judgment must serve its motion by 6/9/2025 ; any opposition must be served by 7/14/2025 ; and any reply must be served by 8/4/2025 . The parties should serve the papers on each other by these deadlines but only file them on the Court's docket on 8/4/2025 , following service of all briefs. The parties are otherwise reminded to follow Judge Bulsara's Individual Practices and the Local Civil Rules effective 1/2/2025. So Ordered by Judge Sanket J. Bulsara on 3/19/2025. (MPG) (Entered: 03/19/2025)
03/26/2025	193	Letter dated 3/26/2025 from Lidia M. Orrego addressed to District Judge Bulsara RE: Status of Motion to Stay, Motion for Disqualification for Fraud, Perjury, Tampering with Witness and Evidence, Preliminary Injunction, and Protective Order (Docket Entry 190), filed on March 13, 2025. (AMF) (Entered: 03/26/2025)
05/09/2025	194	Letter MOTION for pre motion conference <i>for Motion to Vacate Summary Judgment Scheduling Order, Stay Case, Disqualify Opposing Counsel, Provide Evidence Filing Instructions, and Renew Declaratory Judgment</i> by Lidia M. Orrego. (AMF) (Entered: 05/09/2025)

05/23/2025	195	Letter MOTION for Extension of Time to File (<i>Consent letter motion for extension of time with respect to all deadlines set forth in the summary judgment motion briefing schedule</i>) by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua. (Minnah-Donkoh, Kuuku) (Entered: 05/23/2025)
05/27/2025		ORDER: The motion for extension of time to file document 195 is granted. The deadlines are extended as follows: any party seeking to move for summary judgment must serve its motion by 7/9/2025 ; any opposition must be served by 8/13/2025 ; and any reply must be served by 9/3/2025 . The parties are directed to serve the papers on each other by these deadlines but only file them on the Court's docket on 9/3/2025 , following services of all briefs. So Ordered by Judge Sanket J. Bulsara on 5/27/2025. (MPG) (Entered: 05/27/2025)
06/17/2025	196	Second MOTION to Disqualify Judge / <i>NOTICE OF SECOND MOTION TO RECUSE MAGISTRATE JUDGE ANNE Y. SHIELDS PURSUANT TO 28 U.S.C. §§ 144 AND 455 AND FRCP 7(b), 72(b), AND EDNY LOCAL CIVIL RULE 7.1</i> by Lidia M. Orrego. (NF) (Entered: 06/18/2025)
06/17/2025	197	Notice of MOTION to Vacate <i>ORDERS PURSUANT TO FRCP 60(b)(2), 60(b)(6), AND 60(d)(3)</i> by Lidia M. Orrego. (NF) (Entered: 06/18/2025)
06/18/2025	198	Notice of MOTION to Vacate <i>ORDERS PURSUANT TO FRCP 60(b)(2), 60(b)(6), AND 60(d)(3)</i> by Lidia M. Orrego. (NF) (Entered: 06/18/2025)
06/30/2025	199	MOTION for Declaratory Judgment (<i>Declaratory Relief</i>) by Lidia M. Orrego. (Attachments: # 1 Part 2, # 2 Part 3) (NF) (Entered: 07/01/2025)
07/01/2025	200	Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> by Lidia M. Orrego. (NF) (Entered: 07/02/2025)
07/02/2025		ORDER: Plaintiff's motion for declaratory judgment 199 is denied. The motion was previously denied on 3/28/2023. Plaintiff has now filed a renewed motion, which is just a motion for reconsideration. As such, the motion is late because more than 14 days have passed since the prior denial. See Local Civil Rule 6.3. So Ordered by Judge Sanket J. Bulsara on 7/2/2025. (MPG) (Entered: 07/02/2025)
07/03/2025	201	RESPONSE to Motion re 200 Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> filed by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Old Westbury LLC, Teresa A. Zantua. (Minnah-Donkoh, Kuuku) (Entered: 07/03/2025)
07/07/2025		ORDER: The motion for extension of time 200 is granted. The summary judgment briefing is extended as follows: any party seeking to move for summary judgment must serve its motion by 8/8/2025 ; any opposition must be served by 9/12/2025 ; and any reply must be served by 10/3/2025 . The parties are directed to serve the papers on each other by these deadlines but only file them on the Court's docket on 10/3/2025 , following service of all briefs. So Ordered by Judge Sanket J. Bulsara on 7/7/2025. (MPG) (Entered: 07/07/2025)
07/07/2025	202	Notice of Request to Submit Electronic Evidence. re 200 Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> by Lidia M. Orrego. (NF) (Entered: 07/08/2025)
07/08/2025	203	Notice of MOTION to Disqualify Judge / <i>Recuse</i> , Notice of MOTION to Vacate <i>July 2, 2025 Order</i> by Lidia M. Orrego. (NF) (Entered: 07/08/2025)
07/08/2025		ORDER: The Court has received from Plaintiff multiple requests to submit electronic evidence. The protocol for submission of large electronic files set forth in the Court's Individual Practices § II.D, however, is only to be utilized for trial or motion practice where exhibits are appropriate for the Court's consideration of the issues involved, such as summary judgment. Both sides are therefore informed that, outside of such limited practice, documents should be filed only on ECF. Emails to Chambers are generally prohibited. <i>See</i> Individual Practices § II.B. So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG) (Entered: 07/08/2025)
07/08/2025		ORDER: Plaintiff has filed multiple motions, <i>e.g.</i> , motions to disqualify opposing counsel, motions to stay, motions to vacate prior orders, and a motion to disqualify Judge Shields 190 , 194 , 196 , 197 , 198 , 200 . Many of these motions are attempts to relitigate issues already decided in this case. The proper

		vehicle for such action is to file an appeal at the appropriate time with the Second Circuit Court of Appeals. This Court will not reconsider or undo any order issued by a prior judge in this case from before its transfer to the undersigned. Accordingly, Plaintiff may not file any further motions seeking reconsideration or a redo of prior decisions. At this point in the litigation, the parties are briefing cross-motions for summary judgment—motions which the Court will decide in a timely fashion and which will determine whether this case proceeds to trial or judgment in favor of Plaintiff or Defendants. Filings unrelated to summary judgment—which attempt to relitigate prior decisions—distract from orderly and efficient resolution of the case to a final disposition. Should Plaintiff continue to file motions for reconsideration (or motions in the guise of reconsideration motions) the Court may unfortunately have to prohibit and suspend her ECF filing privileges. <i>See Trivedi v. Gen. Elec. Co.</i> , No. 23-254, 2024 WL 3286663, at *2 (2d Cir. July 3, 2024) (warning pro se litigant "if she continues to abuse the judicial process by the instigation of frivolous appeals, an injunction will issue directing the Clerk of this Court to refuse to accept for filing any submissions from her, unless she has first obtained leave of the Court to file such papers." (cleaned up) (quoting <i>Sassower v. Sansverie</i> , 885 F.2d 9, 11 (2d Cir. 1989)). This is a step the Court does not wish to take but may have no choice. (Of course, because the summary judgment motions have not yet been decided, Plaintiff may file a motion for reconsideration, consistent with Local Rule 6.3, should she disagree with some aspect of the decision rendered on such motions). Because the motions attempt to relitigate all of the issues previously decided in this case, well after the time for reconsideration, <i>see</i> Local Civil Rule 6.3, the motions at Docket Nos. 190 , 194 , 196 , 197 , 198 , 200 are all denied. The Court will proceed to resolve the summary judgment motions following submission of those papers consistent with the briefing schedule (as amended by the Court). So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG) (Entered: 07/08/2025)
07/10/2025	204	Letter Motion Objection and Clarification to Order Dated July 8, 2025 (NF) (Entered: 07/10/2025)
07/11/2025		ORDER: The Court is in receipt of Plaintiff's letter motion objection to its prior order 204 . To be clear, the Court is not imposing any restriction on Plaintiff's ability to make any argument (or present any evidence) in support of her motion for summary judgment (or in opposition to Defendants' motion for summary judgment). The only restriction on summary judgment is on the length of the memoranda of law, which has word limits, by virtue of Local Civil Rule 7.1. And Plaintiff (and Defendants) may submit evidence, in the form of Rule 56.1 statements (and exhibits thereto), in connection with summary judgment. What Plaintiff (and Defendants) cannot do is relitigate or reargue decisions that have already been made—which is why the Court denied the motions to reconsider decisions which, in some instances, were made years ago. Such reconsideration is barred by Local Civil Rule 6.3, which requires reconsideration motions to be filed within 14 days of the initial decision (and reconsideration may only be sought once). To reconsider decisions already made, as previously noted, requires the Court to move backwards, and prevents the case from moving forward. To the extent that Plaintiff has new evidence, it should be presented in connection with the summary judgment briefing. The Court looks forward to reviewing and deciding the summary judgment papers so the case can either proceed to trial or be resolved at this stage. So Ordered by Judge Sanket J. Bulsara on 7/11/2025. (MPG) (Entered: 07/11/2025)
07/21/2025	206	NOTICE from Lidia Orrego RE: Petition for Writ of Mandamus, Motion for Permission to Appeal In Forma Pauperis, and Certificate of Service, submitted to the United States Court of Appeals for the Second Circuit on 7/16/2025. (Attachments: # 1 Part 2, # 2 Part 3, # 3 Part 4) (NF) (Entered: 07/23/2025)
07/23/2025	205	Letter MOTION to Vacate <i>Orders Dated July 8, 2025, For Recusal of District Judge Bulsara and Magistrate Judge Shields for Due Process Violations, For Leave to File a Second Amended Complaint, to Stay Proceedings, and to Vacate any Summary Judgment Scheduling Order</i> by Lidia M. Orrego. (NF) (Entered: 07/23/2025)
07/24/2025		ORDER: For the reasons stated in the Court's previous Orders, including on 7/8/2025 and 7/11/2025, the motion to vacate 205 is denied. So Ordered by Judge Sanket J. Bulsara on 7/24/2025. (MPG) (Entered: 07/24/2025)
08/05/2025	207	Emergency MOTION to Vacate <i>Objecting to Order Dated July 24, 2025, Denying DE 205 , for Due Process Violations Arising from Orders Dated July 8, 2025, and July 11, 2025, Reaffirmation of Recusal of District Judge Bulsara and M. Judge Shields, to Vacate Schedule for Summary Judgment Due to Defendants' Fraud Confirmed by NYS ATTORNEY GENERAL LETITIA JAMES, and Relief Requested in DE 205 - To Set the Record of Due Process Violations and Judicial Impropriety</i> by Lidia M. Orrego. (Attachments: # 1 Part 2) (NF) (Entered: 08/05/2025)

08/08/2025	208	Letter <i>regarding service of Defendants' motion for summary judgment on Plaintiff</i> by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Minnah-Donkoh, Kuuku) (Entered: 08/08/2025)
08/11/2025	209	NOTICE of Filing of Plaintiff's Motion for Summary Judgment filed by Lidia M. Orrego. (NF) (Entered: 08/11/2025)
08/14/2025	210	ORDER: The motion 207 is denied for the reasons stated in the attached, and Plaintiff is enjoined from making additional filings in this case, absent court order, and as set forth in the attached filing injunction. So Ordered by Judge Sanket J. Bulsara on 8/14/2025. (MPG) (Entered: 08/14/2025)
09/09/2025	211	MOTION for Leave to File Document <i>New Proceedings Based on New Evidence - Workers' Compensation Fraud by Shimme Inc. and Others; Deprivation of Rights by Attorney General Letitia James and Governor Kathy Hochul</i> by Lidia M. Orrego. (NF) (Entered: 09/11/2025)
09/11/2025	212	NOTICE OF INTERLOCUTORY APPEAL as to 210 Order on Motion to Vacate, by Lidia M. Orrego. (KS) (Entered: 09/15/2025)
09/11/2025	213	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Main Document 213 replaced on 9/22/2025) (LF). (Entered: 09/15/2025)
09/15/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. 212 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 09/15/2025)
09/16/2025	214	ORDER: On September 11, 2025, Lidia Orrego, acting pro se, filed a Notice of Interlocutory Appeal 212 of this Court's August 14, 2025 Order 210 together with an application to proceed <i>in forma pauperis</i> ("IFP") 213 . However, Orrego used the form application for IFP status in the district court rather than Form 4 of the Appellate Appendix of Forms. Upon review, it is apparent that the present application lacks the information required by Federal Rule of Appellate Procedure 24(a)(1). Accordingly, the application to proceed IFP 213 is denied without prejudice and with leave to renew on the Circuit Court's Form 4 annexed to this Order. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (RB) (Entered: 09/16/2025)
09/16/2025		ORDER: Plaintiff Orrego has now filed multiple applications seeking leave to file additional motions and/or open new cases. Though the cover letters for these motions comply with the Court's admonition that leave be sought in a short letter with a word limit, the motions attach hundreds, if not thousands of pages of material, which not only violate the filing injunction, but are unnecessarily duplicative material. The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff. The motions seeking leave, in this case at Dkt. No. 211 , are denied. Plaintiff is prohibited from making any further filings on this docket, or using the portal available to pro se litigants, absent further order of this Court (no leave may be sought). The Clerk's Office is directed to terminate Plaintiff Orrego's access to the pro se portal, to reject and promptly return to Plaintiff any motion or document submitted by her, and not to file any submission on ECF or retain custody of such material. Plaintiff is reminded that her filing of this unnecessary material has simply impeded, delayed, and obstructed the Court's ability to resolve the merits of the case, and its ability to move this case forward, to trial (if appropriate). The Court will lift this filing injunction following resolution of the pending motions in all of her cases, in order to give her an opportunity to object, appeal, or reconsider any decision, or to make any post-decision filings attendant to trial, should the Court determine that the case should proceed to trial or further discovery. But until the Court renders such decisions, the filing injunction imposed by this order will remain in place. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (RB) (Entered: 09/16/2025)
09/18/2025	215	Letter from Pro Se Department to Lidia M. Orrego dated 9/18/2025. The enclosed documents are being returned without docketing or consideration for the following reason(s): Pursuant to the enclosed electronic orders So Ordered by District Judge Bulsara on 9/16/2025 "The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff." (NF) (Entered: 09/18/2025)
09/19/2025	216	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 09/23/2025)

09/22/2025		Supplemental Electronic Index to Record on Appeal sent to US Court of Appeals. 212 Notice of Interlocutory Appeal. Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (LF) (Entered: 09/22/2025)
09/23/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. 212 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 09/23/2025)
09/30/2025	217	Letter MOTION for Leave to Appeal <i>order of the court entered on September 16, 2025</i> by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
09/30/2025	218	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
09/30/2025	219	NOTICE OF INTERLOCUTORY APPEAL as to Order on Motion for Leave to File, entered on 9/16/2025, by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
10/01/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> 216 is denied. "An appeal may not be taken <i>in forma pauperis</i> if the trial court certifies in writing that it is not taken in good faith." <i>Romero v. DHL Express, Inc.</i>, No. 15-CV-4844, 2017 WL 2266990, at *1 (S.D.N.Y. May 6, 2017) (internal quotations and citations omitted). The "good faith" standard is objective; and it is not met when a party seeks review of a frivolous claim. <i>See Coppedge v. United States</i>, 369 U.S. 438, 444-45 (1962). Here, Orrego seeks to appeal this Court's entry of a filing injunction. As this Court has repeatedly explained, the filing injunction—imposed after notice was provided—was an appropriate sanction given Orrego's repetitive filing of unnecessary material that has impeded, delayed, and obstructed the Court's ability to resolve the merits of the case. (<i>See</i> Order dated Aug. 14, 2025). The Court is prepared to lift the injunction following resolution of the pending motions in all of Plaintiff's cases. (<i>See</i> Order dated Sep. 16, 2025). A frivolous appeal of the injunction only works to further delay the resolution of these cases. The Court has reviewed the record and certifies that an appeal would not be taken in good faith. <i>See Coppedge</i>, 369 U.S. at 444-45. The application to proceed <i>in forma pauperis</i> is denied. Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this Order. The Clerk of Court is also respectfully directed to mail a copy of this Order to Orrego at her address of record and to record such service on the docket. So Ordered by Judge Sanket J. Bulsara on 10/1/2025. (RB) (Entered: 10/01/2025)
10/01/2025	220	NEF received from Court of Appeals for the Second Circuit (USCA #25-2399) re Petition for Writ Served. (Attachments: # 1 Part 2) (LF) (Entered: 10/02/2025)
10/02/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. 219 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (DC) (Entered: 10/02/2025)
10/03/2025	221	MOTION for Summary Judgment by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua. (Attachments: # 1 Rule 56.1 Statement, # 2 Declaration, # 3 Exhibit A - Plaintiff's Deposition, # 4 Exhibit B - Savitsky WCB Testimony, # 5 Exhibit C - Old Westbury Eddie, LLC, record of Incorporation, # 6 Exhibit D - Test Msgs, # 7 Exhibit E - Job Offer Letter, # 8 Exhibit F - Non-Disclosure Agreement, # 9 Exhibit G - Plaintiff's WC Application, # 10 Exhibit H - Plaintiff's Text Msgs, # 11 Exhibit I - Email Report 4, # 12 Exhibit J - Plaintiff's diary, # 13 Exhibit K - Plaintiff's Pavillion Agency Resume, # 14 Exhibit L - Plaintiff's March 5, 2021 WCB Hearing Testimony, # 15 Exhibit M - Text Msgs, # 16 Exhibit N - Plaintiff's October 26, 2018 Wage Statement, # 17 Exhibit O - November 2, 2018 Complaint, # 18 Exhibit P - Email Report 1, # 19 Exhibit Q - Email Report 2, # 20 Exhibit R - Email Report 3, # 21 Exhibit S - Email Report 5, # 22 Exhibit T - Email Report 6, # 23 Exhibit U - Email Report 7, # 24 Exhibit V - Email from Testa to Plaintiff re Investigation, # 25 Exhibit W - Email from Kevin Flannagan, # 26 Exhibit X - Termination Letter, # 27 Exhibit Y - Image of E-Folder Containing Photographs, # 28 Exhibit Z - Image of E-Folder Containing Videos, # 29 Exhibit AA - September 30, 2021 MTD Decision, # 30 Exhibit BB - March 10 2021 WCB Decision, # 31 Exhibit CC - June 21, 2021 WCB Board Panel Decision, # 32 Exhibit DD - November 2, 2023 Third Department Decision, # 33 Exhibit EE - Plaintiff's June 2021 Inspector General Complaint, # 34 Exhibit

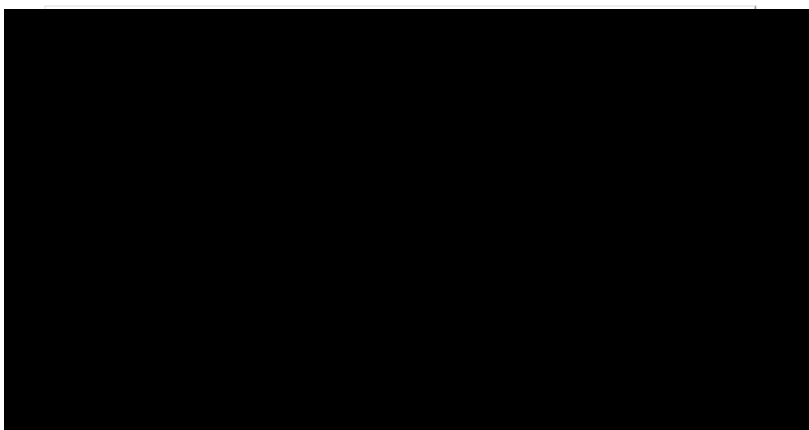
		FF - Plaintiff's June 2021 NYSDOH Complaint, # 35 Exhibit GG - Plaintiff's July 2021 NYSCJC Complaint, # 36 Exhibit HH 0 Plaintiff's February 2023 State Court Complaint, # 37 Exhibit II - Transcript of February 2025 Proceeding, # 38 Exhibit JJ - April 2025 Decision, # 39 Exhibit KK - April 2025 Dismissal, # 40 Exhibit LL - Plaintiff's July 2024 State Court Complaint, # 41 Exhibit MM - June 2020 NCDSS Notice Ltrs, # 42 Exhibit NN - July 2020 NYS OCFS ltrs, # 43 Exhibit OO - Plaintiff's December 2020 Complaint against Debra Karpfntiff's March 2024 Ltr to NCDSS, # 44 Exhibit PP- Plaintiff's March 2024 Ltr to NCDSS, # 45 Exhibit QQ - Plaintiff's December 2024 Nassau County Article 78 Petition, # 46 Exhibit RR - April 2025 Nassau County Supreme Court Decision, # 47 Exhibit SS - Plaintiff's March 2021 Queens County Supreme Court Complaint, # 48 Exhibit TT - July 2025 Second Department Decision, # 49 Exhibit UU - March 2021 NYSDHR Determination and Order of Dismissal of Administrative Convenience, # 50 Exhibit VV - Plaintiff's August 2021 Queens County Supreme Court Complaint against Ley Family, # 51 Exhibit WW - Plaintiff's June 2020 Letter to the Derek Smith Law Group, # 52 Exhibit XX - Plaintiff's June 2020 Letter to Borrelli & Associates, # 53 Exhibit YY - Plaintiff's April 2020 Letter to Law Office of Peter A. Romero, # 54 Memorandum in Support, # 55 Exhibit Notice to Pro Se Litigation Who Opposed a Motion for Summary Judgment) (Minnah-Donkoh, Kuuku) (Entered: 10/03/2025)
10/03/2025	222	REPLY in Support re 221 MOTION for Summary Judgment filed by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua. (Minnah-Donkoh, Kuuku) (Entered: 10/03/2025)
10/03/2025	223	Letter MOTION for Leave to File Document <i>Motion for Summary Judgment</i> by Lidia M. Orrego. (NF) (Entered: 10/03/2025)
10/03/2025	224	AFFIRMATION of Lidia M. Orrego in Opposition re 221 Defendants' MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # 1 Affidavit in Support of Authentication of Evidence and Certifications Government Agencies, # 2 Plaintiff's Counterstatement of Material Facts Pursuant to Local Civil Rule 56.1 in Opposition to Defendants' Motion for Summary Judgment, # 3 Memorandum of Law in Opposition Defendants' Motion for Summary Judgment, # 4 Exhibit 1, # 5 Exhibit 2, # 6 Exhibit 3, # 7 Exhibit 4, # 8 Exhibit 5, # 9 Exhibit 6, # 10 Exhibit 7, # 11 Exhibit 8, # 12 Exhibit 9, # 13 Exhibit 10, # 14 Exhibit 11, # 15 Exhibit 12, # 16 Exhibit 13, # 17 Exhibit 14, # 18 Exhibit 15, # 19 Exhibit 16, # 20 Exhibit 17, # 21 Exhibit 18, # 22 Exhibit 19, # 23 Exhibit 20, # 24 Exhibit 21, # 25 Exhibit 22, # 26 Exhibit 24, # 27 Exhibit 25, # 28 Exhibit 26, # 29 Exhibit 27, # 30 Exhibit 28, # 31 Exhibit 29, # 32 Exhibit 30, # 33 Exhibit 31, # 34 Exhibit 32, # 35 Exhibit 33, # 36 Exhibit 34, # 37 Exhibit 35, # 38 Exhibit 36, # 39 Exhibit 37, # 40 Exhibit 38, # 41 Exhibit 39, # 42 Exhibit 40, # 43 Exhibit 41, # 44 Affirmation of Service) (NF) (Entered: 10/06/2025)
10/06/2025		ORDER: Pro se Plaintiff Orrego's request for leave to file her fully briefed motion for summary judgment 223 is denied as moot. Orrego's summary judgment motion is not subject to the Court's August 14, 2025 filing injunction 210 , and permission is not required to file. The Clerk is directed to docket the summary judgment briefing. So Ordered by Judge Sanket J. Bulsara on 10/6/2025. (RB) (Entered: 10/06/2025)
10/06/2025	225	Letter <i>requesting the Clerk to (i) reclassify Plaintiff's filing (ECF No. 209) from a Notice to a Motion for Summary Judgment, or (ii) advise how the opposition should be filed under the current classification of same</i> by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Minnah-Donkoh, Kuuku) (Entered: 10/06/2025)
10/06/2025	226	Notice of MOTION for Summary Judgment by Lidia M. Orrego. (Attachments: # 1 Notice of Motion for Summary Judgment, # 2 Affirmation of Lidia M.Orrego in Support of Local Rule 56.1 Statement and Motion for Summary Judgment, # 3 Plaintiff's Local Rule 56.1 Statement of Undisputed Material Facts, # 4 Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment, # 5 List Exhibits Summary Judgment, # 6 Exhibit 1, # 7 Exhibit 2, # 8 Exhibit 3, # 9 Exhibit 4, # 10 Exhibit 5, # 11 Exhibit 6, # 12 Exhibit 7, # 13 Exhibit 8, # 14 Exhibit 9, # 15 Exhibit 10, # 16 Exhibit 11, # 17 Exhibit 12, # 18 Exhibit 13, # 19 Exhibit 14, # 20 Exhibit 15, # 21 Exhibit 16, # 22 Exhibit 17, # 23 Exhibit 18, # 24 Exhibit 19, # 25 Exhibit 20, # 26 Exhibit 21, # 27 Exhibit 22, # 28 Exhibit 23, # 29 Exhibit 24, # 30 Exhibit 25, # 31 Exhibit 26) (NF) (Entered: 10/07/2025)
10/06/2025	227	DECLARATION OF Kuuku Minnah-Donkoh in Opposition re Plaintiff's 226 Notice of MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # 1 Declaration of Kuuku Minnah-Donkoh in Opposition to Plaintiff's Motion for Summary Judgment, # 2 Defendant's Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment, # 3 Defendant's Responses to Plaintiff's Local Rule 56.1 Statement of Undisputed Material Facts, # 4 Exhibit ZZ) (NF) (Entered: 10/08/2025)

10/06/2025	228	REPLY in Support re 226 Notice of MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # 1 Plaintiff's Affirmation of Authentication of Exhibits 26-47, # 2 Plaintiff's Reply Defendants' Local Rule 56.1 Statement of Undisputed Material Facts Fated September 12, 2025, # 3 Plaintiff's Reply Memorandum of Law in Support of Motion for Summary Judgment, # 4 Exhibit 26, # 5 Exhibit 27, # 6 Exhibit 28, # 7 Exhibit 29, # 8 Exhibit 30, # 9 Exhibit 31, # 10 Exhibit 32, # 11 Exhibit 33, # 12 Exhibit 34, # 13 Exhibit 35, # 14 Exhibit 36, # 15 Exhibit 37, # 16 Exhibit 38, # 17 Exhibit 39, # 18 Exhibit 40, # 19 Exhibit 41, # 20 Exhibit 42, # 21 Exhibit 43, # 22 Exhibit 44, # 23 Exhibit 45, # 24 Exhibit 46, # 25 Exhibit 47) (NF) (Entered: 10/08/2025)
10/06/2025	229	NOTICE: The Clerks Office received the attached USB in support of 226 , 227 and 228 ; Original USB and has been sent to Judge Bulsara's chambers. (GO) (Entered: 10/08/2025)
10/06/2025		The Clerks Office is in receipt of the Pro Se Filings 226 , 227 and 228 . The cover letter states that the pro se litigant included the following: "4. Plaintiff's Opposition to Defendants' Motion for Summary Judgment (served September 12, 2025) Pages 1 - 1004"; AND "USB Flash Drive "EASTFUN" 32GB Blue Submission" . After careful review of the documents, the clerks office was NOT provided with said documents. (GO) (Entered: 10/08/2025)
10/21/2025	230	MOTION for Leave to File Document <i>a Sur-Reply or Motion to Strike Based on Defendants' Non-Compliance with Local Rule 56.1(c), Warranting Admission of Plaintiff's Facts Under Rule 56.1(d), and to Strike 129-178 Pursuant to FRCP 12(f), FRCP 37, and FRE 403; and, for the record, Leave Noted Regarding the Court's Refusal of Plaintiff's Revised Opposition Under FRCP 15(a)(2) - "freely give[n] when justice so requires" (DE 115) attached Filed October 10, 2025, Returned October 20, 2025. by Lidia M. Orrego. (NF) (Entered: 10/21/2025)</i>
10/21/2025	231	Letter in Response/Clarification to 10/6/2025 Docket Entry by Lidia M. Orrego (NF) (Entered: 10/22/2025)
10/22/2025		ORDER: The motion for leave 230 to file a sur-reply or motion to strike is denied. So Ordered by Judge Sanket J. Bulsara on 10/22/2025. (RB) (Entered: 10/22/2025)
11/05/2025		ORDER: In light of the impending reassignment of this case, the current motions, 203 , 217 , 218 , 221 , and 226 , are deemed withdrawn and should be refiled consistent with the individual practices of the new Judge(s) and only with permission of the newly assigned Judge(s). So Ordered by Judge Sanket J. Bulsara on 11/5/2025. (RB) (Entered: 11/05/2025)
11/17/2025		ORDER OF RECUSAL. Type of Recusal: party. Ordered by Judge Sanket J. Bulsara on 11/17/2025. Judge Sanket J. Bulsara, Magistrate Judge Anne Y. Shields recused. Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings. (BBM) (Entered: 11/17/2025)
11/18/2025	232	Letter MOTION for pre motion conference (<i>Urgent Request</i>) <i>To Vacate Unlawful Pre-Filing Injunctions and to Restore Constitutional and Statutory Filing Rights/w-Exhibits</i> filed by Lidia M. Orrego. (MLR) (Entered: 11/20/2025)
11/26/2025		Case Reassigned to Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields. Judge Pamela K. Chen, Magistrate Judge Taryn A. Merkl no longer assigned to the case. Please download and review the Individual Practices of the assigned Judges, located on our website . Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (BBM) (Entered: 11/26/2025)
11/26/2025		ORDER: The Court will be issuing orders deciding the previously filed motions. No refiling of motions is necessary. Nor is any party permitted to call Chambers to inquire about the status of previously filed motions. The Court will be issuing further decisions and orders in due course. The litigation bar previously entered, 210 , remains in place. Furthermore, no new motions, letters, or other requests may be filed by any party until further Court management orders are issued next week. So Ordered by Judge Sanket J. Bulsara on 11/26/2025. (RB) (Entered: 11/26/2025)
12/03/2025		ORDER: The Court issues the following case management order. The Court will decide all currently pending motions, including those recently reinstated, in due course. Neither party may make any additional filings on this docket until the Court decides the pending matters. So Ordered by Judge Sanket J. Bulsara on 12/3/2025. (RB) (Entered: 12/03/2025)
12/05/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> ("IFP") 218 is denied for the reasons set forth in the Court's October 1, 2025 Order in this case, and the Court's June 10, 2025

		Order in a related case initiated by Orrego. (<i>See also Orrego v. Kerrigan</i> , No. 25-CV-0736 (E.D.N.Y. June 10, 2025), Dkt. No. 11 (denying IFP and listing all of Orrego's prior IFP applications, all of which have been denied)). Orrego again seeks IFP status to appeal the filing injunction in this case, which is substantially similar to the subject of the request the Court denied on October 1, 2025. The Court has reviewed the record and certifies that an appeal would not be taken in good faith and IFP status is denied for the purposes of such an appeal. <i>See Coppedge v. United States</i> , 369 U.S. 438, 444-45 (1962). Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this order. The Clerk of Court is also respectfully directed to mail a copy of this order to Orrego at her address of record and to record such service on the docket. Other motions remain pending, and the filing pause set by the Court's December 3, 2025 case management order remains in place. So Ordered by Judge Sanket J. Bulsara on 12/5/2025. (RB) (Entered: 12/05/2025)
12/10/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. 212 Notice of Interlocutory Appeal, 219 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (GO) (Entered: 12/10/2025)
12/22/2025	233	Letter request (KS) (Entered: 12/23/2025)
12/22/2025	234	NOTICE OF INTERLOCUTORY APPEAL by Lidia M. Orrego. (KS) (Entered: 12/23/2025)
12/22/2025	235	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 12/23/2025)
12/23/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. 234 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 12/23/2025)
12/29/2025	236	USCA NOTICE re 235 MOTION for Leave to Appeal in forma pauperis. An appeal in the above-referenced case has been docketed in the Court of Appeals. According to the district court docket sheet or other available information, appellant has moved for leave to proceed in forma pauperis in the district court on December 22, 2025, and that motion is pending. The appeal may not move forward until the motion is determined. Please direct the motion to the appropriate judge for determination. Upon the grant or denial of the motion, please enter the order and transmit it to the Court of Appeals. 12/29/2025. USCA# 25-3217. (VJ) (Entered: 12/29/2025)
12/30/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> ("IFP") 235 is denied for the reasons set forth in the Court's December 5, 2025 Order. The Court has reviewed the record and certifies that an appeal would not be taken in good faith and IFP status is denied for the purposes of such an appeal. <i>See Coppedge v. United States</i> , 369 U.S. 438, 444-45 (1962). Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this order. The Clerk of Court is also respectfully directed to mail a copy of this order to Orrego at her address of record and to record such service on the docket. Other motions remain pending, and the filing pause set by the Courts December 3, 2025 case management order remains in place. So Ordered by Judge Sanket J. Bulsara on 12/30/2025. (RB) (Entered: 12/30/2025)
01/02/2026		Supplemental Electronic Index to Record on Appeal sent to US Court of Appeals. 234 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (LF) (Entered: 01/02/2026)
03/18/2026	237	MANDATE of USCA 25-1802 as to 234 Notice of Interlocutory Appeal filed by Lidia M. Orrego. Petitioner, pro se, has filed petitions for a writ of mandamus and moves for leave to proceed in forma pauperis in these consolidated petitions. Upon due consideration, it is hereby ORDERED that the motions for leave to proceed in forma pauperis are GRANTED for the purpose of filing the mandamus petitions. It is further ORDERED that the mandamus petitions are DENIED because Petitioner has not demonstrated that she lacks an adequate, alternative means of obtaining relief, that her right to the writ is clear and indisputable, and that granting the writ is appropriate under the circumstances. See <i>Cheney v. U.S. Dist. Ct. for D.C.</i> , 542 U.S. 367, 38081 (2004). (KS) (Entered: 03/18/2026)
03/24/2026		ORDER: Plaintiff Orrego's July 8, 2025 motion, 203 , is denied, for the reasons discussed in the Court's July 8, 2025 Order. So Ordered by Judge Sanket J. Bulsara on 3/24/2026. (RB) (Entered: 03/24/2026)

03/31/2026	238	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (Attachments: # 1 letter) (KS) (Entered: 04/06/2026)
03/31/2026	239	NOTICE OF INTERLOCUTORY APPEAL as to Order on Motion to Disqualify Judge, Order on Motion to Vacate by Lidia M. Orrego. (KS) (Entered: 04/06/2026)
04/06/2026		Electronic Index to Record on Appeal sent to US Court of Appeals. 239 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 04/06/2026)
04/08/2026	240	NOTICE OF INTERLOCUTORY APPEAL (Corrected Version - Wet Signature) as to Order on Motion to Disqualify Judge, Order on Motion to Vacate by Lidia M. Orrego. (GO) (Entered: 04/08/2026)
04/08/2026		Electronic Index to Record on Appeal sent to US Court of Appeals. 240 Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (GO) (Entered: 04/08/2026)
04/09/2026	241	NOTICE re 238 MOTION for Leave to Appeal in forma pauperis. An appeal in the above-referenced case has been docketed in the Court of Appeals. According to the district court docket sheet or other available information, appellant has moved for leave to proceed in forma pauperis in the district court on March 31, 2026, and that motion is pending. The appeal may not move forward until the motion is determined. Please direct the motion to the appropriate judge for determination. Upon the grant or denial of the motion, please enter the order and transmit it to the Court of Appeals. 4/9/2026. USCA# 26-899. (VJ) (Entered: 04/09/2026)
05/05/2026	242	Letter to Judge Bulsara regarding Plaintiff's conduct by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Attachments: # 1 Exhibit A - Summons and Complaint, # 2 Exhibit B - Screenshot of Facebook Post) (Minnah-Donkoh, Kuuku) (Entered: 05/05/2026)
05/06/2026	243	MANDATE of USCA as to 240 Notice of Interlocutory Appeal filed by Lidia M. Orrego, 239 Notice of Interlocutory Appeal filed by Lidia M. Orrego. This Court has determined sua sponte that it lacks jurisdiction over these appeals (consolidated and in tandem) because a final order has not been issued by the district court as contemplated by 28 U.S.C. § 1291. See <i>Petrello v. White</i> , 533 F.3d 110, 113 (2d Cir. 2008). Upon due consideration, it is hereby ORDERED that the appeals are DISMISSED in 25-2225 (L), 25-2434 (Con), 25-3217 (Con), 25-2239 (L), 25-2437 (Con), and 25-3208 (Con). It is further ORDERED that Appellants motions in both consolidated appeals are DENIED as moot. To the extent we construe the Appellants motion as a petition for mandamus, it is DENIED. See <i>Hong Mai Sa v. Doe</i> , 406 F.3d 155, 158 (2d Cir. 2005). (KS) (Entered: 05/06/2026)
05/08/2026	244	ORDER: As explained in the attached, Defendants' motion for summary judgment, 221 , is granted, and Orrego's motion for summary judgment, 226 , is denied. Orrego's pending motion for leave to appeal <i>in forma pauperis</i> , 238 , is denied for the reasons set forth in the Court's December 5, 2025 Order, and the pending premotion conference request, 232 , is denied as moot. The Court also institutes a filing injunction against Orrego. The Clerk of Court is directed to open a miscellaneous case entitled "In re Orrego," and to file a copy of this Order under that docket number. The matter is then to be administratively closed. Any future filings by Orrego, including any motion for reconsideration, shall be filed under that miscellaneous docket number. The Court will review each filing. If the filing is found to be frivolous, no further action will be taken. If the filing states a claim that is not frivolous or does not fail to state a claim, the Court will direct the Clerk of Court to open a new civil matter in which the filing will be docketed, and the matter will proceed as a new case in the ordinary course. The present filing injunction is lifted solely for the purpose of filing any notice of appeal. Aside from filings related to her appeal, Orrego is enjoined from further filings in this case, and from initiating future actions in the Eastern District of New York absent a Court order. The Clerk of Court is directed to distribute this memorandum and order to all Clerk's Office personnel as appropriate. So Ordered by Judge Sanket J. Bulsara on 5/8/2026. (RB) (Entered: 05/08/2026)
05/08/2026	245	JUDGMENT: It is ORDERED AND ADJUDGED that Plaintiff Lidia M. Orrego take nothing of Defendants Kevin Knipfing, Stephanieanna James-Knipfing, Old Westbury EDDIC LLC, Old Westbury

		LLC, Steven Savitsky and Teresa A. Zantura; that Defendants motion for summary judgment is granted; that Plaintiffs motion for summary judgment is denied; that Plaintiffs motion for leave to appeal in forma pauperis is denied; that the Court lifts the permanent filing injunction on Plaintiff Orrego solely for the purpose of filing any notice of appeal; that Orrego is enjoined from further filings in this case and initiating future actions in the Eastern District of New York absent a Court order; and that this case is closed. Ordered by Clerk of Court on 5/8/2026. (JC) (Entered: 05/08/2026)
06/01/2026	246	NOTICE OF APPEAL as to 245 Judgment,, 244 Order on Motion for Summary Judgment,,,,,,,,,,,,, Order on Motion for Pre Motion Conference,,,,,,,,, Order on Motion for Leave to Appeal in forma pauperis,,,,,,,,, by Lidia M. Orrego. Filing fee \$ 605. (DC) (Main Document 246 replaced on 6/8/2026) (DC). (Entered: 06/05/2026)
06/01/2026		APPEAL FILING FEE DUE re 246 Notice of Appeal, Payment in the amount of \$605.00, can be made in person to the clerks office, or mailed in or paid online with the event <i>Civil Case Appeal Filing Fee</i> . (DC) (Entered: 06/05/2026)
06/05/2026		Electronic Index to Record on Appeal sent to US Court of Appeals. 246 Notice of Appeal, Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (DC) (Entered: 06/05/2026)



SR-2
OFFICIAL MISCELLANEOUS PROCEEDING DOCKET

IN RE ORREGO

**United States District Court
Eastern District of New York**

Miscellaneous Case No. 2:26-mc-01957-SJB

DOCUMENT

Official Miscellaneous Proceeding Docket

PURPOSE AND RELEVANCE

Documents the opening and administrative termination of the miscellaneous proceeding on May 8, 2026, together with the filings subsequently docketed in that proceeding, including Plaintiff's June 24, 2026 Motion to Vacate, MC DE [6], and related supervisory, emergency, and administrative submissions.

The docket facilitates review of the handling of Plaintiff's post-judgment and post-recusal filings and identifies the miscellaneous proceeding in which the Motion to Vacate and related submissions were placed.

**SUPPLEMENTAL RECORD — SR-2
OFFICIAL COURT RECORD — NOT A SEPARATE EXHIBIT**

U.S. District Court
Eastern District of New York (Central Islip)
CIVIL DOCKET FOR CASE #: 2:26-mc-01957-SJB

Orrego
Assigned to: Judge Sanket J. Bulsara
related Case: [2:20-cv-03361-SJB-AYS](#)

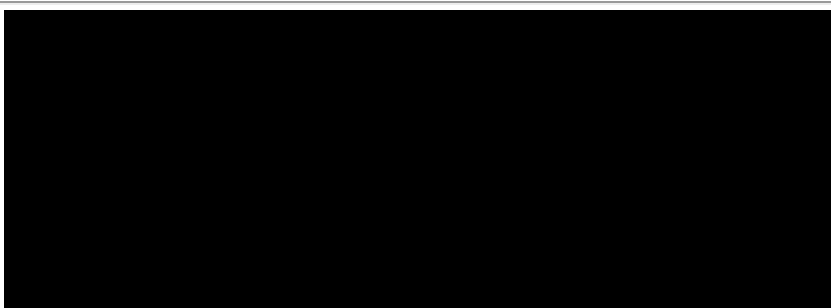
Date Filed: 05/08/2026
Date Terminated: 05/08/2026

In Re**Orrego**

represented by **Orrego**
Lidia M. Orrego
95-08 Queens Blvd
Apart 3E
Rego Park, NY 11374
Email: liorrego@gmail.com
PRO SE

Date Filed	#	Docket Text
05/05/2026	2	PLAINTIFF'S SUPPLEMENTAL DECLARATION IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT by Lidia Orrego (NF) (Entered: 05/08/2026)
05/05/2026	3	PLAINTIFF'S NOTICE OF DEFENDANTS' COUNSEL'S VIOLATION OF COURT ORDERS DE 210 AND DE NOVEMBER 26, 2025 AND NOTICE OF CORRECTION OF RECORD by Lidia Orrego (NF) (Entered: 05/08/2026)
05/08/2026	1	NOTICE of MEMORANDUM AND ORDER filed in case 20-cv-3361-SJB on May 8, 2026. ORDER: As explained in the attached, Defendants' motion for summary judgment, 221, is granted, and Orrego's motion for summary judgment, 226, is denied. Orrego's pending motion for leave to appeal in forma pauperis, 238, is denied for the reasons set forth in the Court's December 5, 2025 Order, and the pending premotion conference request, 232, is denied as moot. The Court also institutes a filing injunction against Orrego. The Clerk of Court is directed to open a miscellaneous case entitled "In re Orrego," and to file a copy of this Order under that docket number. The matter is then to be administratively closed. Any future filings by Orrego, including any motion for reconsideration, shall be filed under that miscellaneous docket number. The Court will review each filing. If the filing is found to be frivolous, no further action will be taken. If the filing states a claim that is not frivolous or does not fail to state a claim, the Court will direct the Clerk of Court to open a new civil matter in which the filing will be docketed, and the matter will proceed as a new case in the ordinary course. The present filing injunction is lifted solely for the purpose of filing any notice of appeal. Aside from filings related to her appeal, Orrego is enjoined from further filings in this case, and from initiating future actions in the Eastern District of New York absent a Court order. The Clerk of Court is directed to distribute this memorandum and order to all Clerk's Office personnel as appropriate. So Ordered by Judge Sanket J. Bulsara on 5/8/2026. (GO) (Entered: 05/08/2026)
05/08/2026		Incomplete ACO Case Termination/Statistical/Non Reportable Closing. (GO) (Entered: 05/08/2026)
06/05/2026	4	APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI addressed to the Honorable Sonia Sotomayor dated 6/3/2026 by Lidia M. Orrego (NF) (Entered: 06/05/2026)
06/24/2026	5	Notification of 172-Day Post-Recusal Void Period and Motion to Vacate Filed June 24, 2026 - Administrative Supervisory Notice Pursuant to 28 U.S.C. § 137 by Lidia Orrego (NF) (Entered: 06/24/2026)

		07/02/2026)
06/24/2026	6	NOTICE OF MOTION TO VACATE PURSUANT TO FED. R. CIV. P. 60(b)(3), 60(b)(4), 60(b)(6), AND 60(d)(3), AND FOR AN INDICATIVE RULING PURSUANT TO FED. R. CIV. P. 62.1 by Lidia M. Orrego (Attachments: # 1 Notice to Clerk of Court, # 2 Exhibits) (NF) (Entered: 07/02/2026)
07/02/2026	7	Administrative Supervisory Notice Pursuant to 28 U.S.C. § 137 Emergency Motions to Reopen Filed July 2, 2026 by Lidia Orrego (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	8	Letter from Lidia Orrego Re: Emergency Motions to Reopen - Rule 60(b)(2)/(4)(6) - Deadline July 2, 2026 (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	9	NOTICE TO THE CLERK OF COURT by Lidia Orrego (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	10	NOTICE OF POTENTIAL AMICUS CURIAE PARTICIPATION by Lidia Orrego (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	11	APPLICATION FOR LEAVE TO FILE MOTION TO REOPEN CASE (25-cv-736) PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 60(b)(2), 60(b)(4), AND 60(b)(6) by Lidia Orrego (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	12	NOTICE OF MOTION TO REOPEN CASE (25-cv-736) PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 60(b)(2), 60(b)(4), AND 60(b)(6) by Lidia Orrego (Attachments: # 1 Exhibits, # 2 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	13	NOTICE OF MOTION TO REOPEN CASE (25-cv-769) PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 60(b)(2), 60(b)(4), AND 60(b)(6) by Lidia Orrego (Attachments: # 1 Exhibits, # 2 Mailing Envelope) (NF) (Entered: 07/09/2026)
07/02/2026	14	COPIES of DE 7 , 8 , 9 , 10 , addressed to Judge Merkl by Lidia Orrego (Attachments: # 1 Copies addressed to Judge Brodie) (NF) (Entered: 07/09/2026)
07/02/2026	15	COPIES of DE 7 , 8 , 9 , 10 , 13 addressed to Judge Chen by Lidia Orrego (NF) (Entered: 07/09/2026)
07/07/2026	16	CORRECTED APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI addressed to the Honorable Sonia Sotomayor dated 6/30/2026 by Lidia M. Orrego (Attachments: # 1 Mailing Envelope) (NF) (Entered: 07/13/2026)
07/16/2026	17	SECOND CORRECTED APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI addressed to the Honorable Sonia Sotomayor dated 7/14/2026 by Lidia M. Orrego (Attachments: # 1 APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI, # 2 APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI, # 3 Mailing Envelope) (NF) (Entered: 07/17/2026)



SR-3
DE [240] — NOTICE OF MOTION TO RECUSE
RELATED APPELLATE RECORD

ORREGO v. KNIPFING, et al.

United States District Court
Eastern District of New York

EDNY Case No. 2:20-cv-03361

Second Circuit Appeal No. 26-899

DOCUMENT

DE [240] — Notice of Motion to Recuse and Selected Related
Appellate Record

PURPOSE AND RELEVANCE

Provides selected official District Court and appellate records concerning
DE [240] and Second Circuit Appeal No. 26-899.

These materials facilitate review of the procedural history concerning the
recusal-related proceedings and appellate review referenced throughout the
Complaint and Statement of Facts without requiring the reviewer to
retrieve those selected records separately from the District Court and
Second Circuit dockets.

SUPPLEMENTAL RECORD — SR-3
OFFICIAL COURT/APPELLATE RECORD — NOT A SEPARATE
EXHIBIT

EXHIBIT 5

Total Filed: 22 Pages

FILED
CLERK

UNITED STATES DISTRICT COURT
Eastern District of New York

2026 APR -6 PM 8:32

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Lidia M. Orrego

Plaintiff(s),

-against-

Kevin Knipfing et al.

Defendant(s).

NOTICE OF APPEAL
(Corrected Version – Wet Signature)
Re: DE 239

20-cv-3361 (SJB) (AYS)

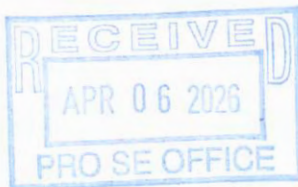
Plaintiff Lidia M. Orrego

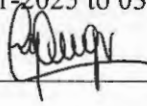
(name all parties taking the appeal)* appeal to the United States Court of Appeals for the Second Circuit from the order denying Plaintiff's motion to disqualify/recuse and from all related purported rulings or acts entered without jurisdiction (describe the order) entered

March 24, 2026 (state the date that the order was entered). This appeal is taken pursuant to 28 U.S.C. § 1291, Federal Rule of Appellate Procedure 3 and 4(a)(1)(A). Plaintiff respectfully states that this appeal is based on the collateral order doctrine as established in Cohen v. Beneficial Industrial Loan Corp. In the alternative, this filing should be construed as a petition for writ of mandamus under FRAP 21.

Plaintiff includes an attached Jurisdictional Statement and Supporting Grounds (Attachment A).

EXHIBITS: Plaintiff submits the following exhibits: Ex. 1 – 03-26-2026 Email, Order on Motion to Disqualify Ex. 2 – 07-08-2025 Email, Motion to Disqualify, Ex. 3 – 07-08-2025 Email, Order Ex. 4 – 07-08-2025 Email, Order on Motion to Stay, Ex. 5 – Docket Report (07-01-2025 to 03-30-2026)



Signature	<u>/s/Lidia M. Orrego</u> 
Name	<u>Lidia M. Orrego</u>
Prison ID	_____
Address	<u>9508 Queens Blvd., Apt. 3E</u> <u>Rego Park, NY 11374</u>
Phone	<u>(347)453-2234</u>
Email	<u>liorrego@gmail.com</u>

(Note to inmate filers: If you are an inmate confined in an institution and you seek the timing benefit of Fed. R. App. P. (4)(c) (1), complete Form 7 (Declaration of Inmate Filing) and file that declaration with this Notice of Appeal.

*See Rule 3(c) of the Federal Rules of Appellate Procedure for permissible ways of identifying appellants.

ATTACHMENT A

JURISDICTIONAL STATEMENT AND SUPPORTING GROUND

The Order denying recusal qualifies for immediate appellate review under the collateral order doctrine because it conclusively determines the disputed question of judicial disqualification, resolves an issue separate from the merits, and involves rights that would be effectively unreviewable after final judgment, particularly where continued proceedings before a disqualified judge cause irreparable harm. See *Cohen v. Beneficial Industrial Loan Corp.*; *Liljeberg v. Health Services Acquisition Corp.*

In the alternative, appellate jurisdiction is proper because the issues presented involve structural defects and lack of jurisdiction, rendering subsequent orders void. If direct appellate jurisdiction is deemed unavailable, Plaintiff respectfully requests that this filing be treated as a petition for writ of mandamus pursuant to FRAP 21, as mandamus is appropriate to review judicial disqualification and jurisdictional defects where no adequate remedy exists.

Plaintiff filed the motion to disqualify/recuse on July 8, 2025 at 4:25 PM. Within approximately three hours, the Court issued unrelated procedural orders at 7:21 PM and 7:26 PM, without addressing the recusal motion or its grounds.

The Court delayed ruling for over eight months, ultimately denying the motion on March 24, 2026, relying on those same unrelated orders rather than addressing the substantive requirements of 28 U.S.C. § 455. The Order's reliance on rulings issued within hours of the recusal motion—without first resolving the question of disqualification—renders the decision procedurally improper and inconsistent with the governing recusal standard.

The March 24, 2026 Order continues the same pattern of deprivation of rights and obstruction of justice that was the subject of Plaintiff's prior interlocutory appeal from the September 16, 2025 unlawful filing injunction (DE [219]) and is the subject of the criminal complaint filed with U.S. Attorney Joseph Nocella, Jr. on March 14, 2026 (resubmitted March 26–27, 2026) for docket alterations, concealment of records, obstruction of justice, and related violations of 18 U.S.C. §§ 1503, 1506, 2071, 2, 1512, and 1001.

The Court subsequently entered a recusal order on November 5 and 17, 2025, thereby divesting itself of jurisdiction. Any subsequent substantive actions—absent lawful reassignment—constitute purported rulings or acts entered without jurisdiction, and are void and of no legal effect.

EXHIBIT 1



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Order on Motion to Disqualify Judge

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Tue, Mar 24, 2026 at 2:04 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 3/24/2026 at 2:04 PM EDT and filed on 3/24/2026

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-SJB-AYS
Filer:
Document Number: No document attached

Docket Text:

ORDER: Plaintiff Orrego's July 8, 2025 motion, [203], is denied, for the reasons discussed in the Court's July 8, 2025 Order. So Ordered by Judge Sanket J. Bulsara on 3/24/2026. (RB)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:

EXHIBIT 2



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Motion to Disqualify Judge

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Tue, Jul 8, 2025 at 4:25 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 7/8/2025 at 4:25 PM EDT and filed on 7/8/2025

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-SJB-AYS
Filer: Lidia M. Orrego
Document Number: 203

Docket Text:

Notice of MOTION to Disqualify Judge /Recuse, Notice of MOTION to Vacate July 2, 2025 Order by Lidia M. Orrego. (NF)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlrivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename: n/a
Electronic document Stamp:

EXHIBIT 3



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Order

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Tue, Jul 8, 2025 at 7:21 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 7/8/2025 at 7:21 PM EDT and filed on 7/8/2025

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-SJB-AYS
Filer:
Document Number: No document attached

Docket Text:

ORDER: The Court has received from Plaintiff multiple requests to submit electronic evidence. The protocol for submission of large electronic files set forth in the Court's Individual Practices § II.D, however, is only to be utilized for trial or motion practice where exhibits are appropriate for the Court's consideration of the issues involved, such as summary judgment. Both sides are therefore informed that, outside of such limited practice, documents should be filed only on ECF. Emails to Chambers are generally prohibited. See Individual Practices § II.B. So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlrivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:

EXHIBIT 4



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Order on Motion to Stay

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Tue, Jul 8, 2025 at 7:26 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 7/8/2025 at 7:26 PM EDT and filed on 7/8/2025

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-SJB-AYS
Filer:
Document Number: No document attached

Docket Text:

ORDER: Plaintiff has filed multiple motions, e.g., motions to disqualify opposing counsel, motions to stay, motions to vacate prior orders, and a motion to disqualify Judge Shields [190], [194], [196], [197], [198], [200]. Many of these motions are attempts to relitigate issues already decided in this case. The proper vehicle for such action is to file an appeal at the appropriate time with the Second Circuit Court of Appeals. This Court will not reconsider or undo any order issued by a prior judge in this case from before its transfer to the undersigned. Accordingly, Plaintiff may not file any further motions seeking reconsideration or a redo of prior decisions. At this point in the litigation, the parties are briefing cross-motions for summary judgment—motions which the Court will decide in a timely fashion and which will determine whether this case proceeds to trial or judgment in favor of Plaintiff or Defendants. Filings unrelated to summary judgment—which attempt to relitigate prior decisions—distract from orderly and efficient resolution of the case to a final disposition. Should Plaintiff continue to file motions for reconsideration (or motions in the guise of reconsideration motions) the Court may unfortunately have to prohibit and suspend her ECF filing privileges. See *Trivedi v. Gen. Elec. Co.*, No. 23-254, 2024 WL 3286663, at *2 (2d Cir. July 3, 2024) (warning pro se litigant "if she continues to abuse the judicial process by the instigation of frivolous appeals, an injunction will issue directing the Clerk of this Court to refuse to accept for filing any submissions from her, unless she has first obtained leave of the Court to file such papers." (cleaned up) (quoting *Sassower v. Sansverie*, 885 F.2d 9, 11 (2d Cir. 1989)). This is a step the Court does not wish to take but may have no choice. (Of

course, because the summary judgment motions have not yet been decided, Plaintiff may file a motion for reconsideration, consistent with Local Rule 6.3, should she disagree with some aspect of the decision rendered on such motions). Because the motions attempt to relitigate all of the issues previously decided in this case, well after the time for reconsideration, see Local Civil Rule 6.3, the motions at Docket Nos. [190], [194], [196], [197], [198], [200] are all denied. The Court will proceed to resolve the summary judgment motions following submission of those papers consistent with the briefing schedule (as amended by the Court). So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlrivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:

EXHIBIT 5

[Query](#) [Reports](#) [Utilities](#) [Help](#) [Log Out](#)

PROSENEF

**U.S. District Court
Eastern District of New York (Central Islip)
CIVIL DOCKET FOR CASE #: 2:20-cv-03361-SJB-AYS**

Orrego v. Knipfing et al
Assigned to: Judge Sanket J. Bulsara
Referred to: Magistrate Judge Anne Y. Shields
related Cases: [2:25-cv-00769-SJB-AYS](#)
[2:25-cv-00736-SJB-AYS](#)
[2:23-cv-06507-SJB-AYS](#)
[2:24-cv-07247-SJB-AYS](#)

Date Filed: 07/23/2020
Jury Demand: Plaintiff
Nature of Suit: 442 Civil Rights: Jobs
Jurisdiction: Federal Question

Cause: 42:2000e Job Discrimination (Employment)

Date Filed	#	Docket Text
07/01/2025	200	Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> by Lidia M. Orrego. (NF) (Entered: 07/02/2025)
07/02/2025		ORDER: Plaintiff's motion for declaratory judgment 199 is denied. The motion was previously denied on 3/28/2023. Plaintiff has now filed a renewed motion, which is just a motion for reconsideration. As such, the motion is late because more than 14 days have passed since the prior denial. See Local Civil Rule 6.3. So Ordered by Judge Sanket J. Bulsara on 7/2/2025. (MPG) (Entered: 07/02/2025)
07/03/2025	201	RESPONSE to Motion re 200 Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> filed by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Old Westbury LLC, Teresa A. Zantua. (Minnah-Donkoh, Kuuku) (Entered: 07/03/2025)
07/07/2025		ORDER: The motion for extension of time 200 is granted. The summary judgment briefing is extended as follows: any party seeking to move for summary judgment must serve its motion by 8/8/2025 ; any opposition must be served by 9/12/2025 ; and any reply must be served by 10/3/2025 . The parties are directed to serve the papers on each other by these deadlines but only file them on the Court's docket on 10/3/2025 , following service of all briefs. So Ordered by Judge Sanket J. Bulsara on 7/7/2025. (MPG) (Entered: 07/07/2025)
07/07/2025	202	Notice of Request to Submit Electronic Evidence. re 200 Letter MOTION for Extension of Time to File Response/Reply / <i>Letter Motion For Adjournment of Summary Judgment Deadline, Status Update, Leave to File Amended Documents or Supplemental Certifications, and Briefing Schedule</i> by Lidia M. Orrego. (NF) (Entered: 07/08/2025)
07/08/2025	203	Notice of MOTION to Disqualify Judge / <i>Recuse</i> , Notice of MOTION to Vacate <i>July 2, 2025 Order</i> by Lidia M. Orrego. (NF) (Entered: 07/08/2025)

07/08/2025		ORDER: The Court has received from Plaintiff multiple requests to submit electronic evidence. The protocol for submission of large electronic files set forth in the Court's Individual Practices § II.D, however, is only to be utilized for trial or motion practice where exhibits are appropriate for the Court's consideration of the issues involved, such as summary judgment. Both sides are therefore informed that, outside of such limited practice, documents should be filed only on ECF. Emails to Chambers are generally prohibited. <i>See</i> Individual Practices § II.B. So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG) (Entered: 07/08/2025)
07/08/2025		ORDER: Plaintiff has filed multiple motions, <i>e.g.</i> , motions to disqualify opposing counsel, motions to stay, motions to vacate prior orders, and a motion to disqualify Judge Shields <u>190</u> , <u>194</u> , <u>196</u> , <u>197</u> , <u>198</u> , <u>200</u> . Many of these motions are attempts to relitigate issues already decided in this case. The proper vehicle for such action is to file an appeal at the appropriate time with the Second Circuit Court of Appeals. This Court will not reconsider or undo any order issued by a prior judge in this case from before its transfer to the undersigned. Accordingly, Plaintiff may not file any further motions seeking reconsideration or a redo of prior decisions. At this point in the litigation, the parties are briefing cross-motions for summary judgment—motions which the Court will decide in a timely fashion and which will determine whether this case proceeds to trial or judgment in favor of Plaintiff or Defendants. Filings unrelated to summary judgment—which attempt to relitigate prior decisions—distract from orderly and efficient resolution of the case to a final disposition. Should Plaintiff continue to file motions for reconsideration (or motions in the guise of reconsideration motions) the Court may unfortunately have to prohibit and suspend her ECF filing privileges. <i>See Trivedi v. Gen. Elec. Co.</i> , No. 23-254, 2024 WL 3286663, at *2 (2d Cir. July 3, 2024) (warning pro se litigant "if she continues to abuse the judicial process by the instigation of frivolous appeals, an injunction will issue directing the Clerk of this Court to refuse to accept for filing any submissions from her, unless she has first obtained leave of the Court to file such papers." (cleaned up) (quoting <i>Sassower v. Sansverie</i> , 885 F.2d 9, 11 (2d Cir. 1989)). This is a step the Court does not wish to take but may have no choice. (Of course, because the summary judgment motions have not yet been decided, Plaintiff may file a motion for reconsideration, consistent with Local Rule 6.3, should she disagree with some aspect of the decision rendered on such motions). Because the motions attempt to relitigate all of the issues previously decided in this case, well after the time for reconsideration, <i>see</i> Local Civil Rule 6.3, the motions at Docket Nos. <u>190</u> , <u>194</u> , <u>196</u> , <u>197</u> , <u>198</u> , <u>200</u> are all denied. The Court will proceed to resolve the summary judgment motions following submission of those papers consistent with the briefing schedule (as amended by the Court). So Ordered by Judge Sanket J. Bulsara on 7/8/2025. (MPG) (Entered: 07/08/2025)
07/10/2025	<u>204</u>	Letter Motion Objection and Clarification to Order Dated July 8, 2025 (NF) (Entered: 07/10/2025)
07/11/2025		ORDER: The Court is in receipt of Plaintiff's letter motion objection to its prior order <u>204</u> . To be clear, the Court is not imposing any restriction on Plaintiff's ability to make any argument (or present any evidence) in support of her motion for summary judgment (or in opposition to Defendants' motion for summary judgment). The only restriction on summary judgment is on the length of the memoranda of law, which has word limits, by virtue of Local Civil Rule 7.1. And Plaintiff (and Defendants) may submit evidence, in the form of Rule 56.1 statements (and exhibits thereto), in connection with summary judgment. What Plaintiff (and Defendants) cannot do is relitigate or reargue decisions that have already been made—which is why the Court denied the motions to reconsider decisions which, in some instances, were made years ago. Such reconsideration is barred by Local Civil Rule 6.3, which requires reconsideration motions to be filed within 14 days of the initial decision (and reconsideration may only be sought once). To reconsider decisions already made, as previously noted, requires the Court to move backwards, and

		prevents the case from moving forward. To the extent that Plaintiff has new evidence, it should be presented in connection with the summary judgment briefing. The Court looks forward to reviewing and deciding the summary judgment papers so the case can either proceed to trial or be resolved at this stage. So Ordered by Judge Sanket J. Bulsara on 7/11/2025. (MPG) (Entered: 07/11/2025)
07/21/2025	<u>206</u>	NOTICE from Lidia Orrego RE: Petition for Writ of Mandamus, Motion for Permission to Appeal In Forma Pauperis, and Certificate of Service, submitted to the United States Court of Appeals for the Second Circuit on 7/16/2025. (Attachments: # <u>1</u> Part 2, # <u>2</u> Part 3, # <u>3</u> Part 4) (NF) (Entered: 07/23/2025)
07/23/2025	<u>205</u>	Letter MOTION to Vacate <i>Orders Dated July 8, 2025, For Recusal of District Judge Bulsara and Magistrate Judge Shields for Due Process Violations, For Leave to File a Second Amended Complaint, to Stay Proceedings, and to Vacate any Summary Judgment Scheduling Order</i> by Lidia M. Orrego. (NF) (Entered: 07/23/2025)
07/24/2025		ORDER: For the reasons stated in the Court's previous Orders, including on 7/8/2025 and 7/11/2025, the motion to vacate <u>205</u> is denied. So Ordered by Judge Sanket J. Bulsara on 7/24/2025. (MPG) (Entered: 07/24/2025)
08/05/2025	<u>207</u>	Emergency MOTION to Vacate <i>Objecting to Order Dated July 24, 2025, Denying DE <u>205</u>, for Due Process Violations Arising from Orders Dated July 8, 2025, and July 11, 2025, Reaffirmation of Recusal of District Judge Bulsara and M. Judge Shields, to Vacate Schedule for Summary Judgment Due to Defendants' Fraud Confirmed by NYS ATTORNEY GENERAL LETITIA JAMES, and Relief Requested in DE <u>205</u> - To Set the Record of Due Process Violations and Judicial Impropriety</i> by Lidia M. Orrego. (Attachments: # <u>1</u> Part 2) (NF) (Entered: 08/05/2025)
08/08/2025	<u>208</u>	Letter <i>regarding service of Defendants' motion for summary judgment on Plaintiff</i> by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Minnah-Donkoh, Kuuku) (Entered: 08/08/2025)
08/11/2025	<u>209</u>	NOTICE of Filing of Plaintiff's Motion for Summary Judgment filed by Lidia M. Orrego. (NF) (Entered: 08/11/2025)
08/14/2025	<u>210</u>	ORDER: The motion <u>207</u> is denied for the reasons stated in the attached, and Plaintiff is enjoined from making additional filings in this case, absent court order, and as set forth in the attached filing injunction. So Ordered by Judge Sanket J. Bulsara on 8/14/2025. (MPG) (Entered: 08/14/2025)
09/09/2025	<u>211</u>	MOTION for Leave to File Document <i>New Proceedings Based on New Evidence - Workers' Compensation Fraud by Shimmee Inc. and Others; Deprivation of Rights by Attorney General Letitia James and Governor Kathy Hochul</i> by Lidia M. Orrego. (NF) (Entered: 09/11/2025)
09/11/2025	<u>212</u>	NOTICE OF INTERLOCUTORY APPEAL as to <u>210</u> Order on Motion to Vacate, by Lidia M. Orrego. (KS) (Entered: 09/15/2025)
09/11/2025	<u>213</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Main Document 213 replaced on 9/22/2025) (LF). (Entered: 09/15/2025)
09/15/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>212</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 09/15/2025)
09/16/2025	<u>214</u>	ORDER: On September 11, 2025, Lidia Orrego, acting pro se, filed a Notice of Interlocutory Appeal <u>212</u> of this Court's August 14, 2025 Order <u>210</u> together with an application to proceed <i>in forma pauperis</i> ("IFP") <u>213</u> . However, Orrego used the form

		application for IFP status in the district court rather than Form 4 of the Appellate Appendix of Forms. Upon review, it is apparent that the present application lacks the information required by Federal Rule of Appellate Procedure 24(a)(1). Accordingly, the application to proceed IFP <u>213</u> is denied without prejudice and with leave to renew on the Circuit Court's Form 4 annexed to this Order. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (RB) (Entered: 09/16/2025)
09/16/2025		ORDER: Plaintiff Orrego has now filed multiple applications seeking leave to file additional motions and/or open new cases. Though the cover letters for these motions comply with the Court's admonition that leave be sought in a short letter with a word limit, the motions attach hundreds, if not thousands of pages of material, which not only violate the filing injunction, but are unnecessarily duplicative material. The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff. The motions seeking leave, in this case at Dkt. No. <u>211</u> , are denied. Plaintiff is prohibited from making any further filings on this docket, or using the portal available to pro se litigants, absent further order of this Court (no leave may be sought). The Clerk's Office is directed to terminate Plaintiff Orrego's access to the pro se portal, to reject and promptly return to Plaintiff any motion or document submitted by her, and not to file any submission on ECF or retain custody of such material. Plaintiff is reminded that her filing of this unnecessary material has simply impeded, delayed, and obstructed the Court's ability to resolve the merits of the case, and its ability to move this case forward, to trial (if appropriate). The Court will lift this filing injunction following resolution of the pending motions in all of her cases, in order to give her an opportunity to object, appeal, or reconsider any decision, or to make any post-decision filings attendant to trial, should the Court determine that the case should proceed to trial or further discovery. But until the Court renders such decisions, the filing injunction imposed by this order will remain in place. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (RB) (Entered: 09/16/2025)
09/18/2025	<u>215</u>	Letter from Pro Se Department to Lidia M. Orrego dated 9/18/2025. The enclosed documents are being returned without docketing or consideration for the following reason(s): Pursuant to the enclosed electronic orders So Ordered by District Judge Bulsara on 9/16/2025 "The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff." (NF) (Entered: 09/18/2025)
09/19/2025	<u>216</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 09/23/2025)
09/22/2025		Supplemental Electronic Index to Record on Appeal sent to US Court of Appeals. <u>212</u> Notice of Interlocutory Appeal. Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (LF) (Entered: 09/22/2025)
09/23/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>212</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 09/23/2025)
09/30/2025	<u>217</u>	Letter MOTION for Leave to Appeal <i>order of the court entered on September 16, 2025</i> by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
09/30/2025	<u>218</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (DC) (Entered: 10/02/2025)

09/30/2025	<u>219</u>	NOTICE OF INTERLOCUTORY APPEAL as to Order on Motion for Leave to File, entered on 9/16/2025, by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
10/01/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> <u>216</u> is denied. "An appeal may not be taken <i>in forma pauperis</i> if the trial court certifies in writing that it is not taken in good faith." <i>Romero v. DHL Express, Inc.</i>, No. 15-CV-4844, 2017 WL 2266990, at *1 (S.D.N.Y. May 6, 2017) (internal quotations and citations omitted). The "good faith" standard is objective; and it is not met when a party seeks review of a frivolous claim. <i>See Coppedge v. United States</i>, 369 U.S. 438, 444-45 (1962). Here, Orrego seeks to appeal this Court's entry of a filing injunction. As this Court has repeatedly explained, the filing injunction—imposed after notice was provided—was an appropriate sanction given Orrego's repetitive filing of unnecessary material that has impeded, delayed, and obstructed the Court's ability to resolve the merits of the case. (<i>See</i> Order dated Aug. 14, 2025). The Court is prepared to lift the injunction following resolution of the pending motions in all of Plaintiff's cases. (<i>See</i> Order dated Sep. 16, 2025). A frivolous appeal of the injunction only works to further delay the resolution of these cases. The Court has reviewed the record and certifies that an appeal would not be taken in good faith. <i>See Coppedge</i>, 369 U.S. at 444-45. The application to proceed <i>in forma pauperis</i> is denied. Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this Order. The Clerk of Court is also respectfully directed to mail a copy of this Order to Orrego at her address of record and to record such service on the docket. So Ordered by Judge Sanket J. Bulsara on 10/1/2025. (RB) (Entered: 10/01/2025)
10/01/2025	<u>220</u>	NEF received from Court of Appeals for the Second Circuit (USCA #25-2399) re Petition for Writ Served. (Attachments: # <u>1</u> Part 2) (LF) (Entered: 10/02/2025)
10/02/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>219</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (DC) (Entered: 10/02/2025)
10/03/2025	<u>221</u>	MOTION for Summary Judgment by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua. (Attachments: # <u>1</u> Rule 56.1 Statement, # <u>2</u> Declaration, # <u>3</u> Exhibit A - Plaintiff's Deposition, # <u>4</u> Exhibit B - Savitsky WCB Testimony, # <u>5</u> Exhibit C - Old Westbury Eddie, LLC, record of Incorporation, # <u>6</u> Exhibit D - Test Msgs, # <u>7</u> Exhibit E - Job Offer Letter, # <u>8</u> Exhibit F - Non-Disclosure Agreement, # <u>9</u> Exhibit G - Plaintiff's WC Application, # <u>10</u> Exhibit H - Plaintiff's Text Msgs, # <u>11</u> Exhibit I - Email Report 4, # <u>12</u> Exhibit J - Plaintiff's diary, # <u>13</u> Exhibit K - Plaintiff's Pavillion Agency Resume, # <u>14</u> Exhibit L - Plaintiff's March 5, 2021 WCB Hearing Testimony, # <u>15</u> Exhibit M - Text Msgs, # <u>16</u> Exhibit N - Plaintiff's October 26, 2018 Wage Statement, # <u>17</u> Exhibit O - November 2, 2018 Complaint, # <u>18</u> Exhibit P - Email Report 1, # <u>19</u> Exhibit Q - Email Report 2, # <u>20</u> Exhibit R - Email Report 3, # <u>21</u> Exhibit S - Email Report 5, # <u>22</u> Exhibit T - Email Report 6, # <u>23</u> Exhibit U - Email Report 7, # <u>24</u> Exhibit V - Email from Testa to Plaintiff re Investigation, # <u>25</u> Exhibit W - Email from Kevin Flannagan, # <u>26</u> Exhibit X - Termination Letter, # <u>27</u> Exhibit Y - Image of E-Folder Containing Photographs, # <u>28</u> Exhibit Z - Image of E-Folder Containing Videos, # <u>29</u> Exhibit AA - September 30, 2021 MTD Decision, # <u>30</u> Exhibit BB - March 10 2021 WCB Decision, # <u>31</u> Exhibit CC - June 21, 2021 WCB Board Panel Decision, # <u>32</u> Exhibit DD - November 2, 2023 Third Department Decision, # <u>33</u> Exhibit EE - Plaintiff's June 2021 Inspector General Complaint, # <u>34</u> Exhibit FF - Plaintiff's June 2021 NYSDOH Complaint, # <u>35</u> Exhibit GG - Plaintiff's July 2021 NYSCJC Complaint,

		# <u>36</u> Exhibit HH 0 Plaintiff's February 2023 State Court Complaint, # <u>37</u> Exhibit II - Transcript of February 2025 Proceeding, # <u>38</u> Exhibit JJ - April 2025 Decision, # <u>39</u> Exhibit KK - April 2025 Dismissal, # <u>40</u> Exhibit LL - Plaintiff's July 2024 State Court Complaint, # <u>41</u> Exhibit MM - June 2020 NCDSS Notice Ltrs, # <u>42</u> Exhibit NN - July 2020 NYS OCFS ltrs, # <u>43</u> Exhibit OO - Plaintiff's December 2020 Complaint against Debra Karpfntiff's March 2024 Ltr to NCDSS, # <u>44</u> Exhibit PP- Plaintiff's March 2024 Ltr to NCDSS, # <u>45</u> Exhibit QQ - Plaintiff's December 2024 Nassau County Article 78 Petition, # <u>46</u> Exhibit RR - April 2025 Nassau County Supreme Court Decision, # <u>47</u> Exhibit SS - Plaintiff's March 2021 Queens County Supreme Court Complaint, # <u>48</u> Exhibit TT - July 2025 Second Department Decision, # <u>49</u> Exhibit UU - March 2021 NYSDHR Determination and Order of Dismissal of Administrative Convenience, # <u>50</u> Exhibit VV - Plaintiff's August 2021 Queens County Supreme Court Complaint against Ley Family, # <u>51</u> Exhibit WW - Plaintiff's June 2020 Letter to the Derek Smith Law Group, # <u>52</u> Exhibit XX - Plaintiff's June 2020 Letter to Borrelli & Associates, # <u>53</u> Exhibit YY - Plaintiff's April 2020 Letter to Law Office of Peter A. Romero, # <u>54</u> Memorandum in Support, # <u>55</u> Exhibit Notice to Pro Se Litigation Who Opposed a Motion for Summary Judgment) (Minnah-Donkoh, Kuuku) (Entered: 10/03/2025)
10/03/2025	<u>222</u>	REPLY in Support re <u>221</u> MOTION for Summary Judgment filed by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua. (Minnah-Donkoh, Kuuku) (Entered: 10/03/2025)
10/03/2025	<u>223</u>	Letter MOTION for Leave to File Document <i>Motion for Summary Judgment</i> by Lidia M. Orrego. (NF) (Entered: 10/03/2025)
10/03/2025	<u>224</u>	AFFIRMATION of Lidia M. Orrego in Opposition re <u>221</u> Defendants' MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # <u>1</u> Affidavit in Support of Authentication of Evidence and Certifications Government Agencies, # <u>2</u> Plaintiff's Counterstatement of Material Facts Pursuant to Local Civil Rule 56.1 in Opposition to Defendants' Motion for Summary Judgment, # <u>3</u> Memorandum of Law in Opposition Defendants' Motion for Summary Judgment, # <u>4</u> Exhibit 1, # <u>5</u> Exhibit 2, # <u>6</u> Exhibit 3, # <u>7</u> Exhibit 4, # <u>8</u> Exhibit 5, # <u>9</u> Exhibit 6, # <u>10</u> Exhibit 7, # <u>11</u> Exhibit 8, # <u>12</u> Exhibit 9, # <u>13</u> Exhibit 10, # <u>14</u> Exhibit 11, # <u>15</u> Exhibit 12, # <u>16</u> Exhibit 13, # <u>17</u> Exhibit 14, # <u>18</u> Exhibit 15, # <u>19</u> Exhibit 16, # <u>20</u> Exhibit 17, # <u>21</u> Exhibit 18, # <u>22</u> Exhibit 19, # <u>23</u> Exhibit 20, # <u>24</u> Exhibit 21, # <u>25</u> Exhibit 22, # <u>26</u> Exhibit 24, # <u>27</u> Exhibit 25, # <u>28</u> Exhibit 26, # <u>29</u> Exhibit 27, # <u>30</u> Exhibit 28, # <u>31</u> Exhibit 29, # <u>32</u> Exhibit 30, # <u>33</u> Exhibit 31, # <u>34</u> Exhibit 32, # <u>35</u> Exhibit 33, # <u>36</u> Exhibit 34, # <u>37</u> Exhibit 35, # <u>38</u> Exhibit 36, # <u>39</u> Exhibit 37, # <u>40</u> Exhibit 38, # <u>41</u> Exhibit 39, # <u>42</u> Exhibit 40, # <u>43</u> Exhibit 41, # <u>44</u> Affirmation of Service) (NF) (Entered: 10/06/2025)
10/06/2025		ORDER: Pro se Plaintiff Orrego's request for leave to file her fully briefed motion for summary judgment <u>223</u> is denied as moot. Orrego's summary judgment motion is not subject to the Court's August 14, 2025 filing injunction <u>210</u> , and permission is not required to file. The Clerk is directed to docket the summary judgment briefing. So Ordered by Judge Sanket J. Bulsara on 10/6/2025. (RB) (Entered: 10/06/2025)
10/06/2025	<u>225</u>	Letter requesting the Clerk to (i) reclassify Plaintiff's filing (ECF No. 209) from a Notice to a Motion for Summary Judgment, or (ii) advise how the opposition should be filed under the current classification of same by Stephanieanna James-Knipfing, Kevin Knipfing, Old Westbury EDDIE LLC, Teresa A. Zantua (Minnah-Donkoh, Kuuku) (Entered: 10/06/2025)
10/06/2025	<u>226</u>	Notice of MOTION for Summary Judgment by Lidia M. Orrego. (Attachments: # <u>1</u> Notice of Motion for Summary Judgment, # <u>2</u> Affirmation of Lidia M.Orrego in Support of Local Rule 56.1 Statement and Motion for Summary Judgment, # <u>3</u> Plaintiff's Local Rule 56.1 Statement of Undisputed Material Facts, # <u>4</u> Memorandum of Law in Support

		of Plaintiff's Motion for Summary Judgment, # <u>5</u> List Exhibits Summary Judgment, # <u>6</u> Exhibit 1, # <u>7</u> Exhibit 2, # <u>8</u> Exhibit 3, # <u>9</u> Exhibit 4, # <u>10</u> Exhibit 5, # <u>11</u> Exhibit 6, # <u>12</u> Exhibit 7, # <u>13</u> Exhibit 8, # <u>14</u> Exhibit 9, # <u>15</u> Exhibit 10, # <u>16</u> Exhibit 11, # <u>17</u> Exhibit 12, # <u>18</u> Exhibit 13, # <u>19</u> Exhibit 14, # <u>20</u> Exhibit 15, # <u>21</u> Exhibit 16, # <u>22</u> Exhibit 17, # <u>23</u> Exhibit 18, # <u>24</u> Exhibit 19, # <u>25</u> Exhibit 20, # <u>26</u> Exhibit 21, # <u>27</u> Exhibit 22, # <u>28</u> Exhibit 23, # <u>29</u> Exhibit 24, # <u>30</u> Exhibit 25, # <u>31</u> Exhibit 26) (NF) (Entered: 10/07/2025)
10/06/2025	<u>227</u>	DECLARATION OF Kuuku Minnah-Donkoh in Opposition re Plaintiff's <u>226</u> Notice of MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # <u>1</u> Declaration of Kuuku Minnah-Donkoh in Opposition to Plaintiff's Motion for Summary Judgment, # <u>2</u> Defendant's Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment, # <u>3</u> Defendant's Responses to Plaintiff's Local Rule 56.1 Statement of Undisputed Material Facts, # <u>4</u> Exhibit ZZ) (NF) (Entered: 10/08/2025)
10/06/2025	<u>228</u>	REPLY in Support re <u>226</u> Notice of MOTION for Summary Judgment filed by Lidia M. Orrego. (Attachments: # <u>1</u> Plaintiff's Affirmation of Authentication of Exhibits 26-47, # <u>2</u> Plaintiff's Reply Defendants' Local Rule 56.1 Statement of Undisputed Material Facts Fated September 12, 2025, # <u>3</u> Plaintiff's Reply Memorandum of Law in Support of Motion for Summary Judgment, # <u>4</u> Exhibit 26, # <u>5</u> Exhibit 27, # <u>6</u> Exhibit 28, # <u>7</u> Exhibit 29, # <u>8</u> Exhibit 30, # <u>9</u> Exhibit 31, # <u>10</u> Exhibit 32, # <u>11</u> Exhibit 33, # <u>12</u> Exhibit 34, # <u>13</u> Exhibit 35, # <u>14</u> Exhibit 36, # <u>15</u> Exhibit 37, # <u>16</u> Exhibit 38, # <u>17</u> Exhibit 39, # <u>18</u> Exhibit 40, # <u>19</u> Exhibit 41, # <u>20</u> Exhibit 42, # <u>21</u> Exhibit 43, # <u>22</u> Exhibit 44, # <u>23</u> Exhibit 45, # <u>24</u> Exhibit 46, # <u>25</u> Exhibit 47) (NF) (Entered: 10/08/2025)
10/06/2025	<u>229</u>	NOTICE: The Clerks Office received the attached USB in support of <u>226</u> , <u>227</u> and <u>228</u> ; Original USB and has been sent to Judge Bulsara's chambers. (GO) (Entered: 10/08/2025)
10/06/2025		The Clerks Office is in receipt of the Pro Se Filings <u>226</u> , <u>227</u> and <u>228</u> . The cover letter states that the pro se litigant included the following: "4. Plaintiff's Opposition to Defendants' Motion for Summary Judgment (served September 12, 2025) Pages 1 - 1004"; AND "USB Flash Drive "EASTFUN" 32GB Blue Submission". After careful review of the documents, the clerks office was NOT provided with said documents. (GO) (Entered: 10/08/2025)
10/21/2025	<u>230</u>	MOTION for Leave to File Document <i>a Sur-Reply or Motion to Strike Based on Defendants' Non-Compliance with Local Rule 56.1(c), Warranting Admission of Plaintiff's Facts Under Rule 56.1(d), and to Strike 129-178 Pursuant to FRCP 12(f), FRCP 37, and FRE 403; and, for the record, Leave Noted Regarding the Court's Refusal of Plaintiff's Revised Opposition Under FRCP 15(a)(2) - "freely give[n] when justice so requires"</i> (DE <u>115</u>) attached Filed October 10, 2025, Returned October 20, 2025. by Lidia M. Orrego. (NF) (Entered: 10/21/2025)
10/21/2025	<u>231</u>	Letter in Response/Clarification to 10/6/2025 Docket Entry by Lidia M. Orrego (NF) (Entered: 10/22/2025)
10/22/2025		ORDER: The motion for leave <u>230</u> to file a sur-reply or motion to strike is denied. So Ordered by Judge Sanket J. Bulsara on 10/22/2025. (RB) (Entered: 10/22/2025)
11/05/2025		ORDER: In light of the impending reassignment of this case, the current motions, <u>203</u> , <u>217</u> , <u>218</u> , <u>221</u> , and <u>226</u> , are deemed withdrawn and should be refiled consistent with the individual practices of the new Judge(s) and only with permission of the newly assigned Judge(s). So Ordered by Judge Sanket J. Bulsara on 11/5/2025. (RB) (Entered: 11/05/2025)

11/17/2025		ORDER OF RECUSAL. Type of Recusal: party. Ordered by Judge Sanket J. Bulsara on 11/17/2025. Judge Sanket J. Bulsara, Magistrate Judge Anne Y. Shields recused. Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings. (BBM) (Entered: 11/17/2025)
11/18/2025	<u>232</u>	Letter MOTION for pre motion conference (<i>Urgent Request</i>) To Vacate Unlawful Pre-Filing Injunctions and to Restore Constitutional and Statutory Filing Rights/w-Exhibits filed by Lidia M. Orrego. (MLR) (Entered: 11/20/2025)
11/26/2025		Case Reassigned to Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields. Judge Pamela K. Chen, Magistrate Judge Taryn A. Merkl no longer assigned to the case. Please download and review the Individual Practices of the assigned Judges, located on our website . Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (BBM) (Entered: 11/26/2025)
11/26/2025		ORDER: The Court will be issuing orders deciding the previously filed motions. No refiling of motions is necessary. Nor is any party permitted to call Chambers to inquire about the status of previously filed motions. The Court will be issuing further decisions and orders in due course. The litigation bar previously entered, <u>210</u> , remains in place. Furthermore, no new motions, letters, or other requests may be filed by any party until further Court management orders are issued next week. So Ordered by Judge Sanket J. Bulsara on 11/26/2025. (RB) (Entered: 11/26/2025)
12/03/2025		ORDER: The Court issues the following case management order. The Court will decide all currently pending motions, including those recently reinstated, in due course. Neither party may make any additional filings on this docket until the Court decides the pending matters. So Ordered by Judge Sanket J. Bulsara on 12/3/2025. (RB) (Entered: 12/03/2025)
12/05/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> ("IFP") <u>218</u> is denied for the reasons set forth in the Court's October 1, 2025 Order in this case, and the Court's June 10, 2025 Order in a related case initiated by Orrego. (<i>See also Orrego v. Kerrigan</i> , No. 25-CV-0736 (E.D.N.Y. June 10, 2025), Dkt. No. 11 (denying IFP and listing all of Orrego's prior IFP applications, all of which have been denied)). Orrego again seeks IFP status to appeal the filing injunction in this case, which is substantially similar to the subject of the request the Court denied on October 1, 2025. The Court has reviewed the record and certifies that an appeal would not be taken in good faith and IFP status is denied for the purposes of such an appeal. <i>See Coppedge v. United States</i> , 369 U.S. 438, 444-45 (1962). Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this order. The Clerk of Court is also respectfully directed to mail a copy of this order to Orrego at her address of record and to record such service on the docket. Other motions remain pending, and the filing pause set by the Court's December 3, 2025 case management order remains in place. So Ordered by Judge Sanket J. Bulsara on 12/5/2025. (RB) (Entered: 12/05/2025)
12/10/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>212</u> Notice of Interlocutory Appeal, <u>219</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (GO) (Entered: 12/10/2025)
12/22/2025	<u>233</u>	Letter request (KS) (Entered: 12/23/2025)
12/22/2025	<u>234</u>	NOTICE OF INTERLOCUTORY APPEAL by Lidia M. Orrego. (KS) (Entered: 12/23/2025)

12/22/2025	<u>235</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 12/23/2025)
12/23/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>234</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 12/23/2025)
12/29/2025	<u>236</u>	USCA NOTICE re <u>235</u> MOTION for Leave to Appeal in forma pauperis. An appeal in the above-referenced case has been docketed in the Court of Appeals. According to the district court docket sheet or other available information, appellant has moved for leave to proceed in forma pauperis in the district court on December 22, 2025, and that motion is pending. The appeal may not move forward until the motion is determined. Please direct the motion to the appropriate judge for determination. Upon the grant or denial of the motion, please enter the order and transmit it to the Court of Appeals. 12/29/2025. USCA# 25-3217. (VJ) (Entered: 12/29/2025)
12/30/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> ("IFP") <u>235</u> is denied for the reasons set forth in the Court's December 5, 2025 Order. The Court has reviewed the record and certifies that an appeal would not be taken in good faith and IFP status is denied for the purposes of such an appeal. <i>See Coppedge v. United States</i> , 369 U.S. 438, 444-45 (1962). Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this order. The Clerk of Court is also respectfully directed to mail a copy of this order to Orrego at her address of record and to record such service on the docket. Other motions remain pending, and the filing pause set by the Courts December 3, 2025 case management order remains in place. So Ordered by Judge Sanket J. Bulsara on 12/30/2025. (RB) (Entered: 12/30/2025)
01/02/2026		Supplemental Electronic Index to Record on Appeal sent to US Court of Appeals. <u>234</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (LF) (Entered: 01/02/2026)
03/18/2026	<u>237</u>	MANDATE of USCA 25-1802 as to <u>234</u> Notice of Interlocutory Appeal filed by Lidia M. Orrego. Petitioner, pro se, has filed petitions for a writ of mandamus and moves for leave to proceed in forma pauperis in these consolidated petitions. Upon due consideration, it is hereby ORDERED that the motions for leave to proceed in forma pauperis are GRANTED for the purpose of filing the mandamus petitions. It is further ORDERED that the mandamus petitions are DENIED because Petitioner has not demonstrated that she lacks an adequate, alternative means of obtaining relief, that her right to the writ is clear and indisputable, and that granting the writ is appropriate under the circumstances. See <i>Cheney v. U.S. Dist. Ct. for D.C.</i> , 542 U.S. 367, 38081 (2004). (KS) (Entered: 03/18/2026)
03/24/2026		ORDER: Plaintiff Orrego's July 8, 2025 motion, <u>203</u> , is denied, for the reasons discussed in the Court's July 8, 2025 Order. So Ordered by Judge Sanket J. Bulsara on 3/24/2026. (RB) (Entered: 03/24/2026)

PACER Service Center
Transaction Receipt
03/30/2026 19:28:01

SR-4
DE [246] — NOTICE OF APPEAL
PURPORTED DE [244] AND DE [245]

ORREGO v. KNIPFING, et al.

United States District Court
Eastern District of New York

EDNY Case No. 2:20-cv-03361

Second Circuit Appeal No. 26-1576

DOCUMENT

DE [246] — Notice of Appeal Concerning Purported DE [244] and DE [245] and Selected Related Appellate Record

PURPOSE AND RELEVANCE

Provides selected official District Court and appellate records concerning the appeal from the post-recusal purported acts docketed as DE [244] and DE [245].

These materials facilitate direct review of Second Circuit Appeal No. 26-1576 and document the appellate proceeding through which the jurisdictional, recusal, due-process, Rule 56, and related challenges concerning purported DE [244] and DE [245] were presented.

SUPPLEMENTAL RECORD — SR-4
OFFICIAL COURT/APPELLATE RECORD — NOT A SEPARATE EXHIBIT

EXHIBIT 6

Total Pages 55.-

1

FILED
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

2026 JUN -1 PH 8: 22

-----X LIDIA M. ORREGO, Plaintiff, -against- KEVIN KNIPFING a/k/a KEVIN JAMES, STEPHANIEANNA JAMES-KNIPFING a/k/a STEFFIANA DE LA CRUZ, OLD WESTBURY EDDIE LLC, OLD WESTBURY, LLC, STEVE SAVITSKY, and TERESA A. ZANTUA, Defendants. -----X	U.S. DISTRICT COURT EASTERN DISTRICT OF NEW YORK Case No.: 2:20-cv-03361-SJB-AYS NOTICE OF APPEAL Eastern District of New York Related: Case No. 26-899 (2d Cir.) Filed: June 1, 2026
--	--

NOTICE OF APPEAL
28 U.S.C. §1291 | FRAP 3 & 4(a)(1)(A)
FILED WITHOUT ACCEPTANCE OF VOID POST-RECUSAL ACTS

1. Notice. Plaintiff Lidia M. Orrego, Pro Se, hereby appeals to the United States Court of Appeals for the Second Circuit from: (a) **DE [244]** — Memorandum and Order, May 8, 2026; (b) **DE [245]** — Judgment, May 8, 2026; and (c) all prior interlocutory orders merged into the final judgment. *Ginett v. Computer Task Group, Inc.*, 962 F.2d 1085, 1091 (2d Cir. 1992).

2. Preservation. This Notice does not constitute acceptance of DE [244] or DE [245]. Both are void *ab initio* under 28 U.S.C. §455 and *In re IBM Corp.*, 618 F.2d 923, 932 (2d Cir. 1980), entered 172 days after the November 17, 2025, Order of Recusal, while all jurisdiction vested in the Honorable Pamela K. Chen. No right, argument, or objection is waived.

3. Prior Proceedings — Merger. Interlocutory appeals 23-7941, 25-2225, 25-2434, and 25-3217 were dismissed for lack of jurisdiction as non-final orders. Mandamus petitions 25-1802 and 25-2399 were denied without explanation; Application In Forma Pauperis (“IFP”) was granted simultaneously in both by Mandate dated March 18, 2026, in the record. No prior proceeding was decided on the merits. Pursuant to the merger doctrine, all interlocutory orders, judicial entries, and purported acts issued between 2020 and 2026 by any and all presiding judges—including but not limited to U.S. District Judges Gary R. Brown, Joan M. Azrack, and recused Sanket J. Bulsara,

and recused Magistrate Judge Anne Y. Shields—merge into this final judgment for complete appellate review. *Ginett*, 962 F.2d at 1091. Plaintiff explicitly appeals the Motion to Dismiss Order at DE [30] (re-filed on the Summary Judgment record as DE [224-23]) ONLY IN PART, specifically targeting and seeking the plenary reversal of: (1) the dismissal of Plaintiff's race discrimination claims under 42 U.S.C. § 1981 and the NYSHRL against all Defendants, and (2) the dismissal of the retaliation and hostile work environment claims against Defendant Steve Savitsky, seeking full reinstatement of these active claims. Under no circumstances shall this explicit partial designation of DE [30] operate as a waiver, limitation, or exclusion of Plaintiff's right to seek plenary appellate review and absolute reversal of any and all other interlocutory entries, decisions, or post-recusal void purported acts issued throughout the entire history of this litigation.

4. Related Pending. Case No. 26-899 (Second Circuit) — purported denial of DE [203] — remains pending. Issues are subsumed in this appeal. FRAP 24(a)(5) IFP filed concurrently in 26-899.

SECTION I — RECUSAL, REASSIGNMENT, AND EVIDENCE REMOVAL

5. Order of Recusal — November 17, 2025 — Four Categories of Void Acts. The November 17, 2025, Order of Recusal is an active, valid, unreversed court order removing jurisdiction from Judge Bulsara and Magistrate Judge Shields and vesting full authority in the Honorable Pamela K. Chen and Magistrate Judge Merkl. It has never been vacated, appealed, or modified by any judicial act. All post-recusal acts are void *ab initio* under four independent categories: (a) **172-day post-recusal acts generally** — DE [244] and DE [245] entered May 8, 2026, 172 days after recusal; (b) **adjudication of withdrawn motions** — DE [221] and DE [226] were withdrawn by the November 5, 2025 pre-recusal order; no judicial act by Judge Chen reinstated them; DE [244] purported to adjudicate motions with no lawful procedural existence; (c) **clerk notation without judicial force** — the November 26, 2025 administrative clerk notation purporting to reassign the matter back to Judge Bulsara is not a judicial act and cannot vacate a recusal order under 28 U.S.C. §455; and (d) **post-recusal denial of the recusal motion itself** — DE [203] was purportedly denied on March 24, 2026 — 127 days into the post-recusal void period — by the same judge the motion sought to disqualify; a recused judge has no authority to adjudicate the motion that

disqualified him, and the denial contains an independent false statement by citing orders issued within three hours of the recusal motion on July 8, 2025 — without ever addressing the §455(a) question — as purported evidence the disqualification grounds lacked merit. **Dual-Ground Preservation:** Each FRCP 56 violation, DE [30] reversal, and evidentiary exclusion in Section II is preserved on two independent grounds: (i) void *ab initio* because a recused judge lacked authority to conduct any Summary Judgment analysis; and (ii) independent merits error requiring reversal even if DE [244] were treated as a valid order, because the stated Rule 56 standard and the applied Rule 56 standard are irreconcilable on the face of the order itself. *Liljeberg v. Health Services Acquisition Corp.*, 486 U.S. 847 (1988); 28 U.S.C. §455.

6. Evidence Removal — 26-mc-01957. On May 5, 2026, Plaintiff filed three court-authorized evidentiary submissions in 20-cv-3361. On May 8, 2026 — the same day DE [244] issued — MC 2:26-mc-01957-SJB was opened, those three filings were moved out of the 20-cv-3361 record, and the miscellaneous case was immediately closed. Plaintiff's Summary Judgment opposition evidence was thereby extracted from the record before DE [244] issued. DE [244] then stated no supplemental evidence was on the record. The miscellaneous case was created without Chief Judge authorization.

7. False Vexatious Litigant Label — Injunction Weaponized to Suppress Evidence. DE [244] at pp.25-27 falsely characterized Plaintiff as a vexatious litigant and imposed a permanent district-wide filing injunction without Chief Judge authorization (28 U.S.C. §137) and without independent *Safir* analysis. *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986). The actions cited as vexatious are statutory rights: mandamus petitions (28 U.S.C. §1651); interlocutory appeals (28 U.S.C. §1292); recusal motions (28 U.S.C. §455 — they succeeded on November 17, 2025; a motion producing an actual recusal is meritorious, not vexatious); judicial misconduct complaints (28 U.S.C. §351 — caused the recusal); and the U.S. Equal Employment Opportunity Commission ("EEOC") complaint (DE [224-26] Freedom of Information Act ("FOIA") 520-2019-01738), which is a mandatory exhaustion prerequisite whose Right to Sue Letter (Page ID #372) is the statutory jurisdictional foundation of this case — treating a jurisdictional prerequisite as evidence of vexatiousness is legal error on its face. The injunction's factual predicate (DE [221-1] ¶¶129-178) was the subject of an unresolved motion to strike (DE [230], denied without

adjudication one day after filing). The same order that applied the vexatious label removed Plaintiff's evidence through 26-mc-01957.

SECTION II — SUMMARY JUDGMENT VIOLATIONS PRESERVED FOR APPEAL

8. Plaintiff explicitly clarifies that the material judicial errors, factual distortions, and omissions enumerated herein represent only the primary, non-exhaustive examples of the pervasive bias and falsities contained within DE [244]. Plaintiff expressly reserves the right to raise, brief, and present any and all additional errors, false statements, and constitutional defects identified in the underlying record during the plenary briefing schedule before the Court of Appeals.

9. De Facto Ghostwriting, Verbatim Adoption, and Absolute Denial of Pro Se Special Solitude (DE [244]; DE [224-2])

The Court committed severe procedural and constitutional error by completely failing to conduct an independent judicial review of the Summary Judgment record, resulting in a total denial of mandatory "**special solicitude**" to the *pro se* Plaintiff. A forensic review of **DE [244]** against the Defendants' moving brief (**DE [221-54]**) establishes an extraordinary **83% to 88% verbatim overlap** section by section: legal standards (~92%); factual background (~88%); filing injunction (~90%); hostile work environment analysis (~82%); and retaliation (~80%). Specifically:

- **Abandonment of Judicial Function:** Every authority in **DE [244]** appears in Defendants' brief. The recused judge conducted zero independent analysis, drew no inferences in favor of the non-movant, and completely outsourced the creation of the judicial opinion to Defendants' private counsel.
- **Total Suppression of Pro Se Evidentiary Record:** This verbatim adoption caused the Court to completely disregard the Plaintiff's **178-paragraph Rule 56.1 Dispute Statement (DE [224-2])**, along with her open text messages (**DE [224-19]**) and medical proofs (**DE [224-4]**).
- **Violation of Binding Local Rules:** Under **Local Civil Rule 56.1(c)**, each paragraph Plaintiff specifically controverted with record citations must be deemed admitted as a matter of law, because Defendants (**DE [222]**) responded with only a single, ineffective

general objection to all 178 paragraphs. *Giannullo v. City of New York*, 322 F.3d 139, 142-43 (2d Cir. 2003).

- **Double Standard of Rules Enforcement:** The Court extended absolute leniency to the celebrity Defendants by ignoring their six years of corporate misrepresentations, while simultaneously denying the *pro se* Plaintiff a basic opportunity to cure a purported technical flash drive defect under FRCP 56(e)(1).
- **Reversible Error:** Under *Erickson v. Pardus*, 551 U.S. 89 (2007) and *Liteky v. United States*, 510 U.S. 540, 555 (1994), transforming a judicial order into a biased, copied instrument of moving counsel actively strips a *pro se* litigant of due process and demands absolute plenary reversal.

10. Fabrication of Procedural Defaults and Bad-Faith Suppression of Summary Judgment Evidence (DE [244]; DE [202]; DE [229]). The Court committed severe constitutional and due process violations by actively engineering a fraudulent procedural record to exclude Plaintiff's Summary Judgment evidence. Specifically:

- **The Evidentiary Bait-and-Switch:** The Court's July 11, 2025, Order explicitly directed Plaintiff to submit her new evidence with her Summary Judgment papers. Plaintiff timely filed a formal Notice of Request to Submit Electronic Evidence (DE [202]) to execute this directive.
- **The ECF Catch-22 Trap:** The recused judge ordered Plaintiff to request a secure file transmission link via chambers' email under Individual Practice § II.D, but simultaneously threatened to terminate her filing privileges if she emailed chambers. The Court intentionally suppressed Plaintiff's requests and never provided the link.
- **Seven-Month Retention and FRCP 56(e)(1) Breach:** Denied electronic access, Plaintiff filed a physical USB Flash Drive (DE [229]) on October 8, 2025. The Court retained this physical media in chambers for seven months without a word, only to claim on the day of final dismissal that it was unreadable. Under FRCP 56(e)(1) and the Court's own standing Order dated July 5, 2022, if summary judgment evidence cannot be opened, the judge is strictly forbidden from dismissing the case without providing formal notice and a reasonable opportunity to cure.

- **Fabricated Record in DE [244]:** The Court utilized its own deliberate refusal to provide an electronic link or a physical cure notice to falsely state in **DE [244]** that Plaintiff failed to follow court rules, masking a bad-faith administrative exclusion of conclusive data.

11. Complete Suppression of Clear Record Evidence Proving the NDA is Void and Non-Existent (DE [244]; DE [224-32]; DE [224-34]). The Court committed a severe, reversible error by completely ignoring timely-filed motions and conclusive evidence proving that the underlying Non-Disclosure Agreement (NDA) was nonexistent and legally void. Specifically:

- **The Non-Existent NDA Timeline: DE [244]** adopts the Defendants' fraudulent narrative that the Plaintiff was terminated for breaching an NDA. However, the record establishes that no operative NDA existed from January 31, 2018, to November 1, 2018, making a "breach" factually impossible.
- **The LOFT Legal Opinion (DE [224-32]):** The Court entirely suppressed the May 14, 2025, legal opinion from Loft Legal. This conclusive exhibit proves the NDAs are completely void under New York law due to lack of mutual assent, fraudulent backdating, and retaliatory termination.
- **Suppression of H. Judge Maurice D. Williams' Findings (DE [224-34]):** The recused judge completely ignored the landmark January 21, 2025, Judicial Finding issued by the Honorable Judge Maurice D. Williams in Workers' Compensation Board ("WCB") Case No. G-2584330.
- **Conclusive Rebuttal to Vexatiousness:** The official judicial findings of the Honorable Judge Maurice D. Williams, along with the evidence filed by the New York State Attorney General, directly confirm that Plaintiff's complaints and lawsuits are deeply rooted in fact. This thoroughly destroys the district court's false claim that Plaintiff's litigation is frivolous.
- **Direct Pretext Exposed:** By completely burying **DE [224-32]** and **DE [224-34]**, the District Court actively shielded the Defendants' reliance on a fabricated NDA violation to mask what was an entirely retaliatory termination, violating the mandatory Summary Judgment standard.

12. Factual Falsification of Department of Labor ("DOL") Record to Suppress Wage Claims (DE [244]; DE [224-29]; DE [228-23]). The Court committed severe reversible error by fabricating a false narrative regarding the Plaintiff's Department of Labor history to manufacture a fraudulent basis for a filing injunction. DE [244] falsely asserts that the Plaintiff's unpaid wage claims were dismissed as unmeritorious or frivolous. In direct contradiction, the physical Department of Labor Letter dated August 11, 2025 (Case No. LCM25006216), filed on the record at DE [224-29] and DE [228-23], explicitly states:

- "This decision is not based upon the merits of your claim."
- "We are not taking any specific position or opinion as to the validity of your claim at this time."
- "New York State Labor Law provides that an individual may also pursue a wage claim through private action."
- **Fabrication of Facts to Shield Employers:** By intentionally rewriting an administrative referral into an adverse merit ruling, the recused judge fabricated record facts to brand the *pro se* Plaintiff as vexatious and shield the celebrity employers from personal wage liability.
- **Absolute Rule 56 Violation:** Overlooking the explicit text of this agency document to construct a false narrative of absolute dismissal constitutes a severe breach of the Summary Judgment standard and a total denial of *pro se* due process.

13. Improper Injection of Unrelated Lawsuits to Manufacture a Prejudicial Filing Injunction (DE [244]; DE [8]). The Court committed severe reversible error by packing the summary judgment record with unrelated, non-pertinent lawsuits involving the Plaintiff. DE [244] improperly lists separate litigations that have zero legal connection to the active employment discrimination and retaliation claims set forth in the Amended Complaint (DE [8], re-filed as DE [224-4]). Specifically:

- **Prohibited Character Evidence:** The recused judge weaponized these outside dockets to manufacture a false narrative of "vexatiousness," using forbidden character inferences to dismiss the live case in open violation of FRCP 56.
- **Violation of the Safir Standard:** The Court failed to conduct an objective review under *Safir v. U.S. Lines, Inc.*, 792 F.2d 19 (2d Cir. 1986). The judge completely suppressed the

fact that these outside claims were legitimate, including cases containing verified judicial findings of merit issued by the **Honorable Judge Maurice D. Williams**.

- **Manifestation of Deep-Seated Bias:** Reaching outside the active record to pull in non-pertinent lawsuits to sanction a *pro se* litigant—while simultaneously refusing to open Plaintiff's **7.14 GB evidence drive (DE [229])**—conclusively demonstrates pervasive extrajudicial animosity under *Liteky v. United States*, 510 U.S. 540 (1994), rendering the resulting judgment void.

14. Unlawful Evidentiary Sabotage, Fabrication of NDA Breaches, and Violation of FRCP 56(e)(1) (DE [244]; DE [245]; DE [229]). The recused judge committed a fatal structural and constitutional error by issuing the purported Summary Judgment Order (DE [244]) and Final Judgment (DE [245]) without ever reviewing the active record evidence. Instead, the Court manufactured a false narrative of procedural default based on its own technical inability to open physical media, specifically:

- **The 7.14 GB Flash Drive Submission:** The clerk's office safely received and logged Plaintiff's physical USB Flash Drive (DE [229]) on October 8, 2025. The drive was physical proof containing exactly 7.14 gigabytes of material electronic data securely loaded for the record, and it was definitively not empty.
- **The Court's Reading Failure:** The Court held this physical media in chambers for seven months without a word, only to claim on the day of final dismissal that it was unreadable. The Court's staff simply failed to utilize standard, compatible software or file protocols to open a secured partition layout.
- **Absolute Violation of FRCP 56(e)(1):** Under well-settled federal law and the Court's own standing Order dated July 5, 2022, if summary judgment evidence cannot be opened, the judge is strictly forbidden from dismissing the case. The Court has a mandatory legal duty to issue a notice and provide a fair opportunity to cure. Disregarding a 7.14 GB evidence drive based on a clerical format failure without notice violates **FRCP 56(e)(1)**.
- **Fabrication of Fake NDA Breaches:** DE [244] falsely claims the Plaintiff secretly took unauthorized pictures or videos and breached a Non-Disclosure Agreement (NDA). In reality, the record establishes that **no operative NDA ever existed from January 31, 2018, to November 1, 2018.**

- **Failure to Explain Pretext:** The recused judge completely failed to explain how the Defendants' fraudulent termination letter could lawfully invoke an NDA that did not exist during that material timeframe. By granting summary judgment at DE [245] while suppressing the 7.14 GB flash drive and fabricating an NDA breach, the Court committed an absolute denial of *pro se* due process that requires plenary reversal.

15. Recycled Defendants' Motion To Dismiss "December 2020" Arguments — Selective Evidentiary Submission — "Rebeca Uzcategui's Interview" - November 2021 Suppressed. Defendants' December 2020 motion to dismiss (DE [22-3]) was filed on the pleadings only — no evidence — and DE [30] rejected every argument on that record. At Summary Judgment, Defendants submitted discovery materials: Plaintiff's deposition (unsigned, without the executed notarized errata sheet); Plaintiff's own November 12, 2018 interview with Defendants' investigators (DEFS_000017-19), which confirms Plaintiff's account of mental abuse and hostile conditions; emails and text messages to Kevin Knipfing aka Kevin James; the EEOC complaint; a Child Protective Services ("CPS") unfounded letter; and matters from other proceedings unrelated to the surviving 2018-2019 claims — which Plaintiff moved to strike (DE [230]) and which DE [244] used as the factual predicate for the permanent injunction and for character assassination. **The one document Defendants never filed is the only document that corroborates Plaintiff from an independent witness.** DEFS_000020-23 — the November 21, 2018, interview of Rebeca Uzcategui by Defendants' own commissioned investigators — confirms all discrimination, all Teresa A. Zantua's ("Zantua") abuse, child abuse, and that corrective measures 'REVERTED BACK.' Defendants produced DEFS_000020-23 in discovery. They did not file it at Summary Judgment because it contradicts their entire narrative. DE [244] was on notice of DEFS_000020-23 for three years and nine months — cited in DE [73] (February 2023) and DE [108] (April 2023) — and never mentioned it once in 29 pages. The submitted discovery materials, when read without selective omission, contain further corroboration: the English-only directives, the 'retarded' slurs, and the documented Zantua harassment are in the deposition record but were omitted from DE [244]'s analysis entirely. The EEOC complaint Kevin Knipfing never answered was treated as evidence of vexatiousness rather than as an unanswered administrative charge. The CPS unfounded letter was weaponized against Plaintiff despite Uzcategui's November 21, 2018, interview, independently confirming the child abuse Plaintiff reported. **Attorney arguments and**

assertions in briefs are not evidence. FRCP 56(c)(1)(A) requires citation to record materials. DE [244] adopted Defendants' litigation narrative — reproduced from their brief at 83-88% overlap — while ignoring the portions of Defendants' own submitted evidence that support Plaintiff and suppressing entirely the one document Defendants never filed. *Shrader v. CSX Transportation, Inc.*, 70 F.3d 255, 257 (2d Cir. 1995); *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986).

16. Selective Deposition Excerpts, Blank Errata Sheets, and Total Suppression of ECF Paper Transcripts (DE [244]; DE [224]). The Court committed severe reversible error by relying on distorted, selective deposition excerpts while the corrected, executed record was withheld. Specifically:

- **The Absolute Rule 56(e) Failure:** The Court received Plaintiff's physical flash drive submission (DE [229]) and retained it for approximately seven months without ever issuing a defect notice or providing a mandatory opportunity to cure. The complete absence of any notice over seven months, followed by an adverse summary judgment ruling, constitutes a standalone **FRCP 56(e)** failure and an independent due process violation.
- **Suppression of the Executed Errata Sheet:** Defendants submitted a blank, unsigned errata sheet and blank acknowledgment (DE [221-3]), intentionally suppressing Plaintiff's executed, notarized corrections. This includes the critical correction at page 163, Line 14, changing "hits you" to "hits me"—which entirely alters the identity of the person struck (p. 8). Basing a summary judgment dismissal on the uncorrected text constitutes a prohibited credibility determination compounded by blatant evidentiary suppression.
- **Total Disregard of Independent ECF Transcripts:** DE [244] footnote 7's characterization of the flash drive as "largely duplicative" cannot reach the six independent paper transcripts successfully filed directly onto ECF on October 3, 2025, as exhibits to DE [224] (specifically DE [224-13], DE [224-17], DE [224-18], DE [224-20], DE [224-21], and DE [224-22]) (pp. 8-9). These text records required zero flash drive access, yet the Court ignored them entirely or addressed them without engagement. This includes the text transcript documenting the October 23, 2018, physical assault made openly in Defendant Kevin Knipfing's direct presence with his knowledge and authorization, directly exposing the falsity of DE [244]'s "secretly-made" characterization.

- **One-Sentence Cross-Motion Dismissal:** Plaintiff's cross-motion (DE [226]) was summarily denied in a single sentence at page 1 with no independent legal standard applied and zero inferences drawn against the moving Defendants, in flagrant violation of fundamental summary judgment standards (p. 9). *Alta Partners, LLC v. Getty Images Holdings, Inc.*, 165 F.4th 141, 149 (2d Cir. 2026); *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986); *Graham v. Lewinski*, 848 F.2d 342, 344 (2d Cir. 1988).

17. Failure to Address Direct Evidence of Retaliatory Pretext (DE 224-19). The Court committed reversible error by completely failing to engage with critical text messages filed at DE [224-19], and the Amended Complaint (DE [8], re-filed on Summary Judgment as DE [224-4]). Specifically, the Court ignored:

- **The November 2, 2018, Text:** Stephanieanna Knipfing's text ("Send doctor report") was sent the exact day of the workplace complaint. This establishes immediate employer notice of the injury and proves an immediate effort to control the evidentiary record.
- **The Pre-Termination Text:** A text sent three days prior to the November 27, 2018, wrongful termination proves the firing was premeditated. This provides direct evidence of a retaliatory paper trail that DE [244] completely ignored.
- **Violation of the Law of the Case:** DE [30] (at pp. 15-16) previously credited these November 2 communications as establishing prior complaints and notice. DE [244] impermissibly reversed this finding without ever addressing DE [224-19] or citing DE [30].

18. Total Suppression of Lifelong Physical Injuries, Permanent Disease, and Damages (DE [224-4])

The Court committed severe reversible error by completely wiping out all record evidence regarding the Plaintiff's catastrophic physical and psychological injuries. DE [244] entirely suppressed the verified claims and medical exhibits set forth in the Amended Complaint (DE [8], re-filed on Summary Judgment as DE [224-4]), explicitly omitting:

- **The Permanent Disease Diagnosis:** Extensive evidence proves the racial discrimination, retaliation, and continuous physical aggression directly caused the Plaintiff to contract

Premature Ovarian Failure (POF) Disease—a permanent condition with no treatment for reversal.

- **Severe Psychiatric Disorders:** Medical reports dated June 14, 2019 (Exhibit 7, Page 63) and October 17, 2019 (Exhibit 8, Page 66) confirm diagnoses of **Major Depressive Disorder, Pain Disorder, and Post-Traumatic Stress Disorder (PTSD)**.
- **Exclusion of Workers' Comp Claims:** The Court ignored that the severe financial distress, physical injuries, and **Myofascial Pain Syndrome** (chronic pain disorder) were explicitly excluded from Workers' Compensation Board Case No. 0258 4330 (Exhibit 9, Page 79), making them fully compensable in this federal lawsuit.
- **Concealment of Tortious Conduct:** The Court completely buried the Defendants' intentional and reckless acts of **physical abuse, assault, battery, and defamation**, which were driven by racial harassment and victimization.
- **Total Destruction of Quality of Life:** The District Court completely ignored the concrete damages explicitly demanded in **DE [224-4]**, including:
 - Future financial loss and intense mental anguish.
 - Extreme personal and family pain and suffering.
 - The complete inability to care for her family.
 - Severe loss of enjoyment of life and complete loss of consortium.
- **Reversible Rule 56 Error:** By completely erasing these permanent physical and mental damages from the Summary Judgment record, the recused judge committed a fatal due process violation.

19. Omission of Direct Evidence of Premeditation and Religious Intimidation. The Court committed severe reversible error by completely omitting a highly material text message sent by Stephanieanna Knipfing DE [224-25] and Amended Complaint (**DE [8]**, re-filed on Summary Judgment as **DE [224-4]**) on **November 24, 2018**—exactly three days before the fraudulent termination letter dated **November 27, 2018**. The message contained an image of a priest with the text: *“Inasmuch as you pray with all your soul for the one who has slandered you, so much will God reveal the truth to them who have believed the slander.” — Saint Maximus the Confessor*

- **Proves Premeditation:** This communication proves the upcoming termination was not spontaneous or performance-based. It was a premeditated action directly related to the Plaintiff's workplace complaints.
- **Proves Retaliatory Pretext:** By completely erasing this text from the analysis, **DE [244]** shielded the Defendants from direct evidence of retaliatory animus, consciousness of guilt, and pretext, **in open violation of Rule 56.**

20. Complete Suppression of Medical Records and Discovery Orders (DE [224-25])

The Court committed reversible error by entirely ignoring the comprehensive medical records filed at **DE [224-25]**. Specifically, the Court suppressed:

- **The Medical Diagnosis:** Documented medical records since June 3, 2018, confirming diagnoses of severe physical injuries, Post-traumatic stress disorder ("PTSD"), and Major Depression directly caused by the hostile work environment, **causing irreversible damages to the Plaintiff.**
- **Violation of Discovery Orders:** These material records were never requested by the Defendants during formal discovery. This directly violates the Court's explicit standing Order dated July 5, 2022.
- **Evidentiary Distortions:** By completely disregarding **DE [224-25]**, **DE [244]** falsely claimed a lack of evidentiary support regarding damages and severe emotional distress, violating the mandatory Summary Judgment standard.

21. Material False Statements of Record in DE [244] — Including Fabricated Documentary Evidence. DE [244] contains at least fifteen material false statements directly contradicted by documentary evidence in the Summary Judgment record, including: (a) that no documents support Zantua ordered photographs — contradicted by three independent exhibits including Zantua's own October 19, 2018 text message and two third-party witnesses; (b) that recordings were secretly made in violation of the NDA — contradicted by employer authorization from February 17, 2018 forward, Zantua's written orders to record, open recording in Kevin Knipfing's direct presence without objection, employer's demand to review the same footage on the day of the complaint, and NDA not delivered until nine months into employment after all recordings were already made; (c) that the diary contains no mention of Zantua — contradicted by approximately seventy TAZ

references across thirty-seven dated diary entries in Defendants' own produced exhibit (DEFS_000054-068), including explicit racial slurs across multiple documented dates; (d) that all prior IFP applications have been denied — contradicted by SEVEN prior grants including Second Circuit Mandates 25-1802, 25-1808, 25-1810 and 25-2399 dated March 18, 2026, both in the district court record; and (e) a fabricated Offer Letter purportedly signed by Steve Savitsky ("Savistky") — an entity DE [30] dismissed in 2021 and never reinstated — which does not exist in any authenticated form in the record and which text message evidence in the record confirms is fabricated, compounding DE [245]'s facial defect of naming Savistky in the judgment and irreconcilable with Kevin Knipfing's three-signature filing at DE [17] binding Old Westbury LLC as an operative entity throughout this litigation. Full enumeration of all fifteen false statements, with verbatim DE [244] language, Page IDs, and record proof of falsity, is reserved for the appellate brief and Rule 60 motion.

22. Unlawful Grant of Summary Judgment to a Non-Existent Corporate Entity and Administrative Concealment of Fraud (DE [245]; 2:26-mc-01957-SJB). The Court committed fatal structural error in the Final Judgment (DE [245]) by granting Summary Judgment to a self-confessed, non-existent corporate entity in direct violation of FRCP 17(b). Furthermore, the Court engaged in active administrative concealment of this fraud by opening a separate docket, specifically:

- **Fraudulent Corporate Capacity:** The record establishes that Defendant Kevin Knipfing signed formal legal representations as an agent for an "Old Westbury LLC" entity that does not legally exist.
- **Six Years of Active Deception:** The Defendants knowingly perpetrated this fraudulent representation for over six years during active federal litigation, falsely asserting corporate protections and capacity they did not legally possess.
- **Concealment via Miscellaneous Case:** DE [244] explicitly designed and mandated the creation of Miscellaneous Case No. **2:26-mc-01957-SJB** for the illicit purpose of stripping the primary docket of the conclusive evidence proving this corporate fraud.
- **Total Lack of Jurisdiction:** By burying the Old Westbury LLC fraud evidence inside a closed miscellaneous file and entering judgment in favor of a non-existent corporate shell

at DE [245], the Court issued a ruling that is entirely void *ab initio* and constitutes a severe fraud upon the court.

- **Defendants' Decades-Long Affirmation and Judicial Estoppel (DE [22]; DE [22-3]; DE [22-5]; DE [22-8]; DE [33]; DE [65]):** The Defendants' own core procedural filings completely demolish their retroactive "typographical error" claim. The Plaintiff explicitly placed the Defendants on formal notice on November 20, 2020, inside her Memorandum of Law in Opposition to the Motion to Dismiss (DE [22-5], p. 1), identifying "Old Westbury, LLC" as an unknown, unregistered ghost entity (DE [22-5], pp. 1, 7). Despite this explicit warning, the Defendants deliberately chose to maintain, affirm, and litigate under that exact corporate capacity for over six years to secure a litigation advantage. Specifically, the formal Notice of Motion to Dismiss (DE [22]), the accompanying Memorandum of Law (DE [22-3]), and the Reply Memorandum of Law (DE [22-8]), filed on December 11, 2020, explicitly listed "Old Westbury, LLC" as a moving Defendant in both the case captions and text bodies, providing zero notice or reservation regarding a clerical typo or lack of capacity. This representation was reaffirmed under signature on October 14, 2021, inside the Answer to the Amended Complaint (DE [33]), where counsel formally defined, answered on behalf of, and defended "Old Westbury LLC ('OW')" as a standalone corporate defendant distinct from Old Westbury EDDIE LLC (DE [33] Answer Amended Complaint DE [8], p. 1, 19). Crucially, this dual corporate representation was actively locked onto the court record via **Plaintiff's Letter Motion Challenging Confidentiality (DE [65], pp. 1–2)**, filed on August 12, 2022, which incorporated the **Defendants' Responses to Initial Discovery Protocols** as a formal Exhibit 2. Throughout that entire phase, private defense counsel Gordon Rees Scully Mansukhani LLP ("GRSM") explicitly operated under the caption of "Old Westbury LLC" and failed to notice any depositions, file any objections, or raise any affirmative corrections regarding a corporate name defect. Under well-settled Second Circuit standards, the doctrine of **Judicial Estoppel** strictly prevents a party from asserting a formal legal capacity for six years to secure a litigation advantage, only to claim a clerical typo once their corporate fraud is unmasked. By granting Summary Judgment at DE [245] to an entity the record proves is a non-existent corporate ghost, the District Court committed a fatal error of law.

23. Fatal Error in Granting Summary Judgment to Savitsky and Explicit Partial Appeal of DE [30]. The Court committed severe structural and procedural errors regarding Defendant Steve Savitsky at DE [244] and DE [245]. Plaintiff explicitly utilizes this final appeal to challenge and reverse DE [30] only in part regarding Savitsky, based on the following:

- **Partial Appeal of DE [30]:** Plaintiff hereby appeals DE [30] only in part, specifically challenging the premature dismissal of the claims against Steve Savitsky. Conclusive evidence hidden in the record proves he actively participated in the workplace retaliation and committed extensive fraud.
- **Procedural Absurdity of DE [244]:** Because Savitsky was already dismissed by Judge Brown at DE [30], he was no longer an active party to the live claims. The recused judge committed a severe procedural error by granting Summary Judgment to an inactive defendant under DE [244].
- **Unlawful Protective Shield:** The District Court executed this improper Summary Judgment maneuver at DE [245] for the sole purpose of insulating Savitsky from appellate exposure and blocking the newly uncovered evidence of his personal liability.
- **Reversal and Reinstatement Sought:** The Second Circuit possesses full jurisdiction under the merger doctrine to vacate the Summary Judgment at DE [244], reverse the partial dismissal at DE [30], and reinstate Steve Savitsky as an active defendant in this action.

24. Reassignment Chronology and Physically Attached Exhibits. November 5, 2025: all motions withdrawn pre-recusal. November 17, 2025: recusal — jurisdiction to Judge Chen. November 26, 2025: clerk notation — no judicial vacatur of recusal. November. 26, 2025, through May 8, 2026: 172 days of void purported acts, including post-recusal denial of the recusal motion itself. May 5, 2026: Plaintiff files three authorized submissions. May 8, 2026: MC 2:26-mc-01957-SJB opened, evidence removed, case closed — same day as DE [244] and DE [245].

25. Physically attached: Exhibit 1 (DE [244]); Exhibit 2 (DE [245]); Exhibit 3 (November 17, 2025, Order of Recusal); Exhibit 4 (November 5, 2025, withdrawal order and November 26, 2025, clerk notation).

26. Additional exhibits by filing in the Record: The Second Circuit Mandates 25-1802, 25-1808, 25-1810, 25-2399 (March 18, 2026) — which granted IFP simultaneously and are already in the district court record — will be submitted with the IFP application filed concurrently with this Notice. The MC 2:26-mc-01957 docket and documents — referenced throughout this Notice.

27. IFP: The Second Circuit Mandates confirm IFP eligibility under the same financial circumstances presented here. Plaintiff additionally notes that IFP was granted by multiple courts in proceedings between 2024 and 2026 — the complete IFP history is set forth in the IFP application filed concurrently. **The purported IFP denials entered during the 172-day post-recusal void period were issued without jurisdiction and carry no legal effect.**

28. Reversible Error and Manifest Bias: Under well-settled federal appellate practice, a court cannot declare a litigant's filing history "frivolous" when multiple state supreme court justices, federal district judges, and panels of the Second Circuit have repeatedly reviewed those exact filings and issued formal mandates granting IFP status. By completely erasing these seven judicial orders from the record, the recused judge manufactured a fraudulent basis for a filing injunction, demonstrating profound extrajudicial animosity under *Liteky v. United States*, 510 U.S. 540, 555 (1994).

Respectfully submitted,



LIDIA M. ORREGO

Plaintiff Pro Se

Address: 95-08 Queens Blvd., Apt. 3E

Rego Park, New York 11374

Phone: (347) 453-2234

Email: orregoprose@gmail.com ; liorrego@gmail.com

Appeal to: United States Court of Appeals for the Second Circuit (Filed Simultaneously with IFP Application)

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
LIDIA M. ORREGO,

Plaintiff,

v.

KEVIN KNIPFING, et al.,

Defendants.

-----X
BULSARA, United States District Judge:

**MEMORANDUM
AND ORDER
20-CV-3361-SJB-AYS**

Before the Court are cross-motions for summary judgment on Plaintiff Lidia M. Orrego's claims against Defendants Kevin Knipfing, Stephanieanna Knipfing, Teresa Zantua, Old Westbury Eddie LLC, and Old Westbury LLC ("Defendants"). Orrego, who worked for the Knipfings as a nanny and housekeeper for several months in 2018, brings claims under the New York State Human Rights Law ("NYSHRL") and 42 U.S.C. § 1981 for hostile work environment and retaliation. Orrego alleges that Zantua – the aunt of the children she cared for – harassed her with repeated racist remarks, and after she complained to her employer, she was terminated. For the reasons explained below, Defendants' motion for summary judgment is granted, and Orrego's motion is denied. And for the reasons explained, including Orrego's vexatious and harassing litigation conduct, the Court imposes a permanent filing injunction on Orrego.

STANDARD FOR SUMMARY JUDGMENT

A "court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(a); *Celotex Corp. v. Catrett*, 477 U.S. 317, 322–23 (1986).

"A genuine issue of material fact exists if 'the evidence is such that a reasonable jury could return a verdict for the nonmoving party.'" *Nick's Garage, Inc. v. Progressive Cas. Ins. Co.*, 875 F.3d 107, 113 (2d Cir. 2017) (quoting *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986)). "In determining whether summary judgment is appropriate, [the Court] must resolve all ambiguities and draw all reasonable inferences against the moving party." *Tolbert v. Smith*, 790 F.3d 427, 434 (2d Cir. 2015) (citing *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587 (1986)).

The movant bears the burden of "demonstrat[ing] the absence of a genuine issue of material fact." *Celotex*, 477 U.S. at 323. "This is true even though the court [is] presented with cross-motions for summary judgment; each movant has the burden of presenting evidence to support its motion that would allow the district court, if appropriate, to direct a verdict in its favor." *Barhold v. Rodriguez*, 863 F.2d 233, 236 (2d Cir. 1988). "When both parties have moved for summary judgment, the court must evaluate each party's motion on its own merits, taking care in each instance to draw all reasonable inferences against the party whose motion is under consideration." *Alta Partners, LLC v. Getty Images Holdings, Inc.*, 165 F.4th 141, 149 (2d Cir. 2026) (quotation omitted).

"A party asserting that a fact cannot be or is genuinely disputed must support the assertion" in one of two ways. Fed. R. Civ. P. 56(c)(1). It may cite to portions of the record "including depositions, documents, electronically stored information, affidavits or declarations, . . . admissions, interrogatory answers, or other materials." *Id.* R. 56(c)(1)(A). Alternatively, it may show that "the materials cited do not establish the

absence or presence of a genuine dispute, or that an adverse party cannot produce admissible evidence to support the fact.” *Id.* R. 56(c)(1)(B); *cf. Farid v. Smith*, 850 F.2d 917, 924 (2d Cir. 1988).

In moving for summary judgment or answering such a motion, litigants are required by the Local Rules to provide a statement (a Rule 56.1 statement) setting forth purported undisputed facts or, if controverting any fact, responding to each assertion. *See* Loc. Civ. R. 56.1(a)–(b). In both instances, the party must support its position by citing to admissible evidence from the record. *Id.* R. 56.1(d); *see also* Fed. R. Civ. P. 56(c) (requiring reliance on admissible evidence in the record in supporting or controverting a purported material fact). “The purpose of Local Rule 56.1 is to streamline the consideration of summary judgment motions by freeing district courts from the need to hunt through voluminous records without guidance from the parties.” *Holtz v. Rockefeller & Co.*, 258 F.3d 62, 74 (2d Cir. 2001).

Where claims in opposing Rule 56.1 statements are “genuinely disputed,” the Court will consider the evidentiary sources of the claims. *Halberg v. United Behav. Health*, 408 F. Supp. 3d 118, 146 (E.D.N.Y. 2019) (adopting report and recommendation). In evaluating the sources of claims made in dueling Rule 56.1 statements, the Court cannot—as is true for the summary judgment motion as a whole—weigh evidence or assess the credibility of witnesses. *See United States v. Rem*, 38 F.3d 634, 644 (2d Cir. 1994). Furthermore, “[l]egal arguments are impermissible in any Rule 56.1 Statement and are to be disregarded.” *Taveras v. HRV Mgmt., Inc.*, No. 17-CV-5211, 2020 WL 1501777, at *2 (E.D.N.Y. Mar. 24, 2020); *Lawrence v. Cont’l Cas. Co.*, No. 12-CV-412, 2013

WL 4458755, at *1 n.1 (E.D.N.Y. Aug. 16, 2013) (“Both parties have submitted Local Rule 56.1 statements and responses to each other’s statements that mix factual assertions with legal argument and therefore fail to meet the requirements of Local Rule 56.1. The facts . . . are taken from those assertions contained in the Local Rule 56.1 statements that comply with Local Rule 56.1[.]” (citations omitted)). The court may not grant summary judgment based on a fact in a Rule 56.1 statement – even if undisputed – not supported by admissible evidence. *E.g., Giannullo v. City of New York*, 322 F.3d 139, 142–43 (2d Cir. 2003) (vacating grant of summary judgment to defendants based on facts enumerated in Rule 56.1 statement supported only by arguments in briefs rather than admissible evidence). The Court must also disregard conclusory denials that lack citations to admissible evidence. *Rodriguez v. Schneider*, No. 95-CV-4083, 1999 WL 459813, at *1 n.3 (S.D.N.Y. June 29, 1999) (“Rule 56.1 statements are not argument. They should contain factual assertions, with citation to the record. They should not contain conclusions[.]”), *aff’d*, 56 F. App’x 27, 29 (2d Cir. 2003). Also, where the opposing party fails to specifically controvert a numbered paragraph in the Rule 56.1 statement, the statement by the moving party “will be deemed to be admitted.” Loc. Civ. R. 56.1(c). The Court also does not give any consideration to hearsay, speculation, or inadmissible evidence in evaluating declarations or affidavits. *Pacenza v. IBM Corp.*, 363 F. App’x 128, 130 (2d Cir. 2010) (“[A] court is obliged not to consider inadmissible evidence at the summary judgment stage[.]”); *Crawford v. Dep’t of Investigation*, No. 05-CV-5368, 2007 WL 2850512, at *2 (S.D.N.Y. Oct. 1, 2007) (“[A] non-moving party ‘must set forth specific facts showing that there is a genuine issue for trial;’ he or she ‘may not rely on mere

conclusory allegations nor speculation, but instead must offer some hard evidence showing that its version of the events is not wholly fanciful.” (quoting *Woodman v. WWOR-TV, Inc.*, 411 F.3d 69, 75 (2d Cir. 2005))), *aff’d*, 324 F. App’x 139, 143 (2d Cir. 2009).

FACTUAL BACKGROUND

The Court finds the following facts – drawn from the pleadings, the parties’ respective Rule 56.1 statements, and supporting affidavits and exhibits attached thereto – are undisputed unless otherwise noted.

The Knipfings, Kevin (“Mr. Knipfing”) and Stephanieanna (“Ms. Knipfing”), have four children, and hired Orrego to work as a nanny in February 2018. (Defs.’ Rule 56.1 Statement (“Defs.’ 56.1 Stmt.”), Dkt. No. 221-1 ¶¶ I(3), 11; Pl.’s Rule 56.1 Resp. (“Pl.’s 56.1 Resp.”), Dkt. No. 224-2 ¶¶ I(3), 11).¹ At that time, the Knipfings had a staff of five that they employed through their company, Old Westbury Eddie, LLC.² (*Id.* ¶¶ I(7), 1; Defs.’ 56.1 Stmt. ¶¶ I(7), 1). The staff included: Skylar Testa, the house

¹ The numbering of Defendants’ 56.1 Statement restarts at Section II. Accordingly, the Court notes paragraphs from Section I as, for example, ¶ I(3). All references to numbered paragraphs without a section label directly preceding that number correspond to the continuous numbering that begins at Section II.

² Orrego named both Old Westbury Eddie, LLC, and Old Westbury, LLC, as defendants seemingly because the termination letter she was issued came from “Old Westbury, LLC,” but she acknowledges there is no such company registered in New York. (*See* Pl.’s Rule 56.1 Statement (“Pl.’s 56.1 Stmt.”), Dkt. No. 226-3 ¶ 17). Defendants respond that their company, which was “incorporated in New York to serve as the employer of record for the Knipfings’ domestic employees,” is “Old Westbury Eddie, LLC,” and omitting “Eddie” from the termination letter was a typographical error. (Defs.’ Rule 56.1 Resp. (“Defs.’ 56.1 Resp.”), Dkt. No. 227-3 ¶ 17). The Court refers to the entity generally as “Old Westbury,” and all parties have briefed the motion understanding there is only a single entity defendant.

manager, Rebecca Uzcategui, the primary nanny, Cristina Coimbra, the housekeeper, Gerardo Guarino, the chef, and Shannon Sha, who homeschooled the Knipfings' children. (*Id.* ¶¶ 1–6; Pl.'s 56.1 Resp. ¶¶ 1–6).

Before beginning her employment, Orrego signed a non-disclosure agreement (“NDA”). (Defs.' 56.1 Stmt. ¶¶ 13–18).³ The NDA generally prohibits employees from discussing confidential information – which the NDA broadly defines to include, among other things, personal information about the Knipfings and their employees – with any third party absent Mr. Knipfing's express written permission, subject to several exceptions, such as to report possible violations of federal or state law. (*Id.* ¶¶ 15–17). Under the NDA, photographs pertaining to the Knipfings were also deemed confidential information, and a separate provision forbade taking photos or videos of the Knipfings without express permission. (*Id.* ¶¶ 15, 18).

³ Orrego says she denies these statements in her 56.1 Response, but the bases she offers do not appear to contest the heart of the statements. For example, Orrego denies that she ever received any documents to sign prior to her employment, on the ground that her text messages with Testa about the hiring process, that she supplied to the Court, do not show that she received any documents to sign. (Pl.'s 56.1 Resp. ¶ 13). She adds a comment, describing that text message exhibit: “NDA Never Received.” (*Id.*). The crux of her contestation, more clearly in her explanations for her denials of the descriptions of the NDA, seems to be that she was never given a complete copy of the NDA before or after signing. (*Id.* ¶¶ 14–18 (noting “NDA require to have copy” and “I never get a copy of the NDA”)). But Defendants provided a complete copy of an NDA with Orrego's signature. (*See* NDA, attached to Defs.' Mot. as Ex. F, Dkt. No. 221-8). And even if the Court were to not consider the NDA, there are other legitimate, non-retaliatory reasons for her termination, which entitle Defendants to summary judgment. *See infra* pp. 20–22.

At some point, Orrego also assumed some housekeeping duties for the Knipfings—the date is disputed, but is not material.⁴ On October 31, 2018, Ms. Knipfing and Testa informed Orrego that she would no longer be a nanny and housekeeper—she would only serve as a nanny. (*Id.* ¶ 75; Pl.’s 56.1 Resp. ¶ 75). Two days later, on November 2, 2018, Orrego sent Ms. Knipfing and Testa an email raising allegations that Uzcategui, the primary nanny, had been harassing Orrego and mistreating the children, and that Zanuta, Ms. Knipfing’s sister, had been harassing Orrego with racially discriminatory comments. (*Id.* ¶¶ I(4), 78–81; Defs.’ 56.1 Stmt. ¶¶ I(4), 78–81). Testa forwarded the email to Mr. Knipfing the same day, and on November 6, 2018, Mr. Knipfing met with Orrego to discuss her complaints and asked her to send him any evidence she had, which she did over the next week. (*Id.* ¶¶ 88–92; Pl.’s 56.1 Resp. ¶¶ 88–92). Testa informed Orrego on November 11, 2018, that the Knipfings had hired investigators to look into the allegations she raised, and those investigators met with and interviewed Orrego the following day. (*Id.* ¶ 99; Defs.’ 56.1 Stmt. ¶¶ 98–99).⁵

After the investigation concluded, Orrego was informed on November 27, 2018 that her employment was terminated. (*Id.* ¶ 103; Pl.’s 56.1 Resp. ¶ 103). The

⁴ Orrego contends at one point that she was hired as a nanny *and* housekeeper, and at another that she began housekeeping duties in March 2018. (Pl.’s 56.1 Resp. ¶¶ 68, 70). Defendants assert that Orrego asked to also serve as a housekeeper around July 2018, when the Knipfings were looking for a second housekeeper. (Defs.’ 56.1 Stmt. ¶¶ 70–72).

⁵ Though it is not detailed in the parties’ 56.1 Statements, the Court notes that it appears from an audio transcription submitted by Orrego that when she met with Mr. Knipfing on November 6, 2018, she was told that she would not be working, but would be paid, until the investigation resolved. (Audio Transcription, attached to Pl.’s Opp’n as Ex. 17, Dkt. No. 224-20 at 7).

termination letter gave multiple reasons, including: 1) breach of the NDA; 2) a statement Orrego made in the course of the investigation that she was unwilling to continue working with Uzcategui; and 3) the conclusion that Orrego made false statements in her initial complaint. (*Id.* ¶ 104; Defs.' 56.1 Stmt. ¶ 104; Termination Letter, attached to Defs.' Mot. as Ex. X, Dkt. No. 221-26).

Orrego then initiated this lawsuit on July 23, 2020, (Compl., Dkt. No. 1), and filed the Amended Complaint on August 17, 2020, (Am. Compl., Dkt. No. 8). The Amended Complaint named as Defendants the Knipfings, Old Westbury Eddie LLC, Old Westbury LLC, Steve Savitsky, and Zantua. (*Id.* at 2-3, 9-10). She brought claims for race discrimination, hostile work environment, and retaliation under 42 U.S.C. § 1981, the NYSHRL, New York City Human Rights Law ("NYCHRL"), and New York Labor Law ("NYLL"). (*Id.* at 4, 11). She also asserted claims under state criminal laws for forgery and perjury. (*Id.* at 4).

The Court dismissed Orrego's claims asserted under the NYCHRL, NYLL, and state criminal laws, and dismissed her discrimination claims brought under § 1981 and the NYSHRL. (Mem. & Order dated Sep. 30, 2021, Dkt. No. 30 at 1). The Court also dismissed the retaliation claim against Zantua, and all claims against Savitsky. (*Id.*). The parties agree that the remaining claims are: 1) Orrego's § 1981 and NYSHRL hostile work environment claims based on race and national origin against the Knipfings, Zantua, and Old Westbury; and 2) Orrego's § 1981 and NYSHRL retaliation claims

against the Knipfings and Old Westbury. (Defs.' 56.1 Stmt. ¶ 117; Pl.'s 56.1 Resp. ¶ 117).⁶

Defendants' fully briefed motion for summary judgment was filed on the Court's docket on October 3, 2025. (*See* Defs.' Mem. in Supp. of Mot. for Summ. J. dated Aug. 8, 2025 ("Defs.' Mot."), Dkt. No. 221-54; Pl.'s Mem. in Opp'n to Defs.' Mot. dated Aug. 12, 2025 ("Pl.'s Opp'n"), Dkt. No. 224-3; Defs.' Mem. in Reply dated Oct. 3, 2025 ("Defs.' Reply"), Dkt. No. 222). Orrego's fully briefed motion was filed that same day.⁷ (*See* Pl.'s Mem. in Supp. of Mot. for Summ. J. dated Aug. 8, 2025 ("Pl.'s Mot."), Dkt. No. 226-4; Defs.' Mem. in Opp'n to Pl.'s Mot. dated Sep. 12, 2025 ("Defs.' Opp'n"), Dkt. No. 227-2; Pl.'s Mem. in Reply dated Oct. 3, 2025 ("Pl.'s Reply"), Dkt. No. 228-3).

⁶ This case was first reassigned from the Honorable Gary R. Brown to the Honorable Joan M. Azrack on May 18, 2023, and then to the undersigned on January 31, 2025.

⁷ Orrego submitted USB flash drives with her motion papers. (*See* Notice dated Oct. 6, 2025, Dkt. No. 229). However, the Court cannot access or review the contents of flash drives. And Orrego was expressly informed of the Court's protocol for submission of large electronic files in the event they cannot be filed on ECF. (Order dated July 8, 2025 ("The Court has received from Plaintiff multiple requests to submit electronic evidence. The protocol for submission of large electronic files set forth in the Court's Individual Practices § II.D, however, is only to be utilized for trial or motion practice where exhibits are appropriate for the Court's consideration of the issues involved, such as summary judgment. Both sides are therefore informed that, outside of such limited practice, documents should be filed only on ECF.")). According to a letter Orrego submitted, it appears the flash drives contain: the pictures and videos Orrego took while employed by the Knipfings, social media accounts of other employees and Mr. Knipfing, the reports Orrego sent to Mr. Knipfing, and a worker's compensation recording. (Pl.'s Letter dated Oct. 3, 2025, Dkt. No. 226 at 3-4). From the descriptions, this evidence appears largely duplicative of material submitted on the Court's docket, though the Court is unable to review it.

DISCUSSION

I. Hostile Work Environment

“Section 1981 and NYSHRL⁸ hostile work environment claims are governed by the same substantive standard.” *Alvarado v. Nordstrom, Inc.*, 685 F. App’x 4, 6 (2d Cir. 2017). “To establish a prima facie case of hostile work environment, the plaintiff must show that the discriminatory harassment was sufficiently severe or pervasive to alter the conditions of the victim’s employment and create an abusive working environment, and that a specific basis exists for imputing the objectionable conduct to the employer.” *Id.* (quotation omitted). While § 1981 permits a plaintiff to sue individuals in addition to employers, *id.*, the NYSHRL generally does not permit individual liability for employment discrimination, *see Nezaj v. PS450 Bar & Rest.*, 719 F. Supp. 3d 318, 329 (S.D.N.Y. 2024) (“[A]s the divided New York Court of Appeals clarified . . . , where a corporate entity is the plaintiff’s employer, an individual affiliated with the entity cannot himself qualify as the employer . . . even if the individual holds a high post at the employer or owns the entity.” (citing *Doe v. Bloomberg, L.P.*, 36 N.Y.3d 450, 457–58 (2021))) (collecting cases).

⁸ Because the complained-of conduct occurred prior to October 11, 2019 – when amendments to the NYSHRL made certain standards more lenient – Orrego’s NYSHRL hostile work environment claim is analyzed under the Title VII standard. *Wheeler v. Praxair Surface Techs., Inc.*, 694 F. Supp. 3d 432, 452 (S.D.N.Y. 2023) (“[F]or a plaintiff whose claim is based on conduct before October 11, 2019, the Title VII standard still applies.”); *Lee v. Riverbay Corp.*, 751 F. Supp. 3d 259, 274 (S.D.N.Y. 2024) (explaining that before the amendment, “the pleading standards were generally the same for Title VII, section 1981, and NYSHRL claims” (quotation omitted)). Orrego does not suggest otherwise.

A. Claim Against Zantua

"[I]ndividuals may be held liable under § 1981." *Whidbee v. Garzarelli Food Specialties, Inc.*, 223 F.3d 62, 75 (2d Cir. 2000). But in those instances "the individuals have been supervisors who were personally involved in the discriminatory activity." *Id.* (quotation omitted).

A supervisor "is empowered by the employer 'to take tangible employment actions against the victim, *i.e.*, to effect a significant change in employment status, such as hiring, firing, failing to promote, reassignment with significantly different responsibilities, or a decision causing a significant change in benefits.'" *Wiercinski v. Mangia 57, Inc.*, 787 F.3d 106, 113–14 (2d Cir. 2015) (quoting *Vance v. Ball State Univ.*, 570 U.S. 421, 431 (2013)) (applying *Vance*'s "supervisor" definition under Title VII to a § 1981 claim). "In other words, a supervisor is an individual empowered by the company as a distinct class of agent to make economic decisions affecting other employees under his or her control." *Id.* at 114 (quotation omitted); *e.g.*, *Bentley v. AutoZoners, LLC*, 935 F.3d 76, 91 (2d Cir. 2019) (explaining that "to raise a triable issue of fact" as to whether a defendant was a supervisor, plaintiff "had to adduce admissible evidence" showing that her employer had authorized defendant "to do more than oversee her day-to-day performance of assigned tasks" – that is, "to take *tangible employment actions* that could *inflict direct economic injury*").

Defendants contend that Zantua was not Orrego's supervisor, and in fact, was never employed by the Knipfings. (Defs.' Mot. at 7). And they point to several pieces of evidence, including Orrego's own admissions, to demonstrate as much. Defendants

point to Orrego's deposition testimony that she never submitted her timesheets to Zantua, that she did not know whether Zantua had any authority to suspend, demote, or terminate her employment, or change her salary, and that she did not know whether the Knipfings ever paid Zantua to perform any work. (Defs.' 56.1 Stmt. ¶¶ 19–22; *see also* Dep. of Lidia Orrego ("Orrego Dep."), attached to Defs.' Mot. as Ex. A, Dkt. No. 221-3 at 141:20–25, 152:5–154:2). Defendants also point to Orrego's Worker's Compensation claim filed in September 2019, in which she identifies Testa—not Zantua—as her supervisor. (Defs.' 56.1 Stmt. ¶ 23). Orrego does not meaningfully contest much of this evidence; the evidence she does contest is unsupported by the record portions she cites. Orrego states that Zantua "is the second shift nanny to help with 4 kids," but she cites and provides no evidence in support of that assertion. (Pl.'s 56.1 Resp. ¶ 22). And as for naming Testa as her supervisor in her Worker's Compensation material, she responds that supervisor and house manager mean the same thing to her, but provides no record evidence in support. (*Id.* ¶ 23). Orrego argues that Zantua had a supervisory role because she "direct[ed] Plaintiff's tasks," but again points to no evidence that could support that contention.⁹ (Pl.'s Opp'n at 9).

Thus, given the undisputed evidence identified by Defendants, the Court concludes that Zantua cannot be considered a supervisor for purposes of Orrego's

⁹ In light of Orrego's pro se status, the Court has considered the factual assertions and arguments regarding Zantua's supervision that Orrego makes in support of her own summary judgment motion, which are slightly more detailed than those opposing Defendants' motion. For example, Orrego there claims that Zantua "order[ed] Plaintiff to take photographs and videos of the Knipfings' children." (Pl.'s 56.1 Stmt. ¶¶ 2, 4). But no documents cited actually support the assertion, and in any event, directing tasks like taking photos does not demonstrate Zantua's supervisory liability or role.

hostile work environment claim, and accordingly, the claim against Zantua is dismissed. *E.g., Bentley*, 935 F.3d at 91–92 (finding no supervisory authority where the defendant could not hire, fire, promote, demote, or set compensation or work hours); *Lekettey v. City of New York*, 637 F. App'x 659, 662 (2d Cir. 2016) (finding that the plaintiff presented no facts from which the court could find that defendant was “empowered by the employer to take tangible employment actions against” the plaintiff).

B. Claims Against the Knipfings and Old Westbury

Under federal law governing hostile work environment claims, the same standard for imputing harassment by non-supervisory co-workers to employers applies to imputing harassment by non-employees, with the qualification that the court “will consider the extent of the employer’s control and any other legal responsibility which the employer may have with respect to the conduct of such non-employees.” *Summa v. Hofstra Univ.*, 708 F.3d 115, 124 (2d Cir. 2013) (quotation omitted) (applying the test for imputing harassment by co-workers where plaintiff, team manager of the football team, sued the university for the hostile work environment created by football players). That is, “the employer will be held liable only for its own negligence, and the plaintiff must demonstrate that the employer failed to provide a reasonable avenue for complaint or that it knew, or in the exercise of reasonable care should have known, about the harassment yet failed to take appropriate remedial action.” *Id.* (quotation omitted). “In determining the appropriateness of an employer’s response,” courts “look to whether the response was immediate or timely and appropriate in light of the circumstances,

particularly the level of control and legal responsibility [the employer] has with respect to [the employee's] behavior." *Id.* (quotation omitted).

Although Zantua was not Orrego's supervisor, she was a family member of Orrego's employer—and Orrego worked in the home of her employer, taking care of their children and assisting around the house. Thus, like in *Summa*, the Court applies the test for imputing harassment by co-workers—even if Zantua is not an employee at all—given the degree of control that the Knipfings presumably had over Zantua's conduct in their own home, with their own children. *See id.* But even under this approach, the Knipfings and Old Westbury may only be held liable for non-supervisor misconduct if they "provided no reasonable avenue for complaint or knew of the harassment but did nothing about it." *Whidbee*, 223 F.3d at 72 (quotation omitted).

Orrego had multiple avenues to raise a complaint—by texting or emailing the Knipfings or Testa—and the fact that she did in fact email Testa and Ms. Knipfing with her complaint on November 2, 2018 establishes the existence and feasibility of that process. (Defs.' Mot. at 17; Defs.' 56.1 Stmt. ¶ 80; Pl.'s 56.1 Resp. ¶ 80). Defendants also submitted Orrego's deposition testimony, where she says she does not remember having "raised any issues or any of the conduct[] by Ms. Zantua" to Ms. Knipfing prior to the November 2, 2018 email, and says she would have to check her diary. (Defs.' 56.1 Stmt. ¶ 83¹⁰; Orrego Dep. at 185:14-20). That diary, both parties agree, does not mention

¹⁰ In her responsive 56.1 Statement, Orrego qualifies her admission of this statement with the additional fact that she once mentioned Zantua's harassment to Ms. Knipfing, but the only response she received was that Ms. Knipfing was not interested. (Pl.'s 56.1 Resp. ¶ 83). But Orrego presents no evidence or details to support that vague contention, so the Court cannot credit it.

Orrego ever complaining about Zantua's harassment to Ms. Knipfing. (Defs.' 56.1 Stmt. ¶ 84; Pl.'s 56.1 Resp. ¶ 84).

Orrego does not allege that there was no avenue to complain, but she argues that the Knipfings knew of Zantua's conduct through two complaints¹¹ she lodged — one to Testa on October 16, 2018, and the other being the November 2, 2018 email she sent to Testa and Ms. Knipfing — but that they took no corrective action. (Pl.'s Mot. at 9). The evidence Orrego points to regarding the October 16, 2018 report is a transcription of an audio recording of a conversation between her and Testa, where almost every line is largely marked "inaudible," and the Court can discern no evidence of a report to Testa of Zantua's misconduct. (Audio Transcription, attached to Pl.'s Opp'n as Ex. 8, Dkt. No. 224-11). That leaves the November 2, 2018 report, for which there is no genuine dispute that the Knipfings took prompt action, including: immediately forwarding Orrego's complaint to Mr. Knipfing, who met with Orrego four days later to discuss her complaints, requested Orrego send whatever evidence she had, and then retained a private security company to investigate the allegations the following week. (Defs.' 56.1 Stmt. ¶¶ 88–102; Pl.'s 56.1 Resp. ¶¶ 88–102).

"The standard for reviewing the appropriateness of an employer's response to co-worker harassment is essentially a negligence one, and reasonableness depends among other things on the gravity of the harassment alleged." *Summa*, 708 F.3d at 125

¹¹ Orrego seems to claim that she was "demot[ed] from nanny to housekeeper on August 15, 2018, following earlier complaints" — but none of the cited evidence supports the contention that earlier complaints existed or were the cause of termination. (Pl.'s Opp'n at 11).

(quotation omitted). The Knipfings immediately met with Orrego and hired an external investigation company to evaluate her complaint, which cannot be found to be an unreasonable or inappropriate response. *See, e.g., id.* at 125 (finding the employer's response reasonable and appropriate because it "took action at once" when misconduct was reported); *Lekettey*, 637 F. App'x at 662 ("Plaintiff's complaint alleges no facts from which it can be plausibly inferred that defendants were negligent or unresponsive to her complaints about the workplace."). Orrego has "failed to produce evidence that [Defendants were] dilatory in [their] response," *Whidbee*, 223 F.3d at 73, and there are no other incidents where Defendants took no action in response to a complaint by Orrego; thus summary judgment is appropriate on Orrego's hostile work environment claim.

Although Orrego does not clearly make the argument, the Court separately evaluates whether the Knipfings *should* have, in the exercise of reasonable care, known about Zantua's alleged misconduct. Uzcategui had complained about Zantua's conduct approximately one year before Orrego did. (Pl.'s 56.1 Stmt. ¶ 33; Investigative Memo dated Nov. 21, 2018, attached to Pl.'s Mot. as Ex. 13, Dkt. No. 226-18 at 3). The external investigation found that Uzcategui admitted "to approaching [Mr. Knipfing] with regards to the way [Zantua] was treating her," and that "things were somewhat better" after that, but then "reverted back" to how things were. (Investigative Memo at 3). Orrego says the Knipfings "took no corrective action," which allowed Zantua's alleged harassment to persist, including against her. (Pl.'s 56.1 Stmt. ¶ 33). But that mischaracterizes the report, which clearly states that conditions improved after Uzcategui made her complaint to Mr. Knipfing. (Investigative Memo at 3). The fact

that the alleged misconduct started again, after having resolved, does not automatically suggest that the Knipfings knew or should have known *Orrego* was being harassed. *E.g., Summa*, 708 F.3d at 125 (finding imputation of liability improper despite multiple separate instances of harassment, since each report brought to a supervisor's attention was "dealt with quickly and in proportion to the level of seriousness of the event"); *Bentley*, 935 F.3d at 92–93 (holding that inconsistent evidence suggesting defendant had notice about harassment could not create a fact issue, and prompt investigation followed the report of allegedly hostile work environment shown by the record, so employer could not be found negligent and summary judgment was appropriate).

To summarize, Zantua's conduct cannot be imputed to the Knipfings or Old Westbury under § 1981. The federal and state standards differ with respect to the Knipfings' and Old Westbury's liability for Zantua's alleged harassment, since she is not a supervisor, in one regard: under the NYSHRL, "[a]n employer cannot be held liable for an employee's discriminatory act unless the employer became a party to it by encouraging, condoning, or approving it." *Hoit v. Cap. Dist. Transp. Auth.*, 805 F. App'x 41, 45 (2d Cir. 2020) (quotation omitted). Because the Court finds that Zantua's conduct cannot be imputed to the other Defendants under the more relaxed federal standard, it also does not meet the NYSHRL's more rigorous requirement of encouragement or approval.

Since the Court concludes that Zantua's conduct cannot be imputed to the Knipfings or Old Westbury, it need not and does not determine whether *Orrego's* "showing of harassment was sufficiently severe or pervasive to constitute a hostile

work environment.” *Summa*, 708 F.3d at 124. Orrego’s hostile work environment claim against the Knipfings and Old Westbury is dismissed.

II. Retaliation

Section 1981 and NYSHRL retaliation claims are analyzed under the three-step burden shifting framework derived from *McDonnell Douglas Corp. v. Green*, 411 U.S. 792 (1973), and according to Title VII principles. *Alvarado*, 685 F. App’x at 7. Under that framework, if the plaintiff establishes a prima face case of retaliation, “the defendant must then articulate a legitimate, non-discriminatory reason for its action.” *Hernandez v. Kwiatt Eye & Laser Surgery, PLLC*, No. 23-7679, 2024 WL 5116365, at *1 (2d Cir. Dec. 16, 2024). “To make out a prima facie case of retaliation, a plaintiff must make four showings: that (1) she engaged in a protected activity; (2) her employer was aware of this activity; (3) the employer took adverse employment action against her; and (4) a causal connection exists between the alleged adverse action and the protected activity.” *Id.* *3 (quotation omitted). If the defendant produces a non-retaliatory reason for the adverse action, the plaintiff “must then prove that her protected activity was a ‘but-for’ cause of her firing, which she can do by showing that [defendant’s] proffered reason is pretextual.” *Knox v. CRC Mgmt. Co., LLC*, 134 F.4th 39, 49 (2d Cir. 2025) (quotation omitted); *see also Alvarado*, 685 F. App’x at 7 (“‘[B]ut-for’ causation does not require proof that retaliation was the only cause of the employer’s action, but only that the adverse action would not have occurred in the absence of the retaliatory motive.” (quotation omitted)); *Ferrara v. Sterling, Inc.*, No. 23-0454, 2024 WL 485742, at *2 (2d Cir. Feb. 8, 2024) (“[W]ith respect to causation, [plaintiff] must establish that retaliation . . .

was a ‘but-for’ cause of his demotion, not simply a ‘substantial’ or ‘motivating’ factor in the employer’s decision.” (quotation omitted)).

Defendants do not dispute that Orrego has made out a prima facie case of retaliation. There is no dispute that Orrego engaged in protected activity and that her employer was aware of it: she complained of racial discrimination to Testa and Ms. Knipping on November 2, 2018. (Defs.’ Mot. at 19; Pl.’s Opp’n at 10–11). And Orrego’s employment was terminated on November 27, 2018, an adverse employment action that is close enough in temporal proximity to presumptively establish a causal connection with her protected activity. (Defs.’ Mot. at 20; Pl.’s Opp’n at 11); *e.g.*, *Summa*, 708 F.3d at 128 (“[T]he combination of reasonably close temporal proximity and the particular context in this case is sufficient to infer causation in establishing a prima facie case of retaliation[.]”).

Under *McDonnell Douglas*, the burden now shifts back to Defendants “to articulate some legitimate, non-retaliatory reason for the employment action.” *Philbert v. N.Y.C Dep’t of Educ.*, No. 24-0804, 2025 WL 3251187, at *1 (2d Cir. Nov. 21, 2025) (quotation omitted) (noting that defendants’ burden here “is one of production, not persuasion” (quotation omitted)). “The plaintiff must then produce evidence and carry the burden of persuasion that the proffered reason is a pretext.” *Id.* (quotation omitted). “At the third step, the presumption of retaliation dissipates, and the plaintiff must prove that the desire to retaliate was [a] but-for cause of the challenged employment action.” *Carter v. TD Bank, N.A.*, No. 23-0950, 2024 WL 2828470, at *3 (2d Cir. June 4, 2024) (quotation omitted). A plaintiff “need not prove that the employer’s

stated reason was *false*"; she "need only show that the employer's stated reason — even if true or factually accurate — was not the 'real reason,' in the sense that it was not the *entire* reason due to a coexisting impermissible consideration." *Bart v. Golub Corp.*, 96 F.4th 566, 575 (2d Cir. 2024) (emphasis in original). In other words, it is the plaintiff's burden "to produce admissible evidence showing circumstances that would be sufficient to permit a rational finder of fact to infer that the defendant's employment decision was more likely than not based in whole or in part on discrimination." *Id.* at 576 (quotation omitted).

Defendants have articulated multiple non-retaliatory reasons for Orrego's termination, which were also provided contemporaneously with her termination letter: 1) Orrego had been secretly recording conversations and taking unauthorized pictures and videos in violation of the NDA she signed; 2) Orrego told the outside investigators that she did not want to continue working for the Knipfings if Uzcategui remained employed; and 3) Orrego made allegations that the Knipfings' children were being physically abused by Uzcategui, but later confirmed no such abuse was taking place. (Defs.' Mot. at 20; Defs.' 56.1 Stmt. ¶¶ 104–110; Termination Letter).

Orrego makes several arguments that these proffered reasons are pretextual. *See Licinio v. New York*, No. 24-2564, 2025 WL 1693108, at *2 (2d Cir. June 17, 2025) ("To prove pretext, a plaintiff can demonstrat[e] weaknesses, implausibilities, inconsistencies, or contradictions in the employer's proffered legitimate, nonretaliatory reasons for its action." (quotation omitted)), *cert. denied*, No. 25-0587, 2026 WL 79971 (U.S. Jan. 12, 2026). Her strongest arguments challenge the reason related to her

supposedly unauthorized pictures and videos. Orrego argues that the photos and videos she took were authorized by Zantua and the Knipfings, and that Ms. Knipfing was previously aware of them. (Pl.'s Opp'n at 12). She also asserts, in conclusory fashion, that the NDA was void and that prior employees took photos without any repercussions.¹² (*Id.*). In support of these arguments, Orrego produced several text messages with Ms. Knipfing in which Orrego sent photos—for example, of the children in the playroom in March 2018—to a warm reception by Ms. Knipfing. (Text Messages, attached to Pl.'s Opp'n as Ex. 6, Dkt. No. 224-9). But Orrego has not produced evidence that the Knipfings knew other employees had taken photos, nor does the evidence she supplied—of a few pictures shared only with Ms. Knipfing in response to questions about where the children were—support her blanket statement that the 821 photos and 172 videos she took were “authorized.” (Pl.'s Opp'n at 12).

Orrego's burden at this stage is not merely one of production. She must persuasively show that the proffered reasons for her termination are a pretext for the true retaliatory motive. *Philbert*, 2025 WL 3251187, at *2 (affirming grant of summary judgment where plaintiff's evidence of pretext “d[id] not provide a reasonable basis on

¹² “[E]vidence of disparate treatment of *similarly situated individuals* allows for the conclusion that the reasons advanced by an employer . . . are pretextual.” *Summa*, 708 F.3d at 130 (emphasis added). Orrego never alleges that the other employees who took photos were remotely similarly situated to her. Orrego took hundreds of photos and videos, and also secretly recorded a conversation with another nanny in the presence of a third party not employed by the Knipfings, told external investigators that she did not want to keep working for the Knipfings if the other nanny remained employed, and finally, made claims of child abuse to the Knipfings and then later confirmed that no such abuse was occurring. She has thus, not met her burden in showing that other employees that engaged in *similar conduct* were treated more favorably to permit a factfinder to conclude that the proffered rationale for her termination was pretextual.

which a jury could conclude that [defendant's] desire to retaliate against her was a but-for cause of her termination," given the other enumerated bases for firing). But she has not done so. She has essentially disputed the bases offered for her termination. That, however, does not suggest that the real (or even partial) motivation for her firing was that her employer was retaliating against her for complaining about harassment in the first instance. So, even fully crediting Orrego's contention that some photos she took seem to have been authorized by Ms. Knipfing, a reasonable factfinder still could not conclude retaliation was a but-for cause of Orrego's termination. *See Licinio*, 2025 WL 1693108, at *2 ("The existence of a scintilla of evidence is insufficient to defeat a summary judgment motion." (quotation omitted)).¹³

As for the other non-retaliatory reasons, Orrego calls them pretextual because her complaint focused on Zantua's harassment, not Uzcategui, and because she says she did not retract her claim of child abuse, contrary to Defendants' characterization. (Pl.'s Opp'n at 12). These quibbles do not demonstrate Defendants' proffered reasons are without merit, let alone that they are pretextual.

"Even construing this evidence in the light most favorable" to Orrego, as this Court must, she "has failed to produce sufficient admissible evidence from which a reasonable juror could infer that the explanations given by [Defendants] were pretextual." *Licinio*, 2025 WL 1693108, at *2 (quotation omitted); *e.g.*, *Uttarwar v. Lazard Asset Mgmt. LLC*, No. 24-1085, 2025 WL 704278, at *4 (2d Cir. Mar. 5, 2025) ("While

¹³ Orrego's termination letter took significant issue with Orrego having recorded a conversation with Uzcategui discussing their work "in the presence of a member of the public" – a reason Orrego does not refute at all. (Termination Letter).

temporal proximity, together with other evidence such as inconsistent employer explanations, may be enough to defeat summary judgment, Uttarwar has failed to provide evidence calling into question the legitimacy of the defendants' explanations for his termination[.]"); *Carter*, 2024 WL 2828470, at *4 ("Simply put, the evidence Carter has adduced through discovery would not allow a reasonable factfinder to find the required but-for causal connection between his complaint and his termination, despite the modest temporal proximity between the two."); *Ferrara*, 2024 WL 485742, at *3 ("Here, assuming *arguendo* that Ferrara established a *prima facie* case of retaliation, he has not set forth evidence to rebut Sterling's legitimate, nondiscriminatory reason for his demotion from district manager to store manager[.]").

Thus, after evaluating Orrego's retaliation claim under each step of the *McDonnell Douglas* framework, the Court concludes that summary judgment is appropriate, and the claim is dismissed.

III. Sanctions

Both parties, in their respective summary judgment motions, ask the Court to sanction the other side. (*E.g.*, Defs.' Mot. at 22; Pl.'s Mot. at 14-15).

Orrego requests sanctions based on alleged discovery misconduct. (Pl.'s Mot. at 14). Her requests are largely baseless and do not warrant sanctions—for example, stating that Defendants' "depositions were evasive" and that they contained "forged

signatures.” (*Id.*). To the extent that Orrego requests leave under Rule 15(a)¹⁴ to file a second amended complaint to account for additional damages and based on alleged discovery misconduct in this case and “ongoing abuse,” largely premised on filings or determinations made years ago in other judicial or administrative proceedings that Orrego initiated, (*id.* at 9–10, 15–16), the request is denied, *e.g.*, *AEP Energy Servs. Gas Holding Co. v. Bank of Am., N.A.*, 626 F.3d 699, 726 (2d Cir. 2010) (affirming denial of request to amend made “three years after the commencement of the lawsuit and several months after cross-summary judgment motions had been filed”); *McCarthy v. Dun & Bradstreet Corp.*, 482 F.3d 184, 200 (2d Cir. 2007) (collecting cases affirming denial of leave to amend in light of delay and advanced stage of case).

Defendants ask for Orrego to be deemed a vexatious litigant and for the imposition of monetary sanctions. (Defs.’ Mot. at 22). As a preliminary matter, Defendants’ request for monetary sanctions incurred with their summary judgment motion practice and Orrego’s conduct in this lawsuit, (*id.*), is denied. This particular lawsuit is not entirely frivolous: it survived a motion to dismiss and proceeded to summary judgment.

That being said, the Court previously instituted filing injunctions to prevent abusive frivolous filings. (*See* Order dated Aug. 14, 2025, Dkt. No. 210; Order dated Sep. 16, 2025). This is one of nine lawsuits Orrego has filed stemming from her

¹⁴ Under that Rule – and since there has not been any Rule 16 scheduling order in this case – “the only ‘grounds on which denial of leave to amend has long been held proper’ are upon a showing of ‘undue delay, bad faith, dilatory motive, [or] futility.’” *Sacerdote v. New York Univ.*, 9 F.4th 95, 115 (2d Cir. 2021) (quoting *Loreley Fin. (Jersey) No. 3 Ltd. v. Wells Fargo Sec., LLC*, 797 F.3d 160, 190 (2d Cir. 2015)).

employment with the Knipfings, and the fifth in federal court, numbers that do not begin to capture the numerous related administrative complaints she has filed with various state agencies. (*See* Defs.' 56.1 Stmt. ¶¶ 128, 131, 138, 140, 148, 150, 152, 155). She has filed lawsuits or administrative complaints against three law firms, (*id.* ¶¶ 131, 148, 160, 163), two employers, (*id.* ¶ 144), and twelve judges (*id.* ¶¶ 127, 152, 155), as well as judicial staff, (*id.* ¶¶ 152, 155). She has also lodged judicial complaints and sought to recuse four District and Magistrate Judges – almost every federal judge assigned to this case. (*Id.* ¶ 171). In this case alone, Orrego has filed twelve notices of appeal, requests for interlocutory appeals, or petitions for a writ of mandamus. (Dkt. Nos. 152, 166, 176, 178, 206, 212, 216, 217, 219, 234, 239, 240).¹⁵ She has filed nineteen motions for reconsideration or vacatur of orders – including of orders denying reconsideration, (Dkt. Nos. 48, 90, 110, 113, 114, 117, 129, 131, 142, 143, 144, 145, 147, 148, 149, 150, 151, 172, 199), until she was eventually prohibited by this Court from “seeking reconsideration or a redo of prior decisions,” (Order dated July 8, 2025). With rare exception, limited to avoiding a single motion to dismiss, Orrego has not prevailed in these actions or individual motions. And she has already been separately subject to monetary sanctions and admonishments for frivolous litigation and threatening judicial

¹⁵ The latest of these – appeals from filing injunctions and recusal denials, with requests to proceed *in forma pauperis* – were recently consolidated and dismissed *sua sponte* by the Second Circuit for lack of jurisdiction. (*See* Mandate of USCA dated May 6, 2026, Dkt. No. 243 at 2 (dismissing appeals in: 25-2225, 25-2434, 25-3217, 25-2239, 25-2437, and 25-3208)).

officers in a state court proceeding.¹⁶ Orrego has also engaged in a pattern of initiating judicial misconduct complaints, sending emails to the judges of this court, including the Chief District Judge, and bombarding the Clerk's Office and chambers of judges with phone calls and filings, behaviors that are not evident from the face of the dockets of her cases, but demonstrate why the Court is obligated to enter an injunction in the case.

This Court has already instituted filing injunctions in Orrego's open cases in this District, after multiple warnings, because it found "Plaintiff has abused her ability to file papers with the Court," including by "filing repetitive motions on issues that have previously been denied." (Order dated Aug. 14, 2025, Dkt. No. 210 at 2). After that injunction, Orrego "filed multiple applications seeking leave to file additional motions and/or open new cases" that "not only violate the filing injunction, but are unnecessarily duplicative material." (Order dated Sep. 16, 2025). As a result, the Court prohibited Orrego from making any further filings in her open cases and from using the pro se portal, absent further order of the Court. (*Id.*). The Court noted that it would lift

¹⁶ Defendants included a transcript of proceedings from one of Orrego's state court cases, in which she was fined \$ 2,500 for a frivolous letter that intimidated and threatened an expert witness in the case. (*See* Defs.' 56.1 Stmt. ¶ 129). In imposing the sanction, the court was required to remove Orrego from the courtroom for disobeying court orders, and stated on the record to her: "You have attempted to intimidate me, you've harassed me, you've harassed my staff[.]" (*Id.*). That court also determined that "there may be criminal conduct that arises from the contents of [Orrego's] letter," and referred it to the district attorney to investigate. (*Id.*).

In a recent letter, Defendants separately drew the Court's attention to the fact that Orrego just initiated yet another state court lawsuit against Defendants' counsel, Savitsky, and others, which she served on May 1, 2026. (Defs.' Letter dated May 5, 2026, Dkt. No. 242 at 1-2). Defendants also noted a March 24, 2026 social media post by Orrego directed at Defendants, their lawyers, the undersigned, Magistrate Judge Shields, and several other public officials, saying "[s]omething very bad is going to happen." (*Id.* at 2).

the injunction following resolution of all pending motions, to permit Orrego to object, appeal, seek reconsideration, or make any pre-trial filings. (*Id.*).

In deciding whether to impose an anti-filing injunction, the Second Circuit has identified the following factors for consideration:

(1) the litigant's history of litigation and in particular whether it entailed vexatious, harassing or duplicative lawsuits; (2) the litigant's motive in pursuing the litigation, e.g., does the litigant have an objective good faith expectation of prevailing?; (3) whether the litigant is represented by counsel; (4) whether the litigant has caused needless expense to other parties or has posed an unnecessary burden on the courts and their personnel; and (5) whether other sanctions would be adequate to protect the courts and other parties.

Eliahu v. Jewish Agency for Israel, 919 F.3d 709, 714 (2d Cir. 2019) (quotation omitted).

It is plain from the above recitation – and the litigation history that has been chronicled at length in Defendants' Rule 56.1 Statement, (*see* Defs.' 56.1 Stmt. ¶¶ 118–78) – that all factors weigh in favor of imposing a filing injunction, e.g., *Zappin v.*

Comfort, No. 23-7363, 2024 WL 5001624, at *3 (2d Cir. Dec. 6, 2024) ("Given that other sanctions have proven ineffective at protecting the courts and the parties, it was not an abuse of discretion for the district court to enter a pre-filing injunction here.");

Immerso v. U.S. Dep't of Lab., No. 20-4064, 2022 WL 17333083, at *2 (2d Cir. Nov. 30, 2022) (affirming bar against further filings or initiating new proceedings in the Eastern District absent leave of the court). Although Orrego is currently pro se, she has been

assisted by counsel at various stages in this litigation and others, and there is “no basis to afford [her] the latitude usually granted to *pro se* litigants.”¹⁷ *Eliahu*, 919 F.3d at 715.

While filing injunctions are only warranted by “extraordinary circumstances,” that bar is met here. *Id.* at 714 (quotation omitted). Orrego is enjoined from initiating future actions in the Eastern District of New York.

CONCLUSION

For the reasons explained above, Defendants’ motion for summary judgment is granted, and Orrego’s motion for summary judgment is denied. Orrego’s pending motion for leave to appeal *in forma pauperis*, (Dkt. No. 238), is denied for the reasons set forth in the Court’s December 5, 2025 Order, and the pending premotion conference request, (Dkt. No. 232), is denied as moot.

The present filing injunction is lifted solely for the purpose of filing any notice of appeal. Aside from filings related to her appeal, Orrego is enjoined from further filings in this case, and from initiating future actions in the Eastern District of New York absent

¹⁷ As noted above, Orrego has fired and sued several law firms that represented her in related matters. And in this case, while the Court initially declined to appoint Orrego pro bono counsel, the Court did ultimately appoint counsel for Orrego, (Order dated Nov. 16, 2021), but she requested their removal within a matter of months, and ultimately opted to proceed pro se, (Order dated Apr. 19, 2022, Dkt. No. 52).

a Court order.¹⁸ The Clerk of Court is directed to distribute this memorandum and order to all Clerk's Office personnel as appropriate.

SO ORDERED.

/s/ Sanket J. Bulsara
SANKET J. BULSARA
United States District Judge

Date: May 8, 2026
Central Islip, New York

¹⁸ To eliminate the need to write a decision every time Orrego makes a frivolous filing, the Clerk of Court is directed to open a miscellaneous case entitled "In re Orrego," and to file a copy of this Order under that docket number. The matter is then to be administratively closed. Any future filings by Orrego, including any motion for reconsideration, shall be filed under that miscellaneous docket number. The Court will review each filing. If the filing is found to be frivolous, no further action will be taken. If the filing states a claim that is not frivolous or does not fail to state a claim, the Court will direct the Clerk of Court to open a new civil matter in which the filing will be docketed, and the matter will proceed as a new case in the ordinary course. *E.g., Mai v. NYSOTDA*, No. 25-MC-2840, 2025 WL 2947168, at *2 (E.D.N.Y. Aug. 20, 2025).

EXHIBIT 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
LIDIA M. ORREGO,

Plaintiff,

- against -

JUDGMENT
CV 20-3361 (SJB) (AYS)

KEVIN KNIPFING, et al.,

Defendants.
-----X

A Memorandum and Order of the Honorable Sanket J. Bulsara, United States District Judge, having been filed on May 8, 2026, granting Defendants' motion for summary judgment; denying Plaintiff's motion for summary judgment; denying Plaintiff's motion for leave to appeal *in forma pauperis*; ordering a permanent filing injunction on Plaintiff, and that it be lifted solely for the purpose of filing any notice of appeal; enjoining Plaintiff from further filings in this case and from initiating future actions in the Eastern District of New York absent a Court order; and directing the Clerk of Court to enter judgment and close the case, it is

ORDERED AND ADJUDGED that Plaintiff Lidia M. Orrego take nothing of Defendants Kevin Knipfing, Stephanieanna James-Knipfing, Old Westbury EDDIC LLC, Old Westbury LLC, Steven Savitsky, and Teresa A. Zantura; that Defendants' motion for summary judgment is granted; that Plaintiff's motion for summary judgment is denied; that Plaintiff's motion for leave to appeal *in forma pauperis* is denied; that the Court lifts the permanent filing injunction on Plaintiff Orrego solely for the purpose of filing any notice of appeal; that Orrego is enjoined from further filings in this case and initiating future actions in the Eastern District of New York absent a Court order; and that this case is closed.

Dated: May 8, 2026
Central Islip, New York

BRENN A. MAHONEY
CLERK OF COURT

BY: /S/ JAZMIN M. CUBANO
DEPUTY CLERK

EXHIBIT 3



Lidia Orrego <lilorrego@gmail.com>

Activity in Case 2:20-cv-03361-PKC-TAM Orrego v. Knipfing et al Order of Recusal

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Mon, Nov 17, 2025 at 12:56 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 11/17/2025 at 12:56 PM EST and filed on 11/17/2025

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-PKC-TAM
Filer:
Document Number: No document attached

Docket Text:

ORDER OF RECUSAL. Type of Recusal: party. Ordered by Judge Sanket J. Bulsara on 11/17/2025. Judge Sanket J. Bulsara, Magistrate Judge Anne Y. Shields recused. Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings. (BBM)

2:20-cv-03361-PKC-TAM Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego lilorrego@gmail.com

2:20-cv-03361-PKC-TAM Notice will not be electronically mailed to:

EXHIBIT 4



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Order on Motion to Disqualify Judge

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Wed, Nov 5, 2025 at 2:27 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 11/5/2025 at 2:27 PM EST and filed on 11/5/2025

Case Name: Orrego v. Knipfing et al

Case Number: 2:20-cv-03361-SJB-AYS

Filer:

Document Number: No document attached

Docket Text:

ORDER: In light of the impending reassignment of this case, the current motions, [203], [217], [218], [221], and [226], are deemed withdrawn and should be refiled consistent with the individual practices of the new Judge(s) and only with permission of the newly assigned Judge(s). So Ordered by Judge Sanket J. Bulsara on 11/5/2025. (RB)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlrivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:



Lidia Orrego <liorrego@gmail.com>

Activity in Case 2:20-cv-03361-SJB-AYS Orrego v. Knipfing et al Case Assigned/Reassigned

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Wed, Nov 26, 2025 at 2:46 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 11/26/2025 at 2:46 PM EST and filed on 11/26/2025

Case Name: Orrego v. Knipfing et al
Case Number: 2:20-cv-03361-SJB-AYS
Filer:
Document Number: No document attached

Docket Text:

Case Reassigned to Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields. Judge Pamela K. Chen, Magistrate Judge Taryn A. Merkl no longer assigned to the case. Please download and review the Individual Practices of the assigned Judges, located on our website. Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (BBM)

2:20-cv-03361-SJB-AYS Notice has been electronically mailed to:

Kuuku Angate Minnah-Donkoh kminnahdonkoh@grsm.com, evelez@grsm.com, vls_nysupport@grsm.com

Brian P. McLaughlin bmclaughlin@nassaucountyny.gov

Alex Dumas adumas@grsm.com, dlrivera@grsm.com

Edward E. Warnke ewarnke@mizrahikroub.com

Lidia M. Orrego liorrego@gmail.com

2:20-cv-03361-SJB-AYS Notice will not be electronically mailed to:

SR-5
FEDERAL BAR COUNCIL QUARTERLY PROFILE
OF JUDGE SANKET J. BULSARA

Federal Bar Council Quarterly
“Judge Sanket Bulsara”
Jun./Jul./Aug. 2025
Vol. XXXII, No. 4

DOCUMENT

Federal Bar Council Quarterly Profile of Judge Sanket J. Bulsara

PURPOSE AND RELEVANCE

Submitted as contextual, non-docket material concerning Judge Bulsara's publicly stated approach to case management, courtroom participation, and oral argument.

The article recognizes the “vast diversity of civil matters and litigants” before the Court and reports Judge Bulsara's statement that a “one-size-fits-all approach to case management doesn't work.” In its section titled “Be Prepared,” the article describes Judge Bulsara's statements concerning “lawyers appearing for oral arguments in his court” and the importance of sufficiently prepared “counsel” engaging in dialogue with the Court.

The article is not submitted, standing alone, as proof of discriminatory treatment of pro se litigants. Its relevance arises from comparison with the official record in 20-cv-3361 concerning Complainant's treatment as a pro se litigant, including her opportunity to be heard, Rule 56 submissions, requests to submit electronic evidence, and evidence submitted in DE [224], DE [224-2], DE [226], DE [228], and DE [229].

SUPPLEMENTAL RECORD — SR-5
CONTEXTUAL NON-DOCKET MATERIAL — NOT A SEPARATE
EXHIBIT



THE CONVERSATION

SHARE THIS ARTICLE -



JUDGE SANKET BULSARA



TRAVIS J. MOCK

On December 20, 2024, Judge Sanket Bulsara received his commission as a district judge of the U.S. District Court for the Eastern District of New York. Nominated by President Biden, Judge Bulsara fills the seat vacated when Judge Joan Azrack took senior status. Of course, Judge Bulsara is not new to the Eastern District bench, having served as a magistrate judge from 2017 to 2024.

A child of first-generation immigrants from India, Judge Bulsara attended Harvard College and Harvard Law School before clerking for Judge John G. Koeltl of the U.S. District Court for the Southern District of New York. After a decade at Wilmer Cutler Pickering Hale & Dorr in New York City, Judge Bulsara moved to Washington, D.C., to join the General Counsel's Office of the Securities and Exchange Commission. There, Judge Bulsara served first as Deputy General Counsel for Appellate Litigation, Adjudication, and Enforcement. As one of three deputy general counsels, Judge Bulsara supervised a broad portfolio of matters and was privileged, he said, to work with "amazing legal minds." Judge Bulsara then served briefly as acting general counsel of the SEC before returning to New York City for "the wonderful opportunity to continue [his] public service" as a magistrate judge.

Judge Bulsara confirmed that his experience as a magistrate judge informs his service as a district judge. His nearly eight years as a magistrate judge provided "a granular understanding" of the "vast

diversity of civil matters and litigants” that come before the court. “A one-size-fits-all approach to case management doesn’t work,” Judge Bulsara said. His experience has also confirmed for him the critical importance of providing trial-ready litigants “that last opportunity to settle” before proceeding to trial.

Deep Appreciation for Colleagues

Judge Bulsara also confirmed that his time as a magistrate judge instilled “a deep appreciation” for his magistrate judge colleagues. “The relationship between the district judges and the magistrate judges is really a partnership,” he explained. That partnership is particularly vital in the Eastern District of New York, where magistrate judges oversee pretrial proceedings in virtually all civil cases.

Asked what has been the most rewarding aspect of his first months as a district judge, Judge Bulsara responded that he particularly enjoys presiding over trials. “It is a great honor,” he said. In particular, Judge Bulsara has been struck by how seriously and diligently jurors approach their duties. “In a time of deep polarization, it is refreshing to see diverse members of the public come together to resolve issues.” Judge Bulsara continued, “While new jurors often blanch at the task of serving on a jury, to a person they find it a valuable experience.”

An Active Participant

In addition to his work on the bench, Judge Bulsara remains an active participant in the legal community both inside and outside the courthouse. Judge Bulsara continues his service as co-chair of the Eastern District of New York-Southern District of New York Joint Local Rules Committee, as well as his membership on the Eastern District of New York’s Criminal Justice Act Committee. Outside the courthouse, Judge Bulsara is a member of the Lawyers Advisory Council for the New York City Urban Debate League, an adjunct professor of securities litigation at St. John’s Law School, and a guest instructor at the Harvard Law School Trial Advocacy Workshop.

A longtime friend of the Federal Bar Council, Judge Bulsara delivered introductory remarks at the Council’s 2025 Law Day Dinner, during which he read the very first Presidential Law Day Proclamation, issued in 1958 by President Dwight D. Eisenhower.

Be Prepared

Judge Bulsara offered words of wisdom to lawyers appearing for oral arguments in his court. “It is obvious and appreciated when lawyers are exceptionally well prepared. The purpose of oral argument,” Judge Bulsara said, “is not to lock lawyers into a box but to get a better understanding and a level of depth on certain arguments. That purpose is achievable only when counsel come sufficiently prepared to engage in a dialogue with the court.”

FURTHER READING

IT HAPPENED AT FRAUNCES TAVERN

Travis J. Mock discusses one of the most consequential legal proceedings in early American history, which unfolded inside Fraunces Tavern

THANKSGIVING DAY LUNCHEON DAY OF CELEBRATION

Travis J. Mock reports on the Thanksgiving Luncheon which celebrated Senior U.S. District Judge and recognized Bonita

Federal Bar Council Quarterly (ISSN 1075-8534) is published quarterly (Sept./Oct./Nov., Dec./Jan./Feb., Mar./Apr./May, Jun./Jul./Aug.) by the Federal Bar Council, 150 Broadway, Suite 505, New York, NY 10038-4300, (646) 736-6163, federalbar@federalbarcouncil.com, and is available free of charge at the Council's website, federalbarcouncil.org, by clicking on "Publications." Copyright 2025 by Federal Bar Council. All rights reserved. This publication is designed to provide accurate and authoritative information but neither the publisher nor the editors are engaged in rendering advice in this publication. If such expert assistance is required, the services of a competent professional should be sought. The articles and columns in this publication reflect only the present considerations and views of the authors. They do not purport to reflect the views or positions of the firms or organizations with which they are employed or affiliated, any of the former or present clients of the authors or their firms or organizations, the editors of this publication, or the members, board members or officers of the Federal Bar Council or Federal Bar Foundation, nor do they reflect a view or position of those organizations themselves.

FROM THE PRESIDENT
FROM THE EDITOR
FROM THE COURTS
SECOND CIRCUIT DECISIONS

FROM THE ARCHIVES
PETE'S CORNER
MEMBERSHIP
FEDERAL BAR COUNCIL

CONTACT

FEDERAL BAR COUNCIL
150 BROADWAY, SUITE 505
NEW YORK, NY 10038-4300

Subscribe To the Federal Bar Council Quarterly

Receive editions direct to your inbox.

BECOME A MEMBER

EDITORS

MANAGING EDITOR
STEVEN A. MEYEROWITZ

EDITOR-IN-CHIEF
BENNETTE D. KRAMER

FOUNDER
STEVEN M. EDWARDS

BOARD OF EDITORS

MARJORIE E. BERMAN
HON. SARAH L. CAVE
PETER G. EIKENBERRY
BRIAN M. FELDMAN
STEVEN FLANDERS

JAMES I. GLASSER
SHERRY N. GLOVER
STEVEN H. HOLINSTAT
LARRY H. KRANTZ
ADAM K. MAGID

HON. JOSEPH A. MARUTOLLO
TRAVIS J. MOCK
LAYALIZA SOLOVEICHIK
C. EVAN STEWART

We invite you to connect with us on



Website Design by [KRS Creative](#).

RECEIVED

26 AUG 11 AM 8:57

COMPLAINT OF JUDICIAL MISCONDUCT

Related to Pending Judicial Conduct Complaint Nos.

U.S. COURT OF APPEALS
SECOND CIRCUIT
NIGHT DEPOSITORY

02-25-90131-jm and 02-25-90132-jm

Concerning

HON. SANKET J. BULSARA

United States District Judge
Eastern District of New York

ORIGINAL — VOLUME I OF II

COMPLAINT AND SUPPORTING EXHIBITS

Complaint Form

Statement of Facts — Pages 1–5

Exhibit Index and Supporting Reference Sections

Exhibits 1–6

Related District Court Proceeding:

Orrego v. Knipping, et al.

EDNY Case No. **2:20-cv-03361**

Related Miscellaneous Proceeding:

EDNY Misc. Case No. **2:26-mc-01957-SJB**

Submitted by:

Lidia M. Orrego

Complainant, Pro Se

August 10, 2026

COMPLAINT OF JUDICIAL MISCONDUCT

Related to Pending Judicial Conduct Complaint Nos.

02-25-90131-jm and 02-25-90132-jm

Concerning

HON. SANKET J. BULSARA

United States District Judge
Eastern District of New York

ORIGINAL — VOLUME II OF II

SUPPORTING EXHIBITS AND SUPPLEMENTAL RECORD

Exhibits 7–12

Exhibit 10 — Digital Evidence

Disc 1 of 2 • Disc 2 of 2

Supplemental Record — SR-1 through SR-5

Related District Court Proceeding:

Orrego v. Knipfing, et al.

EDNY Case No. **2:20-cv-03361**

Related Miscellaneous Proceeding:

EDNY Misc. Case No. **2:26-mc-01957-SJB**

Submitted by:

Lidia M. Orrego

Complainant, Pro Se

August 10, 2026

RECEIVED

26 AUG 11 AM 8:57

U.S. COURT OF APPEALS
SECOND CIRCUIT
NIGHT DEPOSITORY