

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 26-899 Lead; 26-1576 Caption [use short title] Orrego v Knipfing

Motion for: **PLAINTIFF-APPELLANT'S MOTION FOR LEAVE TO FILE LIMITED
SUPPLEMENTAL EXHIBITS 2-5 IN SUPPORT OF MOTION FOR PANEL
RECONSIDERATION AND RECONSIDERATION EN BANC**

Set forth below precise, complete statement of relief sought:

Plaintiff-Appellant respectfully seeks leave to file limited supplemental Exhibits 2-5 in support of her pending Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026 Order, or Alternatively, for Clarification. Exhibits 2-5 consist of the Second Circuit's August 14, 2026 judicial-conduct acknowledgment; the August 26, 2026 Clerk-stamped judicial-conduct filing; the related Exhibit Index and Official Court Records Incorporated by Reference; and a demonstrative Visual Map identifying relevant portions of the underlying record. The exhibits are submitted as limited supplemental procedural and record-reference materials and not as adjudicated findings of judicial misconduct.

MOVING PARTY: Lidia M. Orrego☐ Plaintiff☐ Defendant☒ Appellant/Petitioner☐ Appellee/RespondentOPPOSING PARTY: 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, Teresa A. Zantua.

MOVING ATTORNEY: Lidia M. Orrego - Pro Se

[name of attorney, with firm, address, phone number and e-mail] Attorney

Address: 95-08 Queens Blvd. Apt 3E

Rego Park, NY 11374

Phone: (347) 453-2234

Email: orregoprose@gmail.com

OPPOSING ATTORNEY: Gordon Rees Scully Mansukhani LLP

Address : One Battery Park Plaza, 28th Floor

New York, NY 10004

Phone: (212) 269-5500

Email: kminnahdonkoh@grsm.com

Court- Judge/ Agency appealed from: Assigned Judges: District Judge Pamela K. Chen; Magistrate Judge Taryn A. Merkl

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☒ Yes☐ No (explain):See attached Certificate
of Service. Proof email.FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND
INJECTIONS PENDING APPEAL:

Has this request for relief been made below?

☐ Yes☒ No

Has this relief been previously sought in this court?

☐ Yes☒ No

Requested return date and explanation of emergency: _____

Opposing counsel's position on motion:

☐ Unopposed☐ Opposed☒ Don't Know

Does opposing counsel intend to file a response:

☐ Yes☐ No☒ Don't Know**Notice:** RECUSED Judges Nov. 17, 2025

Hon. Sanket J. Bulsara

Hon. Magistrate Judge Anne Y. Shields - EDNY

Is the oral argument on motion requested?

☒ Yes☐ No

(requests for oral argument will not necessarily be granted)

Has the appeal argument date been set?

☐ Yes☒ No

If yes, enter date: _____

Signature of Moving Attorney:

/s/ Lidia M. OrregoDate: 08/27/2026Service : ☒ Electronic ☐ Other [Attach proof of service]



Lidia Orrego <orregoprose@gmail.com>

Orrego v. Knipfing, et al. – Second Circuit Appeals Nos. 26-899 and 26-1576 – Motion for Leave to File Supplemental Exhibits 2–5

1 message

Lidia Orrego <orregoprose@gmail.com>

Thu, Aug 27, 2026 at 9:00 PM

To: Kuuku Minnah-Donkoh <kminnahdonkoh@grsm.com>, mcolwin@grsm.com

Cc: Dallas Rivera <drrivera@grsm.com>, Peter Cella <pcella@grsm.com>, Paulette Guerrero <pguerrero@grsm.com>, Lidia Orrego <lidia.orrego@justiceforlidia.nyc>, Lidia Orrego <lorrego@gmail.com>

Counsel GRSM,

Please be advised that today, August 27, 2026, I filed with the United States Court of Appeals for the Second Circuit my **Motion for Leave to File Limited Supplemental Exhibits 2–5 in Support of Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026 Order, or Alternatively, for Clarification**, together with the supporting Affirmation, Memorandum of Law, and Supplemental Exhibits 2–5.

Copies of the filed documents are attached to this email for service upon Gordon Rees Scully Mansukhani, LLP, as counsel for Defendants-Appellees.

Please confirm receipt.

Thank you,

Lidia M. Orrego

Plaintiff-Appellant, Pro Se

Appeals Nos. 26-899(L), 26-1576(Con)

Email: orregoprose@gmail.com

8 attachments

 **1_T-1080 Motion_08-27-2026.pdf**
538K

 **4_Certificado of Service.pdf**
484K

 **2_Affirmation.pdf**
176K

 **3_MOL.pdf**
939K

 **Exhibit 4_Dated 08-10-2026 EXHIBIT INDEX.pdf**
439K

 **Exhibit 2_Dated 08-14-2026 Case Number JCC 02-26-90052-jm.pdf**
1137K

 **Exhibit 5_Exhibit 7 - Visual Map of Evidence Suppressed_ Disregarded_Omitted_or Mischaracterized in the Post-Recusal Purported Act Docketed as DE 244 copy.pdf**
1247K

 **Exhibit 3_Dated 08-26-2026 JSB - Second Complaint.pdf**
4463K

**UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

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LIDIA M. ORREGO,

Plaintiff-Appellant,

-against-

KEVIN KNIPFING, also known as KEVIN JAMES,

STEPHANIEANNA JAMES-KNIPFING,

also known as STEFFIANA DE LA CRUZ,

OLD WESTBURY EDDIE LLC, OLD WESTBURY LLC,

STEVE SAVITSKY, and TERESA A. ZANTUA,

Defendants-Appellees.

-----X

Docket No. 26-899 (Lead) 26-1576

EDNY Case No. 20-cv-3361

**AFFIRMATION IN SUPPORT OF PLAINTIFF-APPELLANT'S MOTION
FOR LEAVE TO FILE LIMITED SUPPLEMENTAL EXHIBITS 2-5**

I, **Lidia M. Orrego**, Plaintiff-Appellant pro se, affirm under penalty of perjury

pursuant to 28 U.S.C. § 1746 that the following is true and correct:

I. PURPOSE OF THIS MOTION

1. I am the Plaintiff-Appellant in these consolidated appeals and submit this Affirmation in support of my **Motion for Leave to File Limited Supplemental Exhibits 2-5** in support of my pending Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026, Order, or Alternatively, for Clarification.

2. I respectfully seek leave to submit four limited supplemental exhibits concerning subsequent procedural developments and providing organizational

roadmaps to the official District Court and appellate records and evidence directly related to the pending reconsideration motion.

3. These exhibits are submitted through a separate motion because the reconsideration filing itself included the August 12, 2026, Order as Exhibit 1 and did not attach Exhibits 2–5.

4. Exhibits 2–5 document subsequent procedural developments and identify the official court records and evidence concerning the November 17, 2025, recusal and random reassignment; subsequent acts reflected in DE [244] and DE [245]; Miscellaneous Case No. 2:26-mc-01957-SJB; the June 24, 2026, Rule 60 Motion and Rule 62.1 request; and the related appellate proceedings.

5. The supplemental materials also identify the official records and evidence documenting the treatment of material evidence, false or inaccurate statements reflected in the challenged proceedings, judicial bias documented in the record, and the subsequent acts of the recused judicial officer after the November 17, 2025, recusal and reassignment.

6. The official record establishes that on November 17, 2025, Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields recused, and the case was randomly reassigned to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.”

7. Exhibits 2–5 identify the subsequent acts of the recused judicial officer and the official record supporting Plaintiff-Appellant’s position that those acts were undertaken without jurisdiction or authority following the recusal and reassignment.

8. The exhibits also connect those subsequent events to the unresolved Rule 60/Rule 62.1 proceeding that formed the basis of Plaintiff-Appellant’s request that these consolidated appeals temporarily be held in abeyance.

II. EXHIBIT 2 — AUGUST 14, 2026, SECOND CIRCUIT ACKNOWLEDGMENT

9. **Exhibit 2** is the August 14, 2026, acknowledgment issued by the Clerk of the United States Court of Appeals for the Second Circuit concerning Judicial Conduct Complaint No. **02-26-90052-jm**.

10. The acknowledgment confirms that the judicial-conduct complaint was received and filed on August 11, 2026.

11. Exhibit 2 establishes the procedural existence and filing status of that subsequent judicial-conduct proceeding.

12. The proceeding concerns the same underlying EDNY and appellate records relevant to the pending reconsideration motion, including the November 17, 2025, recusal and reassignment and subsequent docket activity.

III. EXHIBIT 3 — AUGUST 26, 2026, CLERK-STAMPED SECOND JUDICIAL MISCONDUCT COMPLAINT

13. **Exhibit 3** is the August 26, 2026, Clerk-stamped Second Judicial Misconduct Complaint concerning Judge Sanket J. Bulsara and related pending Judicial Conduct Complaint Nos. 02-25-90131-jm and 02-25-90132-jm.

14. The filing identifies **Orrego v. Knipfing, et al., EDNY Case No. 2:20-cv-03361**, and related Second Circuit Appeals Nos. **26-899 and 26-1576**.

15. Exhibit 3 is grounded in the official District Court and appellate records, the summary-judgment record, the June 24, 2026, Motion to Vacate and supporting submissions, and the documentary and electronic evidence submitted in the underlying proceedings.

16. Exhibit 3 identifies the November 17, 2025, 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.”

17. It then identifies the subsequent May 8, 2026, docket activity involving DE [244], DE [245], and Miscellaneous Case No. 2:26-mc-01957-SJB.

18. The filing identifies DE [244], including the provisions concerning the miscellaneous proceeding and filing restrictions, and connects that document to the November 17, 2025, recusal and reassignment record.

19. Exhibit 3 further identifies the official records and evidence concerning the treatment, omission, and mischaracterization of material evidence in the underlying

proceedings and the false or inaccurate statements reflected in the challenged post-recusal record.

20. The judicial bias documented in Exhibit 3 is tied to the underlying official record and evidence identified therein, including specific docket entries, orders, summary-judgment submissions, documentary evidence, electronic evidence, and subsequent proceedings.

21. These matters are therefore presented through the records and evidence from which they arise rather than as matters of personal belief.

22. Exhibit 3 further identifies my **June 24, 2026, Motion to Vacate**, which sought relief pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with an indicative ruling pursuant to Rule 62.1.

23. The June 24 Motion was supported by an Affirmation, Memorandum of Law, documentary exhibits, a Master Evidence Map, and electronic evidence.

24. The Motion was docketed in the miscellaneous proceeding as MC DE [6].

25. I thereafter notified the Second Circuit of the Rule 60/Rule 62.1 proceeding pursuant to FRAP 12.1 and sought temporary abeyance of the consolidated appeals while the District Court addressed that proceeding.

26. Exhibit 3 therefore connects the November 17, 2025, recusal and reassignment, the subsequent acts reflected in DE [244] and DE [245], the miscellaneous proceeding, MC DE [6], the FRAP 12.1 notices, and the appellate abeyance request.

27. These are the same procedural circumstances directly relevant to the pending reconsideration motion concerning the August 12, 2026, Order.

IV. EXHIBIT 4 — EXHIBIT INDEX AND OFFICIAL COURT RECORDS INCORPORATED BY REFERENCE

28. **Exhibit 4** is the August 10, 2026, Exhibit Index and **Official Court Records Incorporated by Reference** accompanying the judicial-conduct materials.

29. Exhibit 4 identifies the underlying official records of EDNY Case No. 2:20-cv-03361, Miscellaneous Case No. 2:26-mc-01957-SJB, and the related Second Circuit proceedings.

30. It identifies the November 17, 2025, Order of Recusal and Random Reassignment and the reassignment to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.”

31. It separately identifies MC DE [6], the June 24, 2026, Motion to Vacate under Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with the request for an indicative ruling under Rule 62.1.

32. Exhibit 4 further identifies the appellate records concerning FRAP 12.1 and the motions seeking to hold these appeals in abeyance while the Rule 60/Rule 62.1 proceeding remained pending.

33. It also identifies the underlying summary-judgment submissions and the records relevant to the treatment of the documentary and electronic evidence addressed in the Motion to Vacate.

34. Exhibit 4 provides an organizational roadmap connecting the subsequent judicial-conduct filings to the underlying official records upon which they are based.

35. The underlying exhibits and official court records themselves control.

V. EXHIBIT 5 — VISUAL MAP OF THE EVIDENTIARY RECORD

36. **Exhibit 5** is the Visual Map of Evidence Suppressed, Disregarded, Omitted, or Mischaracterized.

37. Exhibit 5 summarizes and organizes the evidentiary record identified in the Motion to Vacate and supporting submissions.

38. The Visual Map directs the reviewer to corresponding documentary evidence contained in the official court record, representative exhibits, and electronic evidence.

39. It organizes the record concerning the evidence submitted, the treatment of that evidence, the challenged summary-judgment proceedings, and the official records supporting those matters.

40. The Visual Map also assists in locating the evidence corresponding to the matters documented in Exhibit 3, including the post-recusal proceedings, treatment of material evidence, evidentiary omissions and mischaracterizations, false or inaccurate statements reflected in the challenged record, and documented judicial bias.

41. Exhibit 5 does not replace the underlying official records or evidence. It provides a concise roadmap for locating and reviewing them.

VI. RELATIONSHIP OF EXHIBITS 2–5 TO THE PENDING RECONSIDERATION MOTION

42. Exhibits 2–5 supplement rather than replace the materials previously submitted to this Court.

43. The principal procedural materials concerning the Rule 60/Rule 62.1 proceeding, the miscellaneous docket, FRAP 12.1, and the requested appellate abeyance were previously presented to this Court in connection with the July 23, 2026, application.

44. Exhibits 2 and 3 document subsequent procedural developments concerning those same underlying proceedings.

45. Exhibits 4 and 5 identify and organize the official records and evidence corresponding to those developments.

46. The requested supplementation permits the Court to examine the underlying official records concerning the November 17, 2025, recusal and reassignment, subsequent post-recusal activity, DE [244] and DE [245], the miscellaneous proceeding, MC DE [6], and the FRAP 12.1 proceedings.

47. It further permits the Court to locate the official records and evidence documenting the treatment and omission of material evidence, false or inaccurate statements reflected in the challenged proceedings, and judicial bias documented in the record.

48. These matters are directly connected to the Rule 60/Rule 62.1 proceeding whose continued pendency formed the basis of Plaintiff-Appellant's request for temporary appellate abeyance.

49. The supplementation is limited to four identified exhibits and does not alter the relief requested in the pending reconsideration motion.

50. The official District Court and appellate records remain the controlling sources for the underlying procedural events and evidence.

VII. RELIEF REQUESTED

51. For these reasons, I respectfully request that the Court grant leave to file **Supplemental Exhibits 2–5** in support of my pending **Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026 Order, or Alternatively, for Clarification**, so that the Court may consider the subsequent procedural developments and the corresponding official District Court and appellate records and evidence identified in those exhibits.

52. I respectfully request that the Court accept **Exhibits 2 and 3** as documentation of subsequent procedural developments directly connected to the matters presented in the pending reconsideration motion, including the November 17, 2025 recusal and random reassignment, the subsequent post-recusal proceedings, and the Rule 60/Rule 62.1 proceeding that formed the basis of my request for temporary appellate abeyance.

53. I further respectfully request that the Court accept **Exhibits 4 and 5** as organizational roadmaps to the corresponding official court records, documentary submissions, and electronic evidence, including the records concerning DE [244] and DE [245], Miscellaneous Case No. 2:26-mc-01957-SJB, MC DE [6], and the related FRAP 12.1 proceedings before this Court.

54. I respectfully request that the Court consider these supplemental materials together with the existing District Court and appellate records identified therein, with the underlying official records and evidence remaining controlling, in determining the pending request for panel reconsideration, reconsideration en banc, or alternatively clarification.

55. I further respectfully request such other and further relief as the Court deems just and appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: August 27, 2026

Rego Park, New York

/s/ Lidia M. Orrego

LIDIA M. ORREGO

Plaintiff-Appellant Pro Se

95-08 Queens Blvd., Apt. 3E

Rego Park, NY 11374

Telephone: (347) 453-2234

Email: orregoprose@gmail.com

**UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

-----X

LIDIA M. ORREGO,

Plaintiff-Appellant,

-against-

KEVIN KNIPFING, also known as KEVIN JAMES,

STEPHANIEANNA JAMES-KNIPFING,

also known as STEFFIANA DE LA CRUZ,

OLD WESTBURY EDDIE LLC, OLD WESTBURY LLC,

STEVE SAVITSKY, and TERESA A. ZANTUA,

Defendants-Appellees.

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Docket No. 26-899 (Lead) 26-1576

EDNY Case No. 20-cv-3361

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF-APPELLANT'S
MOTION FOR LEAVE TO FILE LIMITED
SUPPLEMENTAL EXHIBITS 2-5**

PRELIMINARY STATEMENT

Plaintiff-Appellant Lidia M. Orrego, proceeding pro se, respectfully submits this Memorandum of Law in support of her Motion for Leave to File Limited Supplemental Exhibits 2-5 in support of her pending Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026, Order, or Alternatively, for Clarification.

The requested supplementation is limited and directly connected to the procedural circumstances underlying reconsideration. Exhibits 2 and 3 document subsequent proceedings concerning the same District Court record, the November

17, 2025, recusal and random reassignment, subsequent post-recusal docket activity, the pending Rule 60/Rule 62.1 proceeding, and the related appellate proceedings. Exhibits 4 and 5 identify and organize the corresponding official court records and evidence.

The official record establishes that on November 17, 2025, Judge Sanket J. Bulsara and Magistrate Judge Anne Y. Shields recused, and the case was randomly reassigned to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.” The supplemental materials identify subsequent acts of the recused judicial officer and the record supporting Plaintiff-Appellant’s position that those acts were undertaken without jurisdiction or authority following the recusal and reassignment.

Those subsequent matters include DE [244] and DE [245], the creation and use of Miscellaneous Case No. 2:26-mc-01957-SJB, and the resulting filing restrictions. The supplemental materials further identify the official records and evidence documenting the treatment of material evidence, evidentiary omissions and mischaracterizations, false or inaccurate statements reflected in the challenged proceedings, and judicial bias documented in the record.

The same procedural history led to Plaintiff-Appellant’s June 24, 2026, Motion to Vacate under Federal Rules of Civil Procedure 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with her request for an indicative ruling under Rule 62.1. That motion was docketed as MC DE [6]. Plaintiff-Appellant thereafter notified this Court

pursuant to FRAP 12.1 and requested temporary abeyance of the consolidated appeals while the District Court addressed the Rule 60/Rule 62.1 proceeding.

Exhibit 2 is the Second Circuit Clerk's August 14, 2026, acknowledgment concerning Judicial Conduct Complaint No. 02-26-90052-jm. Exhibit 3 is the August 26, 2026, Clerk-stamped Second Judicial Misconduct Complaint concerning Judge Bulsara and the proceedings arising from EDNY Case No. 2:20-cv-03361 and related appeals. Exhibits 4 and 5 provide corresponding organizational roadmaps identifying the underlying official records and evidence.

The requested supplementation does not replace the official record. It permits the Court to receive subsequent procedural documents and efficiently locate the underlying District Court and appellate materials relevant to the pending reconsideration motion.

The supplementation will also assist the Court in reviewing the reconsideration request against the complete procedural sequence already reflected in the official record. The materials connect the November 17, 2025, recusal and reassignment, the subsequent post-recusal docket activity, the June 24, 2026, Rule 60 and Rule 62.1 proceeding, and the related FRAP 12.1 notices and abeyance request. They further identify the underlying records and evidence documenting judicial bias, material evidentiary omissions and mischaracterizations, and false or inaccurate statements reflected in the challenged proceedings, while preserving the official court records as the controlling sources.

ARGUMENT

POINT I

FRAP 27 PROVIDES THE PROCEDURAL MECHANISM FOR SEEKING EXPRESS LEAVE TO SUBMIT THE LIMITED SUPPLEMENTAL MATERIALS

Federal Rule of Appellate Procedure 27(a)(1) provides that an application for an order or other relief ordinarily must be made by motion. FRAP 27(a)(2)(A) requires a motion to state with particularity the grounds for the motion, the relief sought, and the legal argument necessary to support it. FRAP 27(a)(2)(B) permits affidavits and other papers necessary to support a motion.

Plaintiff-Appellant follows that procedure here. She does not unilaterally designate Exhibits 2–5 as part of the appellate record. Instead, she affirmatively requests permission to submit four specifically identified supplemental materials and states their limited relevance to the reconsideration proceeding.

That distinction preserves the integrity of the appellate record. Exhibits 2 and 3 document subsequent procedural developments. Exhibits 4 and 5 principally organize and identify existing official District Court and appellate records and evidence.

The requested relief therefore allows this Court to determine the permissible consideration and appropriate weight of the supplemental materials while leaving the underlying official records as the controlling sources.

POINT II

***UNITED STATES v. AULET* CONFIRMS THE SECOND CIRCUIT’S AUTHORITY TO ADDRESS SUPPLEMENTATION OF MATERIAL RELEVANT TO AN APPELLATE ISSUE**

The Second Circuit’s decision in *United States v. Aulet*, 618 F.2d 182, 186–87 (2d Cir. 1980) provides direct guidance concerning appellate supplementation.

In *Aulet*, the government supplemented the appellate record with § 3500 materials that had been provided to trial counsel but had not been introduced into evidence below. The appellant moved to strike the materials because they were not part of the trial record.

The Second Circuit explained that where something material to a claim on appeal has been omitted from the record, FRAP 10(e) permits the Court, “on proper suggestion or of its own initiative,” to direct certification and transmission of a supplemental record. The Court further determined that, even absent the government’s supplementation, it could itself invoke Rule 10(e) to require transmission of the relevant materials and resolve the appeal on the supplemented record. *United States v. Aulet*, 618 F.2d at 186–87.

Aulet is strong Second Circuit authority for the proposition that relevant supplementation is not categorically prohibited merely because material is absent from the record initially before the appellate court. The Court retains authority under Rule 10(e), in appropriate circumstances, to address supplementation when material bears upon an appellate issue.

The present application is deliberately narrower. Exhibits 2 and 3 are subsequent procedural documents; Plaintiff-Appellant does not characterize them as materials accidentally omitted from the original District Court record. She instead seeks express leave for their limited consideration in connection with reconsideration.

Exhibits 4 and 5 principally identify and organize the underlying official records and evidence. They assist the Court in locating those materials rather than replacing them.

Accordingly, Plaintiff-Appellant does not contend that *Aulet* automatically places Exhibits 2–5 within the original appellate record. *Aulet* confirms this Court’s authority to address supplementation upon a proper application; FRAP 27 provides the procedural mechanism through which Plaintiff-Appellant requests that relief.

POINT III
INTERNATIONAL BUSINESS MACHINES CORP. v. EDELSTEIN
REINFORCES THE IMPORTANCE OF THE OFFICIAL RECORD FOR
MEANINGFUL APPELLATE REVIEW

The complementary record principle appears in *International Business Machines Corp. v. Edelstein*, 526 F.2d 37, 45–46 (2d Cir. 1975).

In *IBM*, the Second Circuit addressed restrictions that interfered with the filing of papers with the District Court Clerk. The Court emphasized the importance of filing and preserving materials at the trial level because those materials form the record necessary for subsequent appellate review. It recognized that, absent

extraordinary circumstances, appellate courts ordinarily do not consider matters outside the record developed below.

That principle supports the structure of the present application.

Plaintiff-Appellant does not seek to substitute Exhibits 2–5 for the District Court record. Exhibits 4 and 5 instead direct the Court to that record. The underlying orders, docket entries, evidentiary submissions, electronic evidence, Rule 60/Rule 62.1 materials, and appellate filings remain the controlling sources.

Aulet and *IBM* therefore provide complementary Second Circuit guidance. *Aulet* confirms appellate authority to address supplementation in appropriate circumstances. *IBM* emphasizes preservation of and reliance upon the official record necessary for meaningful appellate review.

The present application respects both principles. Plaintiff-Appellant seeks the Court’s permission before submitting the supplemental materials, identifies their limited function, and preserves the official record as the controlling source.

This framework is appropriate here because the requested exhibits do not displace the record reviewed below. Instead, they document subsequent procedural developments and provide organized references to the existing record and evidence. Granting leave therefore preserves the distinction between supplemental procedural materials and the controlling judicial record while enabling the Court to review the reconsideration request with the relevant procedural history and supporting materials readily identifiable from the submitted exhibits.

POINT IV
EXHIBITS 2 AND 3 DOCUMENT SUBSEQUENT PROCEDURAL
DEVELOPMENTS DIRECTLY CONNECTED TO THE PENDING
RECONSIDERATION MOTION

Exhibit 2 is the August 14, 2026, acknowledgment issued by the Clerk of this Court concerning Judicial Conduct Complaint No. 02-26-90052-jm. It confirms the existence and filing status of that subsequent proceeding.

Exhibit 3 is the August 26, 2026, Clerk-stamped Second Judicial Misconduct Complaint concerning Judge Sanket J. Bulsara. It identifies EDNY Case No. 2:20-cv-03361 and related Second Circuit Appeals Nos. 26-899 and 26-1576 and connects the subsequent proceeding to the same underlying official records relevant to reconsideration.

Exhibit 3 identifies the November 17, 2025, Order of Recusal and Random Reassignment transferring the underlying case to District Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl “for all further proceedings.”

It then identifies subsequent activity involving DE [244], DE [245], and Miscellaneous Case No. 2:26-mc-01957-SJB.

The November 17 Order and subsequent docketed documents are not matters of personal belief. They are identifiable official court records. Exhibits 3–5 permit the Court to examine those records directly.

The supplemental materials further identify the record supporting Plaintiff-Appellant's position that the subsequent acts of the recused judicial officer were undertaken without jurisdiction or authority after the recusal and reassignment.

Exhibit 3 also identifies the official records and evidence documenting the treatment and omission of material evidence, material mischaracterizations of the evidentiary record, false or inaccurate statements reflected in the challenged post-recusal proceedings, and judicial bias documented through the identified record and evidence.

These matters are tied to specific docket entries, orders, summary-judgment submissions, documentary evidence, electronic evidence, and the subsequent Rule 60/Rule 62.1 proceeding. They are therefore capable of examination against the underlying record itself.

These materials further assist the Court by connecting the subsequent procedural developments to the precise official records underlying the reconsideration request. Their inclusion permits direct review of the recusal and reassignment, post-recusal docket activity, evidentiary record, and pending Rule 60/Rule 62.1 proceeding without requiring reliance on isolated descriptions. The Court can therefore evaluate the relevance of Exhibits 2 and 3 against the corresponding official docket entries, orders, submissions, and evidence.

POINT V
THE SUPPLEMENTAL MATERIALS ARE DIRECTLY CONNECTED TO
THE RULE 60/RULE 62.1 PROCEEDING THAT FORMED THE BASIS OF
THE REQUESTED APPELLATE ABEYANCE

The relevance of Exhibits 2–5 extends beyond the existence of subsequent judicial-conduct proceedings.

Exhibit 3 identifies Plaintiff-Appellant’s June 24, 2026, Motion to Vacate, which sought relief under Federal Rules of Civil Procedure 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with an indicative ruling pursuant to Rule 62.1.

That motion was supported by an Affirmation, Memorandum of Law, documentary exhibits, a Master Evidence Map, and electronic evidence and was docketed as MC DE [6].

Plaintiff-Appellant thereafter notified this Court of the Rule 60/Rule 62.1 proceeding under FRAP 12.1 and sought temporary abeyance of the consolidated appeals while the District Court addressed that proceeding.

The Second Circuit has long recognized the procedural relationship between a pending appeal and a Rule 60 motion.

In *Toliver v. County of Sullivan*, 957 F.2d 47, 49 (2d Cir. 1992), the Second Circuit explained that a district court may entertain and deny a Rule 60(b) motion while an appeal is pending; if the district court determines that the motion should be granted, the movant may then seek remand from the Court of Appeals. *Toliver*

expressly relied upon *Ryan v. United States Lines Co.*, 303 F.2d 430, 434 (2d Cir. 1962) for that procedure.

Rule 62.1 now expressly provides the indicative-ruling mechanism when a district court lacks authority to grant relief because an appeal is pending, while FRAP 12.1 supplies the corresponding appellate procedure.

Toliver and *Ryan* therefore reinforce the procedural significance of MC DE [6]. The pending Rule 60/Rule 62.1 proceeding was not collateral to Plaintiff-Appellant's abeyance request; it was the procedural reason for seeking temporary abeyance.

Exhibits 2–5 identify subsequent developments and underlying records bearing upon that same procedural sequence. Their consideration therefore would assist the Court in evaluating reconsideration of the August 12, 2026, Order against the procedural record that prompted the original abeyance request.

The supplemental materials demonstrate why the unresolved District Court proceeding remained procedurally significant when the August 12 Order was entered. The Rule 60/Rule 62.1 request presented matters capable of affecting the pending appeals, while FRAP 12.1 provided the mechanism for notifying this Court of an indicative ruling. Permitting Exhibits 2–5 therefore provides subsequent procedural developments and references to the underlying record necessary to assess reconsideration within the continuing relationship between the District Court and appellate proceedings.

POINT VI
EXHIBITS 4 AND 5 PROVIDE ORGANIZATIONAL ROADMAPS TO THE
OFFICIAL RECORD AND EVIDENCE

Exhibit 4 is the Exhibit Index and Official Court Records Incorporated by Reference.

It identifies the underlying records of EDNY Case No. 2:20-cv-03361, Miscellaneous Case No. 2:26-mc-01957-SJB, and the related Second Circuit proceedings.

Among other materials, Exhibit 4 identifies the November 17, 2025, Order of Recusal and Random Reassignment; DE [244] and DE [245]; MC DE [6]; the Rule 62.1 request; and the Second Circuit filings concerning FRAP 12.1 and appellate abeyance.

It also identifies the underlying summary-judgment submissions and evidentiary materials corresponding to the matters addressed in the Motion to Vacate and Exhibit 3.

The descriptions in Exhibit 4 function as organizational roadmaps. The underlying official court records themselves control.

Exhibit 5 performs a corresponding organizational function for the evidentiary record. The Visual Map identifies and organizes the documentary and electronic evidence addressed in the Motion to Vacate and directs the reviewer to the corresponding underlying materials.

The Visual Map is particularly useful because the matters documented in Exhibits 3–5—including the post-recusal proceedings, treatment and omission of material evidence, evidentiary mischaracterizations, false or inaccurate statements reflected in the challenged proceedings, and documented judicial bias—are tied to an extensive underlying record.

Exhibit 5 enables those matters to be traced to the corresponding evidence rather than considered in isolation. It does not replace that evidence. The underlying official records and evidentiary submissions remain controlling.

That structure is consistent with the record-preservation principles articulated in *International Business Machines Corp. v. Edelstein*, 526 F.2d 37, 45–46 (2d Cir. 1975) because the supplemental organizational materials direct the Court back to the official record rather than substitute for it.

Together, Exhibits 4 and 5 provide a structured means for the Court to locate the specific records supporting the matters presented in Exhibits 2 and 3 without altering the underlying record. This organization is particularly important where the relevant materials span the District Court action, miscellaneous proceeding, appellate proceedings, documentary submissions, and electronic evidence. By identifying the corresponding sources, the exhibits permit efficient comparison of the challenged statements and treatment of evidence with the actual materials filed, while maintaining the official docket entries, orders, submissions, and evidence as controlling sources.

POINT VII
THE OFFICIAL RECORD IDENTIFIED IN EXHIBITS 3–5 IS MATERIAL
TO THE POST-RECUSAL PROCEDURAL HISTORY PRESENTED IN
RECONSIDERATION

The November 17, 2025, recusal and random reassignment is documented by an official District Court order.

The subsequent activity reflected in DE [244] and DE [245] is documented by official docketed materials.

The June 24, 2026, Motion to Vacate and Rule 62.1 request is documented by MC DE [6].

The notices provided to this Court and the requested appellate abeyance are documented in this Court’s own record.

Exhibits 3–5 connect those procedural records with the underlying evidentiary record concerning the challenged post-recusal proceedings.

The record identified therein documents the evidence submitted before the challenged rulings and permits comparison between that evidence and its treatment in the resulting decisions. It further identifies false or inaccurate statements reflected in the challenged record and the evidence documenting judicial bias.

Those matters are relevant to the Rule 60/Rule 62.1 proceeding and therefore to the procedural reason Plaintiff-Appellant sought temporary abeyance.

The jurisdictional consequence of the November 17 recusal and reassignment is likewise directly implicated by MC DE [6]. The official record establishes the

recusal and reassignment “for all further proceedings,” while Exhibits 3–5 identify the subsequent acts and the record supporting Plaintiff-Appellant’s position that those acts were undertaken without jurisdiction or authority.

Accordingly, the requested supplementation provides the Court with a concise means of identifying the subsequent procedural developments and the official records bearing upon the reconsideration request.

POINT VIII
ACCEPTANCE OF THE FOUR LIMITED SUPPLEMENTAL EXHIBITS
WOULD ASSIST THE COURT WITHOUT REPLACING OR ALTERING
THE OFFICIAL RECORD

The requested supplementation consists of only four specifically identified exhibits.

Exhibits 2 and 3 document subsequent procedural developments.

Exhibits 4 and 5 provide organizational roadmaps to the corresponding official records and evidence.

The request does not alter the relief sought in the pending reconsideration motion. Nor does it ask the Court to substitute an exhibit description, index, or demonstrative for an official court document.

The District Court and appellate records remain controlling.

This limited structure is consistent with FRAP 27, respects the record principles articulated in *International Business Machines Corp. v. Edelstein*, 526 F.2d 37, 45–46 (2d Cir. 1975), and seeks express permission from the Court before invoking

the supplementation principles recognized in *United States v. Aulet*, 618 F.2d 182, 186–87 (2d Cir. 1980).

It is also directly connected to the established Second Circuit procedure reflected in *Toliver v. County of Sullivan*, 957 F.2d 47, 49 (2d Cir. 1992) and *Ryan v. United States Lines Co.*, 303 F.2d 430, 434 (2d Cir. 1962) governing Rule 60 proceedings while an appeal is pending.

The Court retains authority to determine the permissible consideration and appropriate weight of each supplemental exhibit while relying upon the underlying official records for the facts documented therein.

CONCLUSION

For the foregoing reasons, Plaintiff-Appellant respectfully requests that the Court grant her **Motion for Leave to File Limited Supplemental Exhibits 2–5 in Support of Motion for Panel Reconsideration and Reconsideration En Banc of the August 12, 2026 Order, or Alternatively, for Clarification**, accept Supplemental Exhibits 2–5 for the limited purposes stated herein, consider the official records and evidence identified therein in connection with the pending reconsideration motion, and grant such other and further relief as the Court deems just and appropriate.

Respectfully Submitted

Dated: August 26, 2026
Rego Park, New York

/s/ Lidia M. Orrego

LIDIA M. ORREGO

Plaintiff-Appellant Pro Se
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Rego Park, NY 11374
Telephone: (347) 453-2234
Email: orregoprose@gmail.com

Pro Se Certificate of Compliance with

Word or Page Limits Adapted from Federal Rules of Appellate Procedure Form 6

A document filed with the Court must not be longer than the Federal Rules of Appellate Procedure or the Court's Local Rules permit. Check the box for the document you are filing and state the number of words or pages.

- ☐ **Brief** contains _____ words. [14,000 word limit - LR 32.1(a)(4)(A)], or
Brief contains _____ pages. [30 page limit - FRAP 32(a)(7)(A)]
- ☐ **Reply Brief** contains _____ words. [7,000 word limit - LR 32.1(a)(4)(B)], or
Reply Brief contains _____ pages. [30 page limit - FRAP 32(a)(7)(A)]
- ☐ **Writ of Mandamus/Prohibition** contains _____ words. [7,800 word limit - FRAP 21(d)(1)], or
Writ of Mandamus/prohibition contains _____ pages. [30 page limit - FRAP 21(d)(2)]
- ☒ **Motion or Response to the Motion** contains 4,742 words. [5,200 word limit - FRAP 27(d)(2)(A)], or
Motion or Response to the Motion contains _____ pages. [20 page limit - FRAP 27(d)(2)(B)]
- ☐ **Reply to the Motion** contains _____ words. [2,600 word limit - FRAP 27(d)(2)(C)], or
Reply to the Motion contains _____ pages. [10 page limit - FRAP 27(d)(2)(D)]
- ☐ **Petition for Panel or En Banc Hearing** contains _____ words. [3,900 word limit - FRAP 35(b)(2)(A)], or
Petition for Panel or En Banc Hearing contains _____ pages. [15 page limit - FRAP 35(b)(2)(B)]
- ☐ **Petition for Panel Rehearing** contains _____ words. [3,900 word limit - FRAP 40 (b)(1)], or
Petition for Panel Rehearing contains _____ pages. [15 page limit - FRAP 40 (b)(2)]

EXHIBIT 2

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

EXHIBIT 3

Case: 26-899, 08/27/2026, DktEntry: 34.5, (2 of 8)
Complaint of Judicial Misconduct Related to Pending Judicial Conduct
Complaint Nos. 02-25-90131-jm and 02-25-90132-jm

AO 310 (Rev. 03/16)

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

IN 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.)

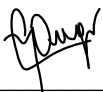
31. I respectfully request an independent investigation under 28 U.S.C. §§ 351–364 and review of the complete documentary record rather than the factual narrative in DE [244]. This Statement is accompanied by Exhibits 1–12, including the corrected Master Evidence Map, representative documentary evidence, 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 4

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**.

EXHIBIT 5

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)