

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: **Hold Appeals in Abeyance Pending District Court
Disposition of Plaintiff-Appellant's Rule 60 Motion and
Request for an Indicative Ruling Pursuant to Fed. R.
Civ. P. 62.1**

Set forth below precise, complete statement of relief sought: Plaintiff-Appellant respectfully requests an Order holding Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending disposition by the United States District Court for the Eastern District of New York of Plaintiff-Appellant's pending Motion for Relief from Judgment pursuant to Fed. R. Civ. P. 60(b)(3), 60(b)(4), 60(b)(6), 60(d)(3), and request for an indicative ruling pursuant to Fed. R. Civ. P. 62.1. The District Court's disposition may materially affect the issues presented on appeal, and an abeyance will promote judicial economy and avoid duplicative proceedings.

MOVING PARTY: Lidia M. Orrego☐ Plaintiff☐ Defendant☒ Appellant/Petitioner☐ Appellee/Respondent

OPPOSING 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) 453-2234Email: orregoprose@gmail.comOPPOSING ATTORNEY: Gordon Rees Scully Mansukhani LLPAddress : One Battery Park Plaza, 28th Floor

New York, NY 10004

Phone: (212) 269-5500Email: kminnahdonkoh@grsm.comCourt- 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 Certificateof Service. Proof email.

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS 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: 07/23/2026Service : ☒ Electronic ☐ Other [Attach proof of service]



Lidia Orrego <liorrego@gmail.com>

Motion to Hold Appeals Nos. 26-899 (Lead) and 26-1576 in Abeyance

1 message

Lidia Orrego <liorrego@gmail.com>

Thu, Jul 23, 2026 at 9:05 PM

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

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

GRSM Counsel,

Please find attached for filing Plaintiff-Appellant's Motion to Hold Appeals Nos. 26-899 (Lead) and 26-1576 in Abeyance pending the disposition of the Rule 60 Motion and request for an indicative ruling currently pending before the United States District Court for the Eastern District of New York.

The filing includes:

- T-1080 Motion Information Statement
- Affirmation
- Memorandum of Law
- Certificate of Compliance
- Appendix
- Certificate of Service

Thank you for your attention to this filing.

Respectfully submitted,

Lidia M. Orrego
Plaintiff Pro Se

95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
(347) 453-2234
liorrego@gmail.com
lidia.orrego@justiceforlidia.nyc
orregoprose@gmail.com

11 attachments

-  **4_TABLE OF EXHIBITS.pdf**
102K
-  **2_Affirmation_LMO_07-23-2026.pdf**
196K
-  **3_MOL_07-23-2027.pdf**
315K
-  **1_T-1080 Motion_07-23-2026.pdf**
507K
-  **7_Exhibit 3 - Docket 07-22-2026 Docket 2_26-mc-01957-SJB.pdf**
147K

-  **6_Exhibit 2 - DE [5]_Dated 06-23-2026_Letter_Chief_Judge.pdf**
944K
-  **11_Certificado of Service.pdf**
309K
-  **9_Exhibit 5 - Dkt 26-899 DKT 1 Notice of Appeal.pdf**
932K
-  **5_Exhibit 1 - DE [6]_Dated 06-24-2026_Notice_of_Motion.pdf**
5619K
-  **10_Exhibit 6 - Dkt 26-1596 Dkt 1 Notice of Appeal.pdf**
1189K
-  **8_Exhibit 4 - Dkt_15_ Dated 07-04-2026 Letter Notice Motion FRAP_Notice_Judge_Chen_Chief_Judge_Brodie_Package.pdf**
7933K

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

-----X
LIDIA M. ORREGO,

Plaintiff-Appellant,
-against-

Docket No. 26-899 (Lead) 26-1576
EDNY Case No. 20-cv-3361

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
**AFFIRMATION OF LIDIA M. ORREGO IN SUPPORT OF MOTION TO HOLD
APPEALS NOS. 26-899 (LEAD) AND 26-1576 IN ABEYANCE**

I, Lidia M. Orrego, affirm under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

I. IDENTITY OF THE AFFIANT AND PURPOSE OF THIS MOTION

1. I am the Plaintiff-Appellant in the above-captioned appeals and respectfully submit this Affirmation in support of my Motion requesting that Appeals Nos. 26-899 (Lead) and 26-1576 be held in abeyance pending the disposition by the United States District Court for the Eastern District of New York of my pending Motion for Relief from Judgment pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3) of the Federal Rules of Civil Procedure, together with my request for an indicative ruling pursuant to Federal Rule of Civil Procedure 62.1. See annexed Exhibit 1.

2. I make this Affirmation based upon my personal knowledge of the facts set forth herein, my participation in the proceedings before the United States District Court for the Eastern District of New York, my review of the District Court and appellate dockets, and the records maintained in those proceedings.

3. The purpose of this Motion is limited. Through this application, I do not ask this Court to determine the merits of my pending Rule 60 Motion or to resolve the factual or legal issues

presented therein. Rather, I respectfully request that this Court temporarily hold these appeals in abeyance while the District Court considers my pending Rule 60 Motion and request for an indicative ruling.

4. I respectfully submit this procedural request because my Rule 60 Motion remains pending before the District Court while Appeals Nos. 26-899 and 26-1576 remain pending before this Court. As a result, proceedings concerning the same final judgment are simultaneously pending before both courts. See annexed Exhibits 1, 3, 4, 5, and 6.

5. I respectfully submit that temporarily holding these appeals in abeyance will allow the District Court to complete its consideration of the pending Rule 60 Motion and request for an indicative ruling before further proceedings occur in these appeals. I seek only to preserve the orderly procedural relationship between the District Court and this Court while those post-purported-judgment proceedings remain pending.

6. Attached hereto are true and correct copies of selected portions of the District Court and appellate records relevant to this procedural motion. Only those documents necessary to establish the procedural posture of the pending Rule 60 Motion, the request for an indicative ruling, the related miscellaneous proceedings, and the pending appeals are included in the Appendix. The complete filings remain part of the official records of the District Court and this Court.

7. The exhibits annexed to this Motion are submitted solely to establish the procedural history relevant to the present request for an abeyance and are not intended to require this Court to resolve the merits of the pending Rule 60 Motion in connection with this procedural application.

8. The following exhibits are attached to this Motion:

a. **Exhibit 1:** Selected portions of Plaintiff-Appellant's Motion for Relief from Judgment pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with the request for an indicative ruling pursuant to Rule 62.1.

b. **Exhibit 2:** Selected filings from Miscellaneous Case No. 2:26-mc-01957-SJB, including Plaintiff-Appellant's filing at ECF No. 5 (Case 2:26-mc-01957-SJB, Document 5, filed June 24, 2026), the Notice to the Clerk of Court, the correspondence to Chief United States District Judge Margo K. Brodie, and related submissions. These documents reflect Plaintiff-Appellant's post-purported-judgment filings concerning Civil Action No. 20-cv-03361-SJB-AYS following the May 8, 2026, Memorandum and Order. United States District Court Docket, Miscellaneous Case No. 2:26-mc-01957-SJB, including selected docket entries reflecting the opening and same-day closure of the miscellaneous case, together with Plaintiff-Appellant's letters, notices, and motions, including the pending Rule 60 Motion and Rule 62.1 request, which Plaintiff-Appellant contends were diverted from the underlying civil action and remain unresolved.

c. **Exhibit 3:** Docket Miscellaneous Case No. 2:26-mc-01957-SJB reflecting the filing of the Rule 60 Motion and related submissions. The docket reflects, among other things, the filing of the Rule 60 Motion on June 24, 2026, supervisory notices, notices to the Clerk of Court, and related correspondence following the purported May 8, 2026, Memorandum and Order DE 244.

d. **Exhibit 4:** Plaintiff-Appellant's Notice filed pursuant to Federal Rule of Appellate Procedure 12.1, notifying this Court that post-purported-judgment proceedings were pending before the District Court. The complete Notice includes the Notice to the Clerk of Court, the letter to Chief Judge Margo K. Brodie, and the letter to United States District Judge Pamela K. Chen.

e. **Exhibit 5:** Notice of Appeal in Appeal No. 26-899, this exhibit establishes the timely invocation of the Court of Appeals' jurisdiction over the underlying proceedings. It identifies the order appealed from, confirms the pendency of the lead appeal before this Court, and provides the procedural basis demonstrating that appellate jurisdiction had attached before Plaintiff-Appellant filed the pending Rule 60 Motion and requested an indicative ruling pursuant to Rule 62.1.

f. **Exhibit 6:** Notice of Appeal in Appeal No. 26-1576, this exhibit establishes the timely filing of the second appeal arising from the May 8, 2026, Memorandum and Order and Final Judgment. Together with Exhibit 5, it demonstrates that both pending appeals are the subject of Plaintiff-Appellant's request for a temporary abeyance pending the District Court's disposition of the Rule 60 Motion and request for an indicative ruling under Rule 62.1.

II. PROCEDURAL HISTORY OF THE DISTRICT COURT PROCEEDINGS

9. The underlying action was commenced in the United States District Court for the Eastern District of New York and assigned Civil Action No. 2:20-cv-03361-SJB-AYS.

10. During the course of the litigation, I actively participated in the proceedings as a self-represented litigant. Throughout the case, I filed pleadings, motions, memoranda of law, declarations, documentary evidence, and other submissions in support of my claims and in opposition to motions filed by Defendants.

11. As the litigation progressed, the case was assigned to multiple judicial officers. The proceedings included matters before United States Magistrate Judge Anne Y. Shields and United States Magistrate Judge Sanket J. Bulsara.

12. On November 5, 2025, a Notice of Recusal was entered concerning Magistrate Judge Anne Y. Shields and Magistrate Judge Sanket J. Bulsara. Thereafter, on November 17, 2025, the case was reassigned to United States District Judge Pamela K. Chen and United States Magistrate Judge Taryn A. Merkl. True and correct copies of the relevant docket entries are annexed as Exhibit 2.

13. Following the reassignment, proceedings continued in the District Court. During that period, I continued filing submissions that I believed were relevant to the pending motions and the factual record before the Court proving fraud upon the Court, including Judicial Findings. See annexed Exhibit 2.

14. On or about May 8, 2026, the District Court entered a Memorandum and Order together with a Purported Final Judgment disposing of the underlying action by a recused judge. See annexed Exhibit 2.

15. The Purported DE 244 - Memorandum and Order also directed the Clerk of Court to open a miscellaneous case entitled In re Orrego, to place future filings under that miscellaneous docket, and to administratively close that matter following its creation. The Order further stated that future filings, other than those related to an appeal, were to be submitted under the miscellaneous docket for review. See annexed Exhibit 4.

16. Consistent with that directive, Miscellaneous Case No. 2:26-mc-01957-SJB was opened on May 8, 2026. The docket identifies that miscellaneous proceeding as related to Civil Action No. 2:20-cv-03361-SJB-AYS. See annexed Exhibit 4.

17. Following entry of the May 8, 2026, Purported Act Memorandum and Order and Judgment, I timely pursued appellate review by filing Notices of Appeal. Those Notices resulted in Appeal No. 26-899, which is the lead appeal presently pending before this Court, and Appeal No. 26-1576, which is also pending before this Court. True and correct copies of the Notices of Appeal are annexed as Exhibits 5 and 6.

18. Since the entry of purported judgment DE 244 and DE 245, I have continued to pursue only those procedural remedies available under the Federal Rules and through the appellate process. My post-purported judgment filings have included notices, applications, and motions directed to the District Court and to this Court in accordance with the procedural posture of the case. See annexed Exhibits 1, 3, 4, 5, 6, and 7.

19. The procedural history summarized above provides the context for the present Motion. My request that these appeals be held in abeyance arises solely because post-purported judgment DE

244 and DE 245 proceedings remain pending before the District Court while these consolidated appeals remain pending before this Court.

III. PLAINTIFF-APPELLANT'S RULE 60 MOTION AND REQUEST FOR AN INDICATIVE RULING

20. Following the entry of the May 8, 2026, Purported Memorandum and Order DE 244 and Purported DE 245 Final Judgment by recused judge without jurisdiction, and while Appeals Nos. 26-899 (Lead) and 26-1576 were pending before this Court, I prepared and filed a Motion for Relief from Judgment in the United States District Court for the Eastern District of New York based on no jurisdiction and fraud upon the Court among others. A true and correct copy of the Notice of Motion and selected portions of that Motion are annexed collectively as Exhibit 1.

21. The Motion seeks relief pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3) of the Federal Rules of Civil Procedure. In addition to requesting relief from the May 8, 2026, Purported Memorandum and Order and Judgment, I expressly requested that the District Court issue an indicative ruling pursuant to Federal Rule of Civil Procedure 62.1. See annexed Exhibit 1.

22. In my Rule 60 Motion, I requested that the District Court determine whether it would grant the requested relief if the matter were remanded by this Court or, alternatively, whether the Motion raises a substantial issue appropriate for consideration under the indicative ruling procedure. See annexed Exhibit 1.

23. My Rule 60 Motion is supported by documentary exhibits, selected portions of the District Court record, and comparative analyses that I submitted in support of the relief requested. Those materials were filed together with the Motion and remain part of the record before the District Court. See annexed Exhibit 1.

24. Among the supporting materials included with my Rule 60 Motion are documentary exhibits addressing the procedural history of the case, selected portions of the summary judgment record, and comparative analyses identifying matters that I contend are relevant to the District

Court's consideration of the Motion. Those materials remain pending before the District Court and have not yet been ruled upon. See annexed Exhibit 1.

25. My Rule 60 Motion also requests that the District Court consider the Motion under the procedure applicable to post-purported-judgment motions filed while an appeal is pending. Accordingly, the Motion requests that the District Court first determine whether it would grant relief upon remand or whether the Motion raises a substantial issue requiring further proceedings. See Exhibit 1.

26. I filed the Rule 60 Motion because Appeals Nos. 26-899 and 26-1576 were already pending before this Court, and I sought to present the post-purported-judgment issues to the District Court through the procedure available while the appeals remain pending. See annexed Exhibit 1.

27. The Rule 60 Motion remains pending before the District Court. To date, the District Court has not issued an order granting or denying the Motion, nor has it issued an indicative ruling concerning the relief requested. See annexed Exhibits 1 and 3.

28. Because the Rule 60 Motion remains pending, the procedural issues presented therein have not yet been resolved by the District Court. Accordingly, no determination has yet been made concerning the request for an indicative ruling or the issues presented in the Motion. See annexed Exhibits 1 and 3.

29. The present Motion requesting that these appeals be held in abeyance is based upon the existence of those pending District Court proceedings. I respectfully seek only to allow the District Court to complete its consideration of the pending Rule 60 Motion before these appeals proceed further.

30. I respectfully submit that the procedural posture reflected by the District Court docket and the pending Rule 60 Motion provides the factual basis for my request that Appeals Nos. 26-899

(Lead) and 26-1576 be temporarily held in abeyance until the District Court has acted upon the pending Motion and request for an indicative ruling. See annexed Exhibits 1 and 3.

IV. PROCEEDINGS IN MISCELLANEOUS CASE NO. 2:26-MC-01957-SJB

31. As directed by the May 8, 2026, Purported Memorandum and Order DE 244, the Clerk of Court opened Miscellaneous Case No. 2:26-mc-01957-SJB, entitled **In re Orrego, without notice, jurisdiction, hearing, or evidence and based on fraud proved by the documentary evidence**. The docket identifies that proceeding as related to Civil Action No. 2:20-cv-03361-SJB-AYS. See annexed Exhibit 4.

32. The Miscellaneous Case docket reflects that it was created on May 8, 2026, following entry of the Memorandum and Order in the underlying civil action. According to the docket, future filings concerning the underlying action were to be filed in the miscellaneous proceeding in accordance with the directions contained in the May 8, 2026, Purported Act. See Exhibit 4.

33. Consistent with that procedural direction, I continued to submit post-purported-judgment filings relating to the underlying action through the miscellaneous case. Those filings were accepted for docketing and became part of the official District Court record. See Exhibit 4.

34. On June 24, 2026, my Rule 60 Motion and request for an indicative ruling were docketed in the miscellaneous proceeding instead of the case 20cv3361, reassigned to District Judge Pamela Chen. The docket reflects that the filing included my Notice of Motion, a Notice to the Clerk of Court, and supporting exhibits. See annexed Exhibit 4.

35. The Purported Miscellaneous Case docket further reflects the filing of an Administrative Supervisory Notice concerning Emergency Motions to Reopen, together with related correspondence submitted in connection with those proceedings. See annexed Exhibit 4.

36. The docket also reflects my filing of a Notice to the Clerk of Court concerning the pending post-purported-judgment proceedings. See annexed Exhibit 4.

37. In addition, the docket reflects the filing of a Notice of Potential Amicus Curiae Participation in connection with the pending proceedings. See annexed Exhibit 4.

38. The purported docket further reflects filings relating to Applications for Leave to File Motions to Reopen and Notices of Motion to Reopen in related civil actions. Those filings were docketed as separate entries within the miscellaneous proceeding. See annexed Exhibit 4.

39. The Purported Miscellaneous Case docket also reflects that copies of certain filings were submitted for the attention of United States Magistrate Judge Taryn A. Merkl, Chief Judge Margo K. Brodie, and United States District Judge Pamela K. Chen. See annexed Exhibit 4.

40. Thereafter, I submitted corrected applications for extensions of time to file petitions for writs of certiorari. Those filings also appear on the Purported Miscellaneous Case docket. See annexed Exhibit 4.

41. The Purported Miscellaneous Case docket demonstrates that my Rule 60 Motion and related post-purported-judgment submissions remain part of the official District Court record and reflect the continuing procedural activity associated with those proceedings. See Exhibit 4.

42. As of the date of this Affirmation, the District Court has not issued an indicative ruling on my pending Rule 60 Motion, and the post-purported-judgment proceedings reflected in the Miscellaneous Case docket have not resulted in a disposition of that Motion.

V. PRESENT PROCEDURAL POSTURE AND REQUEST FOR AN ABEYANCE

43. After filing my Rule 60 Motion in the District Court, I filed a Notice with this Court advising that post-purported-judgment proceedings were pending before the District Court. The Notice was filed to inform this Court that I had requested an indicative ruling in connection with my pending Rule 60 Motion. A true and correct copy of that Notice is annexed as Exhibit 4.

44. At the present time, both Appeal No. 26-899 (Lead) and Appeal No. 26-1576 remain pending before this Court. Likewise, my Motion for Relief from Judgment and request for an

indicative ruling remain pending before the United States District Court for the Eastern District of New York. See annexed Exhibits 1, 3, 4, 5, and 6.

45. As of the date of this Affirmation, the District Court has not issued an order granting or denying my Rule 60 Motion, nor has it issued an indicative ruling concerning the relief requested therein. See annexed Exhibits 1 and 3.

46. Because the Rule 60 Motion remains pending before the District Court while these appeals remain pending before this Court, proceedings concerning the same final purported judgment are currently pending simultaneously before both courts.

47. My present Motion does not request that this Court determine the merits of the pending Rule 60 Motion or resolve any of the factual or legal issues presented therein. Those issues remain before the District Court for its consideration in the first instance.

48. Instead, I respectfully request only that these appeals be temporarily held in abeyance until the District Court has completed its consideration of the pending Rule 60 Motion and request for an indicative ruling. If the District Court issues an indicative ruling, I will promptly notify this Court and seek whatever additional procedural relief may then be appropriate. If the District Court denies the Rule 60 Motion, these appeals may proceed in the ordinary course.

49. I respectfully submit that the procedural history reflected by the District Court docket, the Purported Miscellaneous Case docket, and the appellate docket establishes that the requested abeyance concerns only the orderly management of the pending proceedings and does not require this Court to determine the merits of the Rule 60 Motion. See annexed Exhibits 1 through 6.

50. I respectfully request that this Court enter an Order holding Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending the District Court's disposition of my Motion for Relief from Judgment and request for an indicative ruling.

51. I make this Affirmation in good faith and for the purpose of supporting the procedural relief requested in the accompanying Motion.

CONCLUSION

WHEREFORE, I respectfully request that the Court hold Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending the District Court's disposition of my pending Motion for Relief from Purported Judgment pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with my request for an indicative ruling pursuant to Rule 62.1 and grant such other and further relief as the Court deems just and proper.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 28 USC §1746.

Dated: July 23, 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,

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

-against-

EDNY Case No. 20-cv-3361

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
**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF-APPELLANT'S MOTION
TO HOLD APPEALS NOS. 26-899 (LEAD) AND 26-1576 IN ABEYANCE PENDING
THE DISTRICT COURT'S DISPOSITION OF THE PENDING RULE 60 MOTION AND
REQUEST FOR AN INDICATIVE RULING**

I. PRELIMINARY STATEMENT

Plaintiff-Appellant Lidia M. Orrego respectfully submits this Memorandum of Law in support of her Motion to hold Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending the Eastern District of New York's disposition of her pending Motion for Relief from Purported Judgment under Rules 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.

This Motion presents a narrow procedural issue. Plaintiff-Appellant does not ask this Court to decide the merits of the pending Rule 60 Motion or the factual allegations it contains. Those matters remain for the District Court under the Federal Rules of Civil and Appellate Procedure.

Instead, Plaintiff-Appellant requests only that this Court temporarily suspend these consolidated appeals until Reassigned Judge Pamela K. Chen has had the opportunity to consider the pending Rule 60 Motion and determine whether she would grant the requested relief, or whether the Motion raises a substantial issue under Rule 62.1.

The requested relief promotes orderly administration of justice by permitting the District Court to address the pending Motion before this Court proceeds with appellate review. Should the District Court indicate it would grant the Motion, or that it raises a substantial issue, Rule 62.1 and Fed. R. App. P. 12.1 supply the mechanism for further proceedings here. Should the District Court deny the Motion, these appeals may proceed with a complete record.

Accordingly, Plaintiff-Appellant respectfully requests that this Court exercise its inherent authority to manage its docket and temporarily hold Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending the District Court's disposition of the pending Rule 60 Motion and request for an indicative ruling.

II. AUTHORITIES SUPPORTING THIS MOTION

The authorities below establish the procedural framework governing this Motion and demonstrate that a temporary abeyance is appropriate while the District Court considers the pending Rule 60 Motion.

Authority	Relevance to this Motion
Fed. R. Civ. P. 60(b)(3), (4), (6), and 60(d)(3)	Authorize the pending Motion for Relief from Purported judgment presently before the District Court.
Fed. R. Civ. P. 62.1	Authorizes the District Court to issue an indicative ruling while an appeal is pending. Plaintiff-Appellant expressly requested such relief in the pending Rule 60 Motion.
Fed. R. App. P. 12.1	Governs the procedure following an indicative ruling and authorizes appropriate action by the Court of Appeals after notification from the District Court.
Griggs v. Provident Consumer Discount Co., 459 U.S. 56 (1982)	Explains the jurisdictional relationship between the District Court and the Court of Appeals after a notice of appeal has been filed and provides the procedural framework addressed by Rules 62.1 and 12.1.

Authority	Relevance to this Motion
Standard Oil Co. of California v. United States, 429 U.S. 17 (1976)	Recognizes that Rule 60 relief may be sought after an appeal has been taken and that the District Court should consider such relief in the first instance.
Toliver v. County of Sullivan, 957 F.2d 47 (2d Cir. 1992)	Addresses the interaction between Rule 60 proceedings and pending appeals within the Second Circuit.
Landis v. North American Co., 299 U.S. 248 (1936)	Recognizes the inherent authority of federal courts to control their dockets and temporarily suspend proceedings in the interest of judicial economy and orderly case management.

Collectively, these authorities confirm that the Federal Rules provide a structured procedure for Rule 60 motions filed during a pending appeal, and recognize the Court's authority to manage its docket in a manner that **avoids unnecessary duplication of proceedings, and preserves the orderly relationship between the district court and the Court of Appeals.**

III. STATEMENT OF RELEVANT PROCEDURAL HISTORY

Plaintiff-Appellant commenced the underlying action in the Eastern District of New York under Civil Action No. 2:20-cv-03361-SJB-AYS. A Purported Memorandum and Order and Final Purported Judgment, DE 244 and DE 245, were entered on May 8, 2026 by a recused judge, purporting to dispose of the action.

Plaintiff-Appellant timely filed Notices of Appeal from those purported acts, resulting in Appeal No. 26-899 (Lead) and Appeal No. 26-1576, both pending before this Court.

After filing the notices of appeal, Plaintiff-Appellant filed a Motion for Relief from Purported Judgment under Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), and, because the appeals were already pending, simultaneously requested an indicative ruling under Rule 62.1.

The Rule 60 Motion remains pending. The District Court has not yet ruled on it, nor determined whether it would grant relief upon remand or whether the Motion raises a substantial issue under Rule 62.1.

Plaintiff-Appellant thereafter filed a Notice under Fed. R. App. P. 12.1 informing this Court that post-judgment proceedings were pending below and that an indicative ruling had been requested.

Accordingly, two appeals remain pending here while the Rule 60 Motion and indicative-ruling request remain pending below. This Motion seeks only a temporary abeyance to permit the District Court to complete the Rule 62.1 process before these appeals proceed further.

The requested relief does not ask this Court to decide the merits of the Rule 60 Motion, but only to preserve the orderly relationship between the two courts while those proceedings are resolved.

IV. THE FEDERAL RULES EXPRESSLY CONTEMPLATE DISTRICT COURT CONSIDERATION OF A RULE 60 MOTION WHILE AN APPEAL IS PENDING

The relief requested is fully consistent with the Federal Rules of Civil and Appellate Procedure and the established relationship between district courts and courts of appeals during post-judgment proceedings.

As set forth above, because Appeals Nos. 26-899 and 26-1576 were already pending when the Rule 60 Motion was filed, Plaintiff-Appellant simultaneously requested an indicative ruling under Rule 62.1.

Rule 62.1 addresses circumstances where a district court lacks authority to grant relief because an appeal is pending, establishing an orderly procedure through which the district court may:

1. defer consideration of the motion; 2. deny the motion; 3. state that it would grant the motion if the Court of Appeals remands for that purpose; or 4. state that the motion raises a substantial issue.

Fed. R. Civ. P. 62.1(a).

Fed. R. App. P. 12.1 complements Rule 62.1 by establishing the corresponding procedure here. When the district court issues an indicative ruling stating that it would grant the motion or that the motion raises a substantial issue, the movant must promptly notify the circuit clerk. The Court of Appeals may then remand for further proceedings while retaining jurisdiction unless it expressly dismisses the appeal. Fed. R. App. P. 12.1.

The Supreme Court has long recognized the jurisdictional relationship between district and appellate courts after a notice of appeal is filed. In **Griggs v. Provident Consumer Discount Co.**, **459 U.S. 56 (1982)**, the Court explained that a notice of appeal generally transfers jurisdiction over the matters on appeal to the court of appeals. Rules 62.1 and 12.1 allow the district court to nevertheless consider a Rule 60 motion without disturbing that framework.

Similarly, in **Standard Oil Co. of California v. United States**, **429 U.S. 17 (1976)**, the Supreme Court recognized Rule 60 as an appropriate mechanism for seeking post-judgment relief after an appeal has been filed, with the district court as the proper tribunal to evaluate such a motion in the first instance.

The Second Circuit has likewise recognized this interaction. In **Toliver v. County of Sullivan**, **957 F.2d 47 (2d Cir. 1992)**, the Court acknowledged that post-purported-judgment motions under Rule 60 may proceed while an appeal is pending through the procedures established by the Federal Rules.

Plaintiff-Appellant's request follows precisely that framework: she has not asked the District Court to disregard the pending appeals or exercise authority inconsistent with this Court's jurisdiction, but instead expressly requested an indicative ruling under Rule 62.1 and thereafter notified this Court pursuant to Rule 12.1 that such proceedings were pending before the District Court.

Accordingly, this request does not seek extraordinary relief; it seeks only to preserve the orderly operation of Rules 60, 62.1, and 12.1 while the District Court determines, in the first instance, whether the pending Motion warrants further proceedings.

Temporary abeyance here respects the jurisdiction of both courts and avoids unnecessary duplication of judicial effort, advancing rather than disrupting the orderly administration of justice.

V. HOLDING THESE APPEALS IN ABEYANCE WILL PROMOTE JUDICIAL ECONOMY, PRESERVE JUDICIAL RESOURCES, AND PREVENT POTENTIALLY UNNECESSARY APPELLATE PROCEEDINGS

A temporary abeyance is the most efficient and orderly course while the District Court considers the pending Rule 60 Motion and indicative-ruling request.

The pending Rule 60 Motion seeks relief that could materially affect the proceedings before this Court. If the District Court concludes it would grant the Motion, or that it raises a substantial issue, further proceedings below may become appropriate following action by this Court under Rule 12.1.

Proceeding with these appeals before completion of the Rule 62.1 process may require the parties and this Court to devote resources to issues later affected by the District Court's determination. By contrast, a temporary abeyance would permit the District Court to complete the procedure expressly contemplated by Rules 62.1 and 12.1 before additional appellate resources are expended.

Federal courts possess inherent authority to control the disposition of cases on their dockets to promote efficiency and the orderly administration of justice. *Landis v. North American Co.*, 299 U.S. 248, 254 (1936). That authority includes discretion to temporarily suspend proceedings when doing so serves the interests of justice and conserves judicial resources.

Those considerations are present here.

Plaintiff-Appellant does not seek an indefinite stay, but only a temporary abeyance until the District Court completes its consideration of the pending Motion, narrowly tailored and limited in duration.

Nor will a temporary abeyance prejudice Defendants-Appellees. It will not alter the purported judgment on appeal or any party's rights; it simply preserves the existing posture while the District Court determines whether the Motion warrants further proceedings under Rule 62.1.

Conversely, denying the abeyance could result in simultaneous, parallel proceedings in both courts, risking duplication of judicial effort and requiring supplemental filings depending on the District Court's disposition of the Motion.

A temporary abeyance avoids those concerns, allowing the District Court to complete the Rule 62.1/12.1 process and preserving the orderly relationship between the courts without prejudicing any party.

The Court should therefore exercise its inherent authority to hold Appeals Nos. 26-899 (Lead) and 26-1576 in abeyance pending the District Court's disposition of the Rule 60 Motion and indicative-ruling request.

VI. A TEMPORARY ABEYANCE IS THE MOST APPROPRIATE PROCEDURAL REMEDY UNDER THE PRESENT CIRCUMSTANCES

The relief requested by Plaintiff-Appellant is narrow, procedural, and temporary. Plaintiff-Appellant does not seek reversal of the District Court's judgment through this Motion, nor does Plaintiff-Appellant request that this Court resolve the merits of the pending Rule 60 Motion. Instead, Plaintiff-Appellant seeks only to preserve the procedural framework established by the Federal Rules while the District Court considers the pending post-purported-judgment motion.

The District Court is presently in the best position to determine, in the first instance, whether Plaintiff-Appellant's Rule 60 Motion should be denied, whether it raises a substantial issue, or

whether the District Court would grant the requested relief if this Court were to remand for that purpose pursuant to Rule 62.1. That determination has not yet been made.

Until the District Court completes that process, requiring the parties to proceed simultaneously with appellate briefing and the pending Rule 60 proceedings may result in unnecessary duplication of effort by the parties and by both courts. A temporary abeyance avoids that result by allowing the orderly completion of the procedure established by Rules 62.1 and 12.1 before additional appellate proceedings occur.

Moreover, granting the requested abeyance will not prejudice Defendants-Appellees. The purported judgment presently under review remains fully effective, and no substantive rights of any party will be altered by temporarily suspending these appeals. The requested relief merely postpones further appellate proceedings until the District Court has completed its consideration of the pending Rule 60 Motion.

Conversely, if the requested abeyance is denied and the District Court subsequently issues an indicative ruling under Rule 62.1, this Court may be required to address additional procedural motions, supplemental notices, or requests for remand while the appeals are actively proceeding. Granting a temporary abeyance at this stage minimizes that possibility and promotes a more orderly and efficient resolution of the pending proceedings.

Plaintiff-Appellant has proceeded in accordance with the procedures prescribed by the Federal Rules. After filing the Rule 60 Motion, Plaintiff-Appellant requested an indicative ruling under Rule 62.1 and thereafter notified this Court pursuant to Federal Rule of Appellate Procedure 12.1 that post-purported-judgment proceedings were pending before the District Court. The present Motion is the final procedural step necessary to permit those proceedings to conclude before these appeals continue. Plaintiff-Appellant contends that Exhibit 2 demonstrates that post-purported-judgment proceedings remain pending before the District Court, including filings arising from the

May 8, 2026, Memorandum and Order. Plaintiff-Appellant further contends that resolution of those proceedings bears directly on the pending Rule 60 Motion and the requested indicative ruling under Rule 62.1.

Under these circumstances, a temporary abeyance represents the most efficient, fair, and procedurally appropriate course. It respects the jurisdiction of both courts, promotes judicial economy, conserves judicial and party resources, and preserves the orderly administration of justice while the District Court considers the pending Rule 60 Motion.

VII. CONCLUSION

For the foregoing reasons, Plaintiff-Appellant respectfully requests that this Court enter an Order:

1. Holding Appeals Nos. **26-899 (Lead)** and **26-1576** in abeyance pending the disposition by the United States District Court for the Eastern District of New York of Plaintiff-Appellant's pending Motion for Relief from Purported Judgment pursuant to Rules 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with the request for an indicative ruling pursuant to Rule 62.1;
2. Directing Plaintiff-Appellant to promptly notify this Court upon the District Court's disposition of the pending Rule 60 Motion or issuance of an indicative ruling under Rule 62.1; and
3. Granting such other and further relief as this Court deems just and proper.

Respectfully Submitted

Dated: July 23, 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

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 _____ words. [5,200 word limit - FRAP 27(d)(2)(A)], or
Motion or Response to the Motion contains 20 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 3894 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)]

**TABLE OF EXHIBITS
APPENDIX**

Exhibit	Description	Selected Pages
Exhibit 1	Plaintiff-Appellant's Motion for Relief from Judgment Pursuant to Fed. R. Civ. P. 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), Including Request for Indicative Ruling Under Fed. R. Civ. P. 62.1	Notice of Motion; Relief Requested; Rule 62.1 Request; Summary Table of Grounds (FS1-FS21); Signature Page
Exhibit 2	United States District Court Docket, Miscellaneous Case No. 2:26-mc-01957-SJB	Selected docket entries reflecting that the miscellaneous case was opened and closed on the same day, while Plaintiff-Appellant's authorized letters, notices, and motions—including the Rule 60 Motion and Rule 62.1 request—were diverted from the underlying civil action, segregated into the miscellaneous docket, and left unresolved. Plaintiff-Appellant contends that this diversion prevented those filings from becoming part of the underlying case's procedural record concerning the alleged fraud upon the court, and demonstrates an abuse of administrative authority and the improper abandonment of duly submitted filings.
Exhibit 3	United States District Court Docket, Miscellaneous Case No. 2:26-mc-01957-SJB	Complete Docket

Exhibit	Description	Selected Pages
Exhibit 4	Plaintiff-Appellant's Notice Pursuant to Federal Rule of Appellate Procedure 12.1	Complete Document Include: Notice to the Clerk of Court Letter to Chief Judge Margo K. Brodie Letter to United States District Judge Pamela K. Chen
Exhibit 5	Notice of Appeal – Appeal No. 26-899 (Lead) United States District Court Docket, Civil Action No. 2:20-cv-03361-SJB-AYS	Complete Document Selected docket entries reflecting the November 2025 recusal and reassignment, May 8, 2026, Memorandum and Order, Final Judgment, and related post-judgment proceedings
Exhibit 6	Notice of Appeal – Appeal No. 26-1576 United States District Court Docket, Civil Action No. 2:20-cv-03361-SJB-AYS	Complete Document Selected docket entries reflecting the November 2025 recusal and reassignment, May 8, 2026, Memorandum and Order, Final Judgment, and related post-judgment proceedings

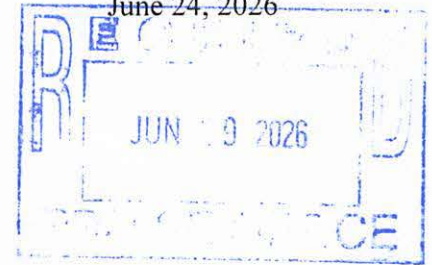
EXHIBIT 2

FILED
CLERK

2026 JUN 24 PM 9:17

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

June 24, 2026



The Honorable Margo K. Brodie
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Via Dropbox

Re: *Orrego v. Knipfing et al.*, Case No. 2:20-cv-03361- Notification of 172-Day Post-Recusal Void Period and Motion to Vacate Filed June 24, 2026 - Administrative Supervisory Notice Pursuant to 28 U.S.C. § 137

Dear Chief Judge Brodie:

I write to bring to Your Honor's attention, in Your Honor's capacity as Chief Judge of the Eastern District of New York pursuant to 28 U.S.C. § 137, a matter of serious administrative concern in Case No. 2:20-cv-03361.

On November 17, 2025, the Honorable Sanket J. Bulsara entered an Order of Recusal in Case No. 2:20-cv-03361, transferring the action to the Honorable Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings. The NEF states: "Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings." The CM/ECF system designated the case "2:20-cv-03361-PKC-TAM."

On November 26, 2025, the docket designation was administratively reverted from "2:20-cv-03361-PKC-TAM" back to "2:20-cv-03361-SJB-AYS" by clerk notation. This reversion was not accompanied by any judicial order. No judicial officer vacated, stayed, or modified the November 17, 2025, Order of Recusal. No order of Judge Chen has ever been entered in this action.

On May 8, 2026 — 172 days after the November 17, 2025, Order of Recusal — a 29-page Memorandum and Order (DE [244]) and a Judgment (DE [245]) were entered under "2:20-cv-03361-SJB-AYS." On the same day, Miscellaneous Case 2:26-mc-01957 was opened and immediately closed, with Plaintiff's three authorized May 5, 2026, submissions removed from the

REC'D IN PRO SE OFFICE
JUN 29 '26 AM 9:43

20-cv-3361 docket before DE [244] issued. A district-wide filing injunction was also imposed by DE [244] without compliance with the requirements of *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986).

On June 1, 2026, I filed a Notice of Appeal (DE [246]), and that appeal is pending in the Second Circuit as Case No. 26-1576. On June 24, 2026, I filed in the district court a complete Motion to Vacate pursuant to Fed. R. Civ. P. 62.1, 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), addressed to the Honorable Pamela K. Chen. A courtesy copy of the complete motion package is attached to this letter.

I respectfully bring these facts to Your Honor's attention as Chief Judge for administrative notice purposes, and to request that the Chief Judge take such administrative steps as may be appropriate to ensure that all filings in Case No. 2:20-cv-03361 are properly routed to the Honorable Pamela K. Chen as the lawfully assigned judicial officer since November 17, 2025, and not to any previously recused judicial officer.

I recognize that the Chief Judge's supervisory authority under 28 U.S.C. § 137 is administrative in nature and does not extend to ruling on the pending motion. I write for notice purposes only and respectfully request that Your Honor direct that the Clerk of Court route all future filings in Case No. 2:20-cv-03361 to Judge Chen.

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

Enclosure: Courtesy Copy — Complete Motion to Vacate Package (Exhibits 1–26)

cc: Honorable Pamela K. Chen, U.S.D.J.

Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)

Clerk of the United States Court of Appeals for the Second Circuit (Case No. 26-1576)

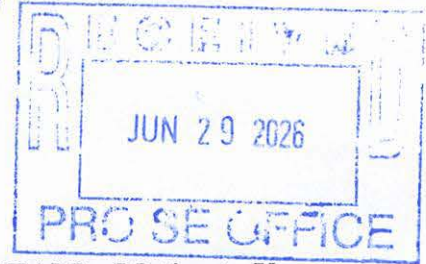
Gordon Rees Scully Mansukhani LLP (via ECF)

FILED
CLERK

June 24, 2026

2026 JUN 24 PM 9:17

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK



The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Via Dropbox

Re: *Orrego v. Knipfing et al.*, Case No. 2:20-cv-03361 (PKC)(TAM) - Motion to Vacate Pursuant to Fed. R. Civ. P. 62.1, 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), Courtesy Copy of Complete Motion Package (Exhibits 1–26)

Dear Judge Chen:

I write to provide Your Honor with a courtesy copy of the complete Motion to Vacate package filed today, June 24, 2026, in Case No. 2:20-cv-03361 at the Pro Se Office of the Eastern District of New York. I am submitting this letter and the complete motion package today.

The motion is addressed to Your Honor as the judicial officer to whom this action was reassigned pursuant to the November 17, 2025, Order of Recusal, which the Notice of Electronic Filing (“NEF”) confirms: “**Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings.**” I do not seek relief from, and do not consent to review by, any judicial officer previously recused or disqualified from this action. All rights and objections are expressly preserved.

Courtesy Copy Contents:

1. Application for Leave to File
2. Notice of Motion
3. Affirmation of Lidia M. Orrego in Support
4. Memorandum of Law
5. Exhibit Table
6. Proposed Order
7. Affirmation of Service
8. Exhibits 1 through 26 (physically attached; see Exhibit Table for complete index)

Note Regarding Exhibit 4 (Electronic Evidence Package): Exhibit 4 consists of two CD/DVD discs (Disc 1 of 2 and Disc 2 of 2) containing the same electronic evidence previously submitted as DE [229] on October 8, 2025, re-submitted in CD format pursuant to Fed. R. Civ. P. 56(e)(1). The two CD/DVD discs have been filed with the Clerk of Court as part of the original motion package. Pursuant to Your Honor's Individual Practices §1.A.ii, the CD/DVD discs are not included in this chamber's courtesy copy. If Your Honor's chambers wish to review the electronic evidence, I respectfully request that chambers obtain the Clerk's filed copy, or I can provide an additional set of discs upon request.

This motion presents six independent grounds for vacatur of the Memorandum and Order (DE [244]) and Judgment (DE [245]) entered May 8, 2026:

(1) void ab initio under Rule 60(b)(4) as orders entered by a recused judicial officer 172 days after the November 17, 2025, Order of Recusal;

(2) fraud, misrepresentation, and misconduct by Defendants under Rule 60(b)(3), including authenticated evidence of false signatures on written deposition responses (DE [84]) and five categories of fraud evidence in DE [190] — none rebutted by Defendants with admissible evidence;

(3) fraud upon the court under Rule 60(d)(3), including same-day removal of Plaintiff's authorized submissions through Miscellaneous Case 2:26-mc-01957 and section-by-section adoption of Defendants' submissions without independent analysis;

(4) extraordinary circumstances under Rule 60(b)(6), including the reversal of six findings from DE [30] without citation;

(5) twenty-one documented false statements and omissions (FS1–FS21); and

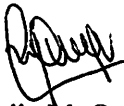
(6) Rule 56 violations including suppression of nineteen categories of evidence and denial of cross-motion in one sentence.

A Notice of Appeal (DE [246]) was filed June 1, 2026, and is pending in the U.S. Court of Appeals for the Second Circuit as Case No. 26-1576. This motion is filed pursuant to Fed. R. Civ. P. 62.1(a) and Fed. R. App. P. 12.1(a). I have filed the required notice with the Clerk of the Second Circuit. I respectfully request that Your Honor state pursuant to Rule 62.1(a)(3) that the Court would grant relief if the Second Circuit remands, or that this motion raises a substantial issue.

I also bring to Your Honor's attention that my letter motion (DE [232]), filed November 18, 2025, and addressed to Your Honor, remains pending and undecided. DE [232] requested a pre-motion conference, restoration of filing rights, and guidance on refileing my Summary Judgment papers following the November 17, 2025, reassignment. No order has been disposed of it. I respectfully request that DE [232] be calendared for consideration.

I respectfully request that this Court extend to me, as a Pro Se litigant without formal legal training, the leniency to which I am entitled under governing Second Circuit authority. See *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *Triestman v. Federal Bureau of Prisons*, 470 F.3d 471, 474–75 (2d Cir. 2006).

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

cc: Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)
Clerk of the United States Court of Appeals for the Second Circuit (Case No. 26-1576)
Gordon Rees Scully Mansukhani LLP (via ECF)

Dated June 24, 2026

Via ACMS & Email Only

Clerk of Court
United States Court of Appeals for the Second Circuit
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

2026 JUN 24 PM 9:17

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK



Re: *Orrego v. Knipping et al.*, Case No. 26-1576

Fed. R. App. P. 12.1(a) Notice of Indicative Ruling Motion Filed in District Court

Dear Clerk of Court:

Pursuant to Fed. R. App. P. 12.1(a) and Fed. R. Civ. P. 62.1(b), Plaintiff-Appellant Lidia M. Orrego hereby gives notice that on June 24, 2026, she filed a Motion for Indicative Ruling pursuant to Fed. R. Civ. P. 62.1 in the United States District Court for the Eastern District of New York, Case No. 2:20-cv-03361, addressed to the Honorable Pamela K. Chen.

The district court motion seeks: (1) an indicative ruling pursuant to Fed. R. Civ. P. 62.1(a)(3) that the district court would vacate the Memorandum and Order (DE [244]) and Judgment (DE [245]) entered May 8, 2026, pursuant to Fed. R. Civ. P. 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3) if the Second Circuit remands for that purpose, or that the motion raises a substantial issue; and (2) vacatur of the associated filing injunction.

The appeal in Case No. 26-1576 arises from DE [244] and DE [245]. This notice is provided to the Court of Appeals as required by Fed. R. App. P. 12.1(a). Upon the district court's statement that it would grant the motion or that the motion raises a substantial issue, Plaintiff-Appellant will promptly move this Court for a remand pursuant to Fed. R. App. P. 12.1(b).

The grounds for the district court motion include: (1) jurisdictional void — DE [244] and DE [245] entered 172 days after the November 17, 2025 Order of Recusal by a judicial officer without jurisdiction; (2) fraud by Defendants under Rule 60(b)(3); (3) fraud upon the court under Rule 60(d)(3); and (4) extraordinary circumstances under Rule 60(b)(6).

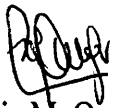
20-cv-3361 docket before DE [244] issued. A district-wide filing injunction was also imposed by DE [244] without compliance with the requirements of *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986).

On June 1, 2026, I filed a Notice of Appeal (DE [246]), and that appeal is pending in the Second Circuit as Case No. 26-1576. On June 24, 2026, I filed in the district court a complete Motion to Vacate pursuant to Fed. R. Civ. P. 62.1, 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), addressed to the Honorable Pamela K. Chen. A courtesy copy of the complete motion package is attached to this letter.

I respectfully bring these facts to Your Honor's attention as Chief Judge for administrative notice purposes, and to request that the Chief Judge take such administrative steps as may be appropriate to ensure that all filings in Case No. 2:20-cv-03361 are properly routed to the Honorable Pamela K. Chen as the lawfully assigned judicial officer since November 17, 2025, and not to any previously recused judicial officer.

I recognize that the Chief Judge's supervisory authority under 28 U.S.C. § 137 is administrative in nature and does not extend to ruling on the pending motion. I write for notice purposes only and respectfully request that Your Honor direct that the Clerk of Court route all future filings in Case No. 2:20-cv-03361 to Judge Chen.

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

Enclosure: Courtesy Copy — Complete Motion to Vacate Package (Exhibits 1–26)

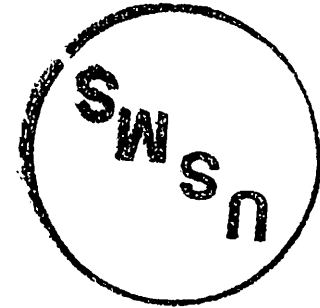
cc: Honorable Pamela K. Chen, U.S.D.J.

Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)

Clerk of the United States Court of Appeals for the Second Circuit (Case No. 26-1576)

Gordon Rees Scully Mansukhani LLP (via ECF)

101



Chief Judge Margo K. Brodie
225 Cadman Plaza East
Brooklyn New York 11201
Courtroom: 6F
Chambers: N 626

EXHIBIT 4

Clerk of Court
United States Court of Appeals for the Second Circuit
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007
Via ACMS

Dated July 4, 2026

Re: *Orrego v. Knipping et al.*, Case No. 26-1576
Supplemental Notice — Status of Motion to Vacate DE [244] and DE [245]; Reservation of Rights

Dear Clerk of Court:

Plaintiff-Appellant Lidia M. Orrego respectfully submits this supplemental notice to advise the Court that on June 24, 2026, she filed in the United States District Court for the Eastern District of New York, Case No. 2:20-cv-03361, a Motion to Vacate the Memorandum and Order (DE [244]) and Judgment (DE [245]) entered May 8, 2026, pursuant to Fed. R. Civ. P. 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), together with a related request for an indicative ruling under Fed. R. Civ. P. 62.1. Notice of that motion was concurrently provided to this Court pursuant to Fed. R. App. P. 12.1(a) on June 24, 2026.

Plaintiff-Appellant further advises the Court that, in the event the District Court fails to docket, process, or timely act upon the Motion to Vacate, or in the event the motion is diverted or otherwise disposed of without proper judicial action — including through any administrative reassignment or miscellaneous-case mechanism of the kind previously documented in this action — Plaintiff-Appellant expressly reserves all rights and remedies arising therefrom. These include, without limitation, the right to seek a writ of mandamus compelling District Court action, to move this Court for appropriate relief under Fed. R. App. P. 12.1(b) upon any indicative ruling or refusal to rule, and to raise the District Court's inaction or the manner of disposition as an independent ground for relief in this appeal.

This notice is submitted for the record to preserve the appellate record in Case No. 26-1576 and to ensure the Court is apprised of the current procedural posture of the related District Court motion. **Attachments:** Exhibits 1–6 (identified below).

Respectfully submitted,

/s/ Lidia M. Orrego
Lidia M. Orrego
Plaintiff-Appellant, Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: orregoprose@gmail.com

INDEX OF ATTACHED EXHIBITS

Ex.	Document	Dated	Pages
1	FRAP 12.1(a) Notice of Indicative Ruling Motion Filed in District Court, to Clerk, Second Circuit	June 24, 2026	2
2	Letter to Hon. Pamela K. Chen, U.S.D.J. — Courtesy Copy of Complete Motion to Vacate Package (Exhibits 1–26)	June 24, 2026	3
3	Letter to Hon. Margo K. Brodie, Chief U.S.D.J. — Administrative Supervisory Notice Pursuant to 28 U.S.C. § 137	June 24, 2026	2
4	Notice to the Clerk of Court / Application for Leave to File, incl. Filing Inventory	June 24, 2026	2
5	Email to GRSM Counsel (Minnah-Donkoh, Colwin) Confirming Service of Motion to Vacate Package, Fed. R. Civ. P. 5(b)(2)(E)	June 24, 2026	2
6	Digital Evidence Submission Cover Page (Bates 143) and Physical CD/DVD Disc Labels Photograph (Bates 144) — Disc 1 of 2 (Folders 1–8) / Disc 2 of 2 (Folder 9: family videos)	June 24, 2026	1

EXHIBIT 1

FILED
CLERK

Dated June 24, 2026

Via ACMS & Email Only
2026 JUN 24 PM 9:16

Clerk of Court
United States Court of Appeals for the Second Circuit
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Re: *Orrego v. Knipfing et al.*, Case No. 26-1576
Fed. R. App. P. 12.1(a) Notice of Indicative Ruling Motion Filed in District Court

Dear Clerk of Court:

Pursuant to Fed. R. App. P. 12.1(a) and Fed. R. Civ. P. 62.1(b), Plaintiff-Appellant Lidia M. Orrego hereby gives notice that on June 24, 2026, she filed a Motion for Indicative Ruling pursuant to Fed. R. Civ. P. 62.1 in the United States District Court for the Eastern District of New York, Case No. 2:20-cv-03361, addressed to the Honorable Pamela K. Chen.

The district court motion seeks: (1) an indicative ruling pursuant to Fed. R. Civ. P. 62.1(a)(3) that the district court would vacate the Memorandum and Order (DE [244]) and Judgment (DE [245]) entered May 8, 2026, pursuant to Fed. R. Civ. P. 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3) if the Second Circuit remands for that purpose, or that the motion raises a substantial issue; and (2) vacatur of the associated filing injunction.

The appeal in Case No. 26-1576 arises from DE [244] and DE [245]. This notice is provided to the Court of Appeals as required by Fed. R. App. P. 12.1(a). Upon the district court's statement that it would grant the motion or that the motion raises a substantial issue, Plaintiff-Appellant will promptly move this Court for a remand pursuant to Fed. R. App. P. 12.1(b).

The grounds for the district court motion include: (1) jurisdictional void — DE [244] and DE [245] entered 172 days after the November 17, 2025 Order of Recusal by a judicial officer without jurisdiction; (2) fraud by Defendants under Rule 60(b)(3); (3) fraud upon the court under Rule 60(d)(3); and (4) extraordinary circumstances under Rule 60(b)(6).

Copies of this notice and the district court Letter to Judge Chen dated June 24, 2026 are attached as exhibits to the district court motion package filed simultaneously.

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

cc: Gordon Rees Scully Mansukhani LLP (Counsel for Defendants-Appellees)

Honorable Pamela K. Chen, U.S.D.J. (EDNY — via courtesy copy)

Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)

EXHIBIT 2

FILED
CLERK

June 24, 2026

2026 JUN 24 PM 9:15

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Via Dropbox

Re: *Orrego v. Knipping et al.*, Case No. 2:20-cv-03361 (PKC)(TAM) - Motion to Vacate Pursuant to Fed. R. Civ. P. 62.1, 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), Courtesy Copy of Complete Motion Package (Exhibits 1–26)

Dear Judge Chen:

I write to provide Your Honor with a courtesy copy of the complete Motion to Vacate package filed today, June 24, 2026, in Case No. 2:20-cv-03361 at the Pro Se Office of the Eastern District of New York. I am submitting this letter and the complete motion package today.

The motion is addressed to Your Honor as the judicial officer to whom this action was reassigned pursuant to the November 17, 2025, Order of Recusal, which the Notice of Electronic Filing (“NEF”) confirms: “**Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings.**” I do not seek relief from, and do not consent to review by, any judicial officer previously recused or disqualified from this action. All rights and objections are expressly preserved.

Courtesy Copy Contents:

1. Application for Leave to File
2. Notice of Motion
3. Affirmation of Lidia M. Orrego in Support
4. Memorandum of Law
5. Exhibit Table
6. Proposed Order
7. Affirmation of Service
8. Exhibits 1 through 26 (physically attached; see Exhibit Table for complete index)

Note Regarding Exhibit 4 (Electronic Evidence Package): Exhibit 4 consists of two CD/DVD discs (Disc 1 of 2 and Disc 2 of 2) containing the same electronic evidence previously submitted as DE [229] on October 8, 2025, re-submitted in CD format pursuant to Fed. R. Civ. P. 56(e)(1). The two CD/DVD discs have been filed with the Clerk of Court as part of the original motion package. Pursuant to Your Honor's Individual Practices §1.A.ii, the CD/DVD discs are not included in this chamber's courtesy copy. If Your Honor's chambers wish to review the electronic evidence, I respectfully request that chambers obtain the Clerk's filed copy, or I can provide an additional set of discs upon request.

This motion presents six independent grounds for vacatur of the Memorandum and Order (DE [244]) and Judgment (DE [245]) entered May 8, 2026:

(1) void ab initio under Rule 60(b)(4) as orders entered by a recused judicial officer 172 days after the November 17, 2025, Order of Recusal;

(2) fraud, misrepresentation, and misconduct by Defendants under Rule 60(b)(3), including authenticated evidence of false signatures on written deposition responses (DE [84]) and five categories of fraud evidence in DE [190] — none rebutted by Defendants with admissible evidence;

(3) fraud upon the court under Rule 60(d)(3), including same-day removal of Plaintiff's authorized submissions through Miscellaneous Case 2:26-mc-01957 and section-by-section adoption of Defendants' submissions without independent analysis;

(4) extraordinary circumstances under Rule 60(b)(6), including the reversal of six findings from DE [30] without citation;

(5) twenty-one documented false statements and omissions (FS1–FS21); and

(6) Rule 56 violations including suppression of nineteen categories of evidence and denial of cross-motion in one sentence.

A Notice of Appeal (DE [246]) was filed June 1, 2026, and is pending in the U.S. Court of Appeals for the Second Circuit as Case No. 26-1576. This motion is filed pursuant to Fed. R. Civ. P. 62.1(a) and Fed. R. App. P. 12.1(a). I have filed the required notice with the Clerk of the Second Circuit. I respectfully request that Your Honor state pursuant to Rule 62.1(a)(3) that the Court would grant relief if the Second Circuit remands, or that this motion raises a substantial issue.

I also bring to Your Honor's attention that my letter motion (DE [232]), filed November 18, 2025, and addressed to Your Honor, remains pending and undecided. DE [232] requested a pre-motion conference, restoration of filing rights, and guidance on refileing my Summary Judgment papers following the November 17, 2025, reassignment. No order has been disposed of it. I respectfully request that DE [232] be calendared for consideration.

I respectfully request that this Court extend to me, as a Pro Se litigant without formal legal training, the leniency to which I am entitled under governing Second Circuit authority. See *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *Triestman v. Federal Bureau of Prisons*, 470 F.3d 471, 474–75 (2d Cir. 2006).

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

cc: Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)
Clerk of the United States Court of Appeals for the Second Circuit (Case No. 26-1576)
Gordon Rees Scully Mansukhani LLP (via ECF)

EXHIBIT 3

FILED
CLERK

2026 JUN 24 PM 9: 16

June 24, 2026

The Honorable Margo K. Brodie
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Via Dropbox

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Re: *Orrego v. Knipping et al.*, Case No. 2:20-cv-03361- Notification of 172-Day Post-Recusal Void Period and Motion to Vacate Filed June 24, 2026 - Administrative Supervisory Notice Pursuant to 28 U.S.C. § 137

Dear Chief Judge Brodie:

I write to bring to Your Honor's attention, in Your Honor's capacity as Chief Judge of the Eastern District of New York pursuant to 28 U.S.C. § 137, a matter of serious administrative concern in Case No. 2:20-cv-03361.

On November 17, 2025, the Honorable Sanket J. Bulsara entered an Order of Recusal in Case No. 2:20-cv-03361, transferring the action to the Honorable Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings. The NEF states: "Case randomly reassigned to Judge Pamela K. Chen and Magistrate Judge Taryn A. Merkl for all further proceedings." The CM/ECF system designated the case "2:20-cv-03361-PKC-TAM."

On November 26, 2025, the docket designation was administratively reverted from "2:20-cv-03361-PKC-TAM" back to "2:20-cv-03361-SJB-AYS" by clerk notation. This reversion was not accompanied by any judicial order. No judicial officer vacated, stayed, or modified the November 17, 2025, Order of Recusal. No order of Judge Chen has ever been entered in this action.

On May 8, 2026 — 172 days after the November 17, 2025, Order of Recusal — a 29-page Memorandum and Order (DE [244]) and a Judgment (DE [245]) were entered under "2:20-cv-03361-SJB-AYS." On the same day, Miscellaneous Case 2:26-mc-01957 was opened and immediately closed, with Plaintiff's three authorized May 5, 2026, submissions removed from the

20-cv-3361 docket before DE [244] issued. A district-wide filing injunction was also imposed by DE [244] without compliance with the requirements of *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986).

On June 1, 2026, I filed a Notice of Appeal (DE [246]), and that appeal is pending in the Second Circuit as Case No. 26-1576. On June 24, 2026, I filed in the district court a complete Motion to Vacate pursuant to Fed. R. Civ. P. 62.1, 60(b)(3), 60(b)(4), 60(b)(6), and 60(d)(3), addressed to the Honorable Pamela K. Chen. A courtesy copy of the complete motion package is attached to this letter.

I respectfully bring these facts to Your Honor's attention as Chief Judge for administrative notice purposes, and to request that the Chief Judge take such administrative steps as may be appropriate to ensure that all filings in Case No. 2:20-cv-03361 are properly routed to the Honorable Pamela K. Chen as the lawfully assigned judicial officer since November 17, 2025, and not to any previously recused judicial officer.

I recognize that the Chief Judge's supervisory authority under 28 U.S.C. § 137 is administrative in nature and does not extend to ruling on the pending motion. I write for notice purposes only and respectfully request that Your Honor direct that the Clerk of Court route all future filings in Case No. 2:20-cv-03361 to Judge Chen.

Respectfully submitted,



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

Enclosure: Courtesy Copy — Complete Motion to Vacate Package (Exhibits 1–26)

cc: Honorable Pamela K. Chen, U.S.D.J.

Honorable Margo K. Brodie - Chief United States District Judge (EDNY — via courtesy copy)

Clerk of the United States Court of Appeals for the Second Circuit (Case No. 26-1576)

Gordon Rees Scully Mansukhani LLP (via ECF)

EXHIBIT 4

FILED
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

2026 JUN 24 PM 9:16

Lidia M. Orrego,
Plaintiff,
-against-

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

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,
Defendants.
_____x

NOTICE TO THE CLERK OF COURT

Plaintiff respectfully directs the Clerk of Court to file this Application and the accompanying Motion to Vacate package in Case No. 2:20-cv-03361 and to transmit a copy to the Chambers of the Honorable Pamela K. Chen, United States District Judge, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201.

Pursuant to the Individual Practices of the Honorable Pamela K. Chen, Plaintiff is providing one hard copy of the complete Motion to Vacate package and two CD/DVD discs (Exhibit 4) containing the electronic evidence referenced therein. Plaintiff respectfully requests that the Court extend to her, as a Pro Se litigant, the leniency to which she is entitled under governing Second Circuit authority. See *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *Triestman v. Federal Bureau of Prisons*, 470 F.3d 471, 474–75 (2d Cir. 2006).

Plaintiff expressly objects to the routing of this filing to Miscellaneous Case No. 2:26-mc-01957 or to the Chambers of the Honorable Sanket J. Bulsara. The pre-screening mechanism imposed by DE [244] is a void post-recusal act entered without jurisdiction 172 days after the November 17, 2025, Order of Recusal.

Plaintiff respectfully requests that the Clerk provide a file-stamped copy confirming that this filing has been docketed in Case No. 2:20-cv-03361. Plaintiff is filing via and will await confirmation of correct docketing at the time of submission.

This Notice and the objection set forth herein are made on the record and Plaintiff preserves all rights arising from any improper routing of this filing, including the right to seek intervention by the United States Court of Appeals for the Second Circuit in Case No. 26-1576 and by Chief Judge Margo K. Brodie under 28 U.S.C. § 137.

FILING INVENTORY

1. Application for Leave to File (this document)
2. Notice of Motion
3. Affirmation of Lidia M. Orrego in Support
4. Memorandum of Law
5. Exhibit Table
6. Proposed Order
7. Affirmation of Service
8. Exhibits 1–26 (Physically Attached; see Exhibit Table for complete index)
9. Exhibit 4 consists of two CD/DVD discs (Disc 1 of 2 and Disc 2 of 2) containing the electronic evidence previously submitted as DE [229] on October 8, 2025, re-submitted pursuant to Fed. R. Civ. P. 56(e)(1). The cover page of Exhibit 4 (filed via ECF) contains a photograph of the two discs and a complete inventory of their contents. Physical copies of the two discs are being served on Defendants’ counsel by first-class mail simultaneously with this filing.

Hard Copy Provided (per Judge Chen Individual Practices): ☒ Yes

Courtesy Copy to Judge Chen Chambers: ☒ Yes (filing via Dropbox, without CD/DVD discs)

Letter to Chief Judge Brodie: ☒ Yes (delivered filing via Dropbox)

FRAP 12.1(a) **Notice of Indicative Ruling Motion Filed in District Court** — Notice to the Second Circuit that Plaintiff filed a Rule 60 Motion to Vacate and Request for Indicative Ruling in the District Court pursuant to Fed. R. Civ. P. 62.1 and FRAP 12.1 while Appeal No. 26-1576 remains pending.: ☒ Yes

Respectfully submitted,

Dated: June 24, 2026
Rego Park, New York

/s/ Lidia M. Orrego
Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd., Apt. 3E
Rego Park, New York 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com