

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

11/18/78

Pls Demand  
for B/P  
Index No.  
10726-1978

-----x  
GEORGE SASSOWER,

Plaintiff,

-against-

ERNEST L. SIGNORELLI, ANTHONY MASTROIANNI,  
VINCENT G. BERGER, JR., JOHN P. FINNERTY,  
ALLAN CROCE, ANTHONY GRZYMALSKI, CHARLES  
BROWN, HARRY E. SEIDELL, NEW YORK NEWS,  
INC. and VIRGINIA D. MATHIAS,

Defendants.  
-----x

S I R S:

Plaintiff hereby demands that within ten days, you  
serve and file a verified bill of particulars with respect  
to defenses set forth in your (HOWARD E. PACHMAN, Esq.) verified  
answer.

1. Set forth a true copy of any judgment and all other documents relied upon for the alleged defense of "res judicata".
2. Set forth a true copy of any judgment and all other documents relied upon for the alleged defense of "collateral estoppel".
3. As to each and every defendant set forth their position and title (and dates thereof) with sufficient specificity for determining whether a Notice of Claim is and was required.
4. As to each and every allegation complaint of in the complaint set forth the "culpable conduct" of plaintiff claimed to have caused his alleged injuries and damages, when and where it occurred, the persons involved, and the manner it relates to plaintiff's injuries and damages.
5. With respect to the "Fifth Affirmative Defense" set forth who, how, and the portions of the body that "plaintiff first assaulted and struck" and the injuries caused thereby.

6. With respect to such defense set forth the force employed and identify the person inflicting same.

7. As to all acts complained of separately set forth the "duties and responsibilities" of the "police officers and deputy sheriffs" at each occasion.

8. As to all acts complained of separately set forth the persons who imposed such "duties and responsibilities" upon the "deputy sheriffs" involved.

9. As to all acts complained of separately set forth the basis for each defendant believing that he was exercising his "statutory and constitutionally inherent power".

10. Set forth the force employed by the defendants as alleged in paragraph "Nineteenth" of the verified answer.

11. As to all acts complained of separately set forth any and all inquiries made by each of the defendants prior to the conduct complained of in order to ascertain the legality of their actions and the results thereof.

Dated: November 18, 1978

Yours, etc.,

GEORGE SASSOWER, Esq.  
Attorney for plaintiff-pro se.  
75 Wykagyl Station  
New Rochelle, New York, 10804

To: HOWARD E. PACHMAN, Esq.  
LOUIS J. LEFKOWITZ, Esq.  
TOWNLEY & UPDIKE, Esqs.  
JAMES MARSCH, Esq.