

CENTER *for* JUDICIAL ACCOUNTABILITY, INC.

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July 30, 2026

TO: Second Circuit Court of Appeals Clerk Catherine O'Hagan Wolfe

FROM: Elena Sassower, Petitioner *Pro Se*

RE: **Correcting & Clarifying Your July 29, 2026 "For the Court" Order**
Docket #26-1905 – Mandamus Proceeding:

In re CENTER FOR JUDICIAL ACCOUNTABILITY, Inc.
and ELENA RUTH SASSOWER, individually and
as director of the Center for Judicial Accountability, Inc.,
*acting on their own behalf and on behalf of the People
of the State of New York & the Public Interest*

This responds to the [July 29th Order](#), which, beneath the words "For the Court", appear your printed name, title, and a depiction of the Second Circuit's seal with your electronic signature through it.

What is the meaning of "For the Court"? Has [Mr. Zerman's July 15th motion for pro hac vice admission](#) been denied by the Court's judges – and, if so, how many judges and what are their names? Or is it by you?

And why has the Order been issued with an incorrect caption? Or do you NOT know that the Order's caption is incorrect? On what basis has the caption of petitioners' [July 10th Verified Petition for a Writ of Mandamus](#) been falsified? Are you unaware of my [July 16th letter, signed by myself and Mr. Zerman](#), constituting petitioners' formal request for correction of the three incorrect captions appearing on the docket? What about my [July 27th "Acknowledgment and Notice of Appearance"](#), which, responding to the question as to whether the indicated caption is 'Correct', checked the box that it is "Incorrect" and attached the July 16th letter. How about my [July 28th e-mail concerning Mr. Zerman's "Acknowledgment and Notice of Appearance"](#), reiterating petitioners' entitlement to correction of the incorrect docket captions?

Who is responsible for falsifying, or directing the falsification of, the docket captions which the July 29th Order continues, as if not already demonstrated as false by the July 16th letter. Is it your view – and that of "the Court" – that rectifying the false captions was not a **#1 PRIORITY**? Why have they not been corrected, consistent with the July 16th letter – or do you dispute the 100% accuracy of that letter? And are you unaware that as a result of the caption

falsification and other record tampering by you or those under your supervision,¹ the case and its record do not come up upon internet searches – a result presumably intended

As to the substance of the [July 29th Order](#) whose denial of [Mr. Zerman's July 15th *pro hac vice* motion](#) is stated to be “without prejudice to renewal. Any renewed motion must comply with Local Rule 46.1(d)”, are you saying that an attorney admitted *pro hac vice* by a district judge of the Second Circuit to represent a party in a civil case who is not *in forma pauperis*, is not, as a matter of course, admitted *pro hac vice* by the Second Circuit Court of Appeals to represent that same party on the appeal of the district court case or in a mandamus/prohibition proceeding arising from the case? Really? As, surely, it is NOT a rare circumstance that such a *pro hac vice* attorney below makes a motion to this Court to be admitted *pro hac vice* in connection with the district court case, please furnish some illustrative denials – even one – so as to demonstrate that this case is not being handled in an invidious, selective manner.

Suffice to say that prior to Mr. Zerman filing his July 15th *pro hac vice* motion, I had spoken to Second Circuit Administrative Manager Richard Alcantara about proper procedure for such motion and, thereafter, on July 15th, with Second Circuit Attorney Admissions Clerk Joseph Rodriguez. Mr. Rodriguez stated that Mr. Alcantara is his supervisor and we specifically discussed [Local Rule 46.1\(d\), entitled “Pro Hac Vice Admission”](#), which, tellingly, is NOT readily accessible from [the Second Circuit's website](#), indeed, not accessible at all from the top panel tab “Attorneys”, whose single relevant drop down, “[Attorney Admissions and Renewals](#)”, contains NO hyperlinks for *pro hac vice* admission.

Why is that? And why, as I discussed with Mr. Rodriguez, does Local Rule 46.1(d) read:

“(d) Pro Hac Vice Admission. An attorney may be admitted *pro hac vice* to appear in a particular proceeding without formally applying for admission or paying the admission fee. *Pro hac vice* admission will be considered on submission of a written motion to the court before filing a notice of appearance. To qualify, the attorney must be a member in good standing of a state or the District of Columbia bar and must be one of the following:

- (1) a member of the bar of a district court within the circuit who has represented a criminal defendant at trial and appears for that defendant on an appeal taken under 18 U.S.C. §3006A;
- (2) acting for a party proceeding *in forma pauperis*; or

¹ Among the criminal statutes seemingly applicable to the falsification and record tampering that has been going on: [18 U.S. Code § 2071\(b\)](#); [18 U.S. Code § 1001](#); [18 U.S. Code §4](#).

(3) able to demonstrate exceptional circumstances justifying admission for the particular proceeding.”

How is this applicable to an attorney, such as Mr. Zerman, admitted *pro hac vice* in the Southern District of New York, pursuant to [its Local Rule 1.3\(i\), \(j\), \(k\)](#), to represent his client and who now seeks *pro hac vice* admission in the Second Circuit Court of Appeals so as to continue to represent his same client in connection with the same case – unless his unexceptional *pro hac vice* admission in the Southern District and full familiarity with the case are deemed “exceptional circumstances”.

Mr. Rodriguez had no answer but agreed that it should be sufficient for Mr. Zerman to annex to his affidavit in support of his *pro hac vice* motion the Order of Southern District of New York Judge Karas that had granted him *pro hac vice* admission in the Southern District and his underlying motion to Judge Karas – which is precisely what Mr. Zerman did.

Notably, your July 29th “For the Court” Order does NOT state – as it certainly could have – that *pro hac vice* admission pursuant to Local Rule 46.1(d) is inapplicable to the situation at bar – and that, pursuant to [Local Rule 46.1](#), invoked by Mr. Zerman’s motion, he must apply for regular admission pursuant to its paragraph (a), for which he would require a “sponsor’s motion”, *to wit*, a “written or oral motion of a member of the court’s bar”, as described by [FRAP 46\(a\)\(3\) “Admission Procedures”](#), with [the Second Circuit’s website providing the form](#) – and that, in the absence of any “member of the court’s bar” to whom he could turn as “sponsor”, such would qualify as “exceptional circumstances”.

As for the timing of your July 29th Order, was it coincidental that it came the day following [my alerting July 28th e-mail](#), stating, in connection with Mr. Zerman’s “Acknowledgment and Notice of Appearance” which, according to the Court’s [July 14th “Docketing Notice”](#), was due on July 28th, that I had been unable to reach him since July 25th and that this was “NOT usual” and I was “quite concerned, as Mr. Zerman has been contending with serious medical illness. I pray that he is *incommunicado* by reason of hospitalization – not worse.” (capitalization and italics in the original).

Yesterday morning, prior to calling the Valencia, California Police to request a welfare check at Mr. Zerman’s home and office, I called the number that I had called so many times over the previous four days and was relieved, to the point of near tears, when he picked up the phone that he was still alive, as I had already concluded he was not. Though still suffering the after-effects of cumulative medical treatments that had disabled him for four days, we engaged in over an hour’s conversation, reviewing all that happened in the case since we had last spoken at about 5:30 pm on Friday, July 24th and agreeing that later in the day he would file his “Acknowledgment and Notice of Appearance”. Five hours later, he was ready to sign it and send it back to me so that I could assemble it, with the required Addendum A and the substantiating July 16th letter detailing the incorrect captions. It was then that I checked the case docket and discovered the July 29th Order, e-mailing it to Mr. Zerman. We thereupon decided to hold off sending Mr. Zerman’s

already prepared “Acknowledgment and Notice of Appearance” and that I would draft a response to the Order, to be sent out today, after we had reviewed it, in our usual fashion, line-by-line. This we have now done, twice – and Mr. Zerman’s signature, attesting to his review and approval, is below.

We request your response to this letter’s questions, as immediately as possible – this being a mandamus proceeding entitled to expedition and necessitating same in the “**catastrophic, emergency situation**” which the [July 10th Verified Petition for a Writ of Mandamus](#) describes (at pp. 5-6) and our [July 13th affidavit in further support](#) reiterates (at ¶7):

“mandamus being an ‘extraordinary writ’, it is appropriate to the **extraordinary, catastrophic, emergency situation presented by petitioners’** [October 29, 2025 verified amended complaint](#), chronicling, *with evidence entitling them to summary judgment*, the destruction of New York’s ‘Republican Form of Government’, concealed and abetted by defendants’ *knowingly* false, ‘fake news’ journalism, injuring, massively and irreparably,^{fn3} the State of New York and its People, including by rigging New York’s elections, such as this year for governor, lieutenant governor, attorney general, comptroller, all 213 state legislative seats, and for a dozen or so D.A.s, to which Judge Karas was specifically alerted by petitioners’ [February 23, 2026 letter](#) and [May 8, 2026 letter](#).” (bold and hyperlinking in the original, with the footnote below).

In view of [your decades at the Appellate Division, First Department and at this Court](#), it is appropriate that you acknowledge the facts, extrajudicial to this mandamus proceeding, giving rise to your personal bias against petitioners and direct knowledge of, and interest in, what is particularized by our underlying [October 29th verified amended complaint](#) and [December 19th affidavit demonstrating subject matter jurisdiction](#), and by our “timely and sufficient” [June 4th affidavit for Judge Karas’ disqualification/disclosure pursuant to 28 U.S.C §§144 and 455](#) – the subject of our [July 10th Verified Petition for a Writ of Mandamus](#), to which the SOLE respondent is Southern District of New York Judge Karas, so-identified by our July 10th certificate of service/delivery, annexed thereto and by our [July 16th letter](#) (at p 2).

For your convenience, here’s the link to the [Judicial Conference’s Code of Conduct for Judicial Employees](#), whose Canon 3(F)(3) “Conflicts of Interest” provision reads:

^{fn3} ‘When a petitioner faces significant ‘irreversible, non-monetary harm’... mandamus may issue to prevent that harm. [In re Depuy Orthopaedics, Inc.](#), 870 F.3d 345, 353 (5th Cir. 2017). ...we give consideration ‘to the severity and extent of this damage, and in particular to whether a petitioner has lost precious constitutional rights.’...’, [In re A.H.](#), 999 F.3d 98 (2d Cir 2021).”

“When a judicial employee knows that a conflict of interest may be presented, the judicial employee should promptly inform his or her appointing authority. The appointing authority, after determining that a conflict or the appearance of a conflict of interest exists, should take appropriate steps to restrict the judicial employee’s performance of official duties in such matter so as to avoid a conflict or the appearance of a conflict of interest. A judicial employee should observe any restrictions imposed by his or her appointing authority in this regard.”

As the Court is your “appointing authority”, pursuant to [28 U.S.C. §711](#), and because **TIME IS OF THE ESSENCE**, with the 2026 elections for New York’s governor, lieutenant governor, attorney general, comptroller, all 213 state legislative seats, and for a dozen or so D.A.s now less than 100 days away, we request that you immediately furnish this letter to Second Circuit Chief Judge Raymond Lohier, Jr. for his supervisory evaluation of how this “Electoral Time-Sensitive” mandamus proceeding has been proceeding – or not – since its July 10th filing.

Mr. Zerman’s “Acknowledgment and Notice of Appearance” – the same as we were planning to send yesterday, only now bearing today’s date – is herewith attached.

This letter being petitioners’ response to the July 29th Order, we request it be so-indicated in posting the letter on the docket.

Thank you.

s/ELENA RUTH SASSOWER

Read & approved by: s/GARY L. ZERMAN, ESQ.

Signatures on next page to preserve live hyperlink


ELENA RUTH SASSOWER

Read & approved by: 
GARY L. ZERMAN, ESQ.

ACKNOWLEDGMENT AND NOTICE OF APPEARANCE

Short Title: In Re: Elena Ruth Sassower

Docket No.: 26-1905

Lead Counsel of Record (name/firm) ~~or Pro se Party (name)~~: Gary L. Zeman, Esq.

Appearance for (party/designation): Center for Judicial Accountability, Inc. on its own behalf & on behalf of the People of the State of NY & the Public Interest

DOCKET SHEET ACKNOWLEDGMENT/AMENDMENTS

Caption as indicated is:

☐ Correct

☒ Incorrect. See attached caption page with corrections. July 16, 2026 letter.

Appellate Designation is:

☐ Correct

☐ Incorrect. The following parties do not wish to participate in this appeal:

Parties: _____

☐ Incorrect. Please change the following parties' designations:

Party _____

Correct Designation

Contact Information for Lead Counsel/Pro Se Party is:

☒ Correct

☐ Incorrect or Incomplete. As an e-filer, I have updated my contact information in the PACER "Manage My Account" screen.

Name: _____

Firm: _____

Address: _____

Telephone: _____

Fax: _____

Email: _____

RELATED CASES

☒ This case has not been before this Court previously.

☐ This case has been before this Court previously. The short title, docket number, and citation are: _____

☐ Matters related to this appeal or involving the same issue have been or presently are before this Court. The short titles, docket numbers, and citations are: _____

CERTIFICATION

I certify that ☐ I am admitted to practice in this Court and, if required by LR 46.1(a)(2), have renewed my admission on _____ OR that ☒ I applied for admission on July 15, 2026 or renewal on _____

Signature of Lead Counsel of Record: Gary L. Zeman 7/30/2026 If the Court has not yet admitted me or approved my renewal, I have completed Addendum A.

Type or Print Name: Gary L. Zeman, Esq.

OR

Signature of pro se litigant: _____

Type or Print Name: _____

☐ I am a pro se litigant who is not an attorney.

☐ I am an incarcerated pro se litigant.

ADDENDUM A TO ACKNOWLEDGMENT AND NOTICE OF APPEARANCE

Instructions: This addendum must be (1) completed by counsel whom the Court has not yet admitted or approved for renewed admission, (2) submitted electronically as a separate attachment when filing the Acknowledgment and Notice of Appearance (use the multiple attachments option when filing the Acknowledgment and Notice of Appearance) with client personal contact information redacted, and (3) submitted in unredacted form in accordance with the procedures outlined in Local Rule 25.2(c) and (d). If counsel represents multiple parties in the same appeal for which the Acknowledgment and Notice of Appearance is being filed, the attorney must separately list each client and provide the client's personal contact information. Attach additional pages as necessary.

Case Information:

Short Title: In Re: Elena Ruth Sassower Docket Number: 26-1905

Personal Contact Information:

Client 1:

Name: Center for Judicial Accountability, Inc.
Address: Box 8101 White Plains, New York 10602
Telephone: 914-421-1200 Fax: _____
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Client 2:

Name: _____
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Client 3:

Name: _____
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Email: _____

Client 4:

Name: _____
Address: _____
Telephone: _____ Fax: _____
Email: _____

Client 5:

Name: _____
Address: _____
Telephone: _____ Fax: _____
Email: _____

CENTER *for* JUDICIAL ACCOUNTABILITY, INC.

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July 16, 2026

TO: Second Circuit Court of Appeals
ATT: Case Manager Steve Giovanniello

FROM: Elena Sassower, Petitioner *Pro Se*

RE: Docket #26-1905 – July 10, 2026 Verified Petition for a Writ of Mandamus
In re CENTER FOR JUDICIAL ACCOUNTABILITY, Inc.
and ELENA RUTH SASSOWER, individually and
as director of the Center for Judicial Accountability, Inc.,
acting on their own behalf and on behalf of the People
of the State of New York & the Public Interest

Following up our phone conversation late yesterday afternoon (212-857-8529), for which I thank you, here, as you requested, is petitioners' letter that I understood you to say would be docketed, requesting that the short title of petitioners' mandamus proceeding, currently appearing at the top of the Second Circuit's electronic docket as "In Re: Elena Ruth Sassower", be corrected to, at very least, "In Re: Center for Judicial Accountability, Inc."

This is consistent with the above full title of petitioners' July 10, 2026 Verified Petition for a Writ of Mandamus, where the Center for Judicial Accountability, Inc. is the FIRST petitioner, not me.

Indeed, also needing to be corrected is what you stated, at least initially, to be the full title of the mandamus proceeding appearing later down on the Second Circuit's docket. Here's the print-out of the docket that, with your assistance, I was able to access. Only in writing this letter did I read the portion to which you referred me (at p. 5) – and it is also incorrect, TOTALLY:

- It first furnishes a slightly more expanded shortened title as "In Re: Elena Ruth Sassower, Center for Judicial Accountability, Inc., Petitioners" – which is incorrect;
- It then furnishes, in case caption formatting, the supposed full title, beginning with the petitioners, now identified as "Elena Ruth Sassower, individually and as director of the Center for Judicial Accountability, Inc., Center For Judicial Accountability, Inc., acting on its own behalf and on behalf of the People of the State of New York & the Public Interest – which is incorrect, including by substituting the word "its" for "their" so as to make it appear that I am not also, and in two capacities, "acting...on behalf of the People of the State of New York & the Public Interest".¹

¹ The capitalization of "For" is also incorrect.

- It then continues, in case caption formatting, to identify 34 respondents – and this too is incorrect. There are NO respondents, other than Judge Karas – and I set this forth by my Certificate of service/delivery, attached to the end of the July 10, 2026 Verified Petition for a Writ of Mandamus that at 1:10 pm on July 10th I e-mailed for electronic filing to prosecases@ca2.uscourts.gov and newcases@ca2.uscourts.gov, paying the \$600 filing fee, in cash, in person, at about 3:10 pm, at the Second Circuit Courthouse, Room 150, to Records Administrative Manager Richard Alcantara because *pro se* litigants, who are not attorneys, are not permitted to pay electronically. Moreover, the 34 captioned respondents are incorrectly identified – the correct identification would be the same as the 34 defendants in the caption of the October 29, 2025 verified amended complaint in Center for Judicial Accountability, Inc., et al. v. Legislative Correspondents Association, Inc., et al. (25-CV-8370), before Judge Karas.²

The erroneousess of this supposed full title of the mandamus proceeding is replicated in the docket's preceding section for parties ([at pp.1-4](#)), beginning with the first two boxes for petitioners (at p. 1), followed by 34 boxes for the 34 purported respondents (at pp. 1-4). This includes attaching the words “representative of other New York & national media” to the purported 25th respondent, THE FREE PRESS (at p.1).³

I have discussed the foregoing with petitioner CJA's counsel Gary Zerman, who has read and approved the letter – and, with me, has signed it on the next page, so as not to destroy the live hyperlinks. **Both of us request that, if possible, the shortened title of the mandamus proceeding be the same as appears in the subject line of my initial [July 10, 2026 e-mail](#) and in my two July 13, 2026 e-mails ([here](#) & [here](#)), to wit, “In re Center for Judicial Accountability, Inc. & Elena Ruth Sassower, on their own behalf & on behalf of the People of New York State & the Public Interest”**

Thank you.

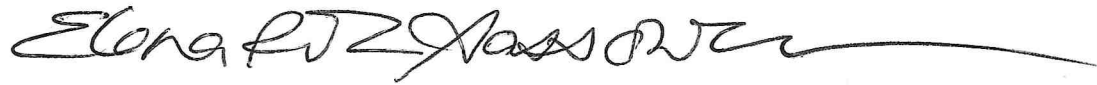
² I understood you to say that the [SDNY's listing of defendants on its docket for 25-CV-8370](#) was the model for the [Second Circuit's listing of respondents on its docket for 26-1905](#). However, the SDNY docket does NOT replace their names, as the Second Circuit's docket does, with the names of their parent entities.

³ The original October 8, 2025 verified complaint had 25 defendants, with THE FREE PRESS, being the last, followed, in italics, by the words, “*representative of other New York & national media*”. The [October 29, 2025 verified amended complaint](#) added 9 additional defendants, signifying this by * * * after THE FREE PRESS – and placing “*representative of other New York & national media*” after the now last 34th defendant.

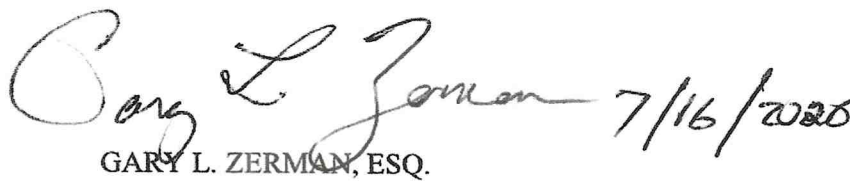
2nd Circuit Court of Appeals Case Manager Giovanniello

Page Three

July 16, 2026

A handwritten signature in black ink, appearing to read "Elena Ruth Sassower", with a long horizontal flourish extending to the right.

ELENA RUTH SASSOWER

A handwritten signature in black ink, appearing to read "Gary L. Zerman", followed by the date "7/16/2026".

GARY L. ZERMAN, ESQ.