

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Saturday, January 13, 2024 8:03 AM
To: 'AD3ClerksOffice'
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Subject: **Motion for Related Appeals to be Heard Together & to Prevent Fraud: CJA v. JCOPE, et al. (CV-23-0115) & Cuomo v. COELIG (CV-23-1778) -- or leave to file an amicus curiae submission**

TO: Appellate Division, Third Department Clerk's Office

cc: AG James' Office (Asst. Solicitor General Dustin Brockner, Deputy Solicitor General Jeffrey Lang, also Sr. Asst. Solicitor General Victor Paladino & Asst. Solicitor General Beezly Kiernan) Cuomo attorneys (James McGuire, Gregory Dubinsky, Zachary Kerner, Rita Glavin) Amici attorney (Richard Davis)

This follows my phone conversation with Julianne late yesterday afternoon (518-471-4777) regarding the two motions I would be making for a preference for the appeal in [CJA v. JCOPE, et al. \(CV-23-0115\)](#) so that it could be heard together with the appeal in [Cuomo v. COELIG \(CV-23-1778\)](#) by the same appellate panel. Despite my best efforts, I was unable to upload the motion for *Cuomo v. COELIG*, via "[Digital Submissions](#)", as Julianne explained was how I needed to do it. It took me a while to understand that, apparently, I needed to send an e-mail for a link, and to do so not from elena@judgewatch.org, but from a Microsoft email address – elena.sassower@outlook.com – which I did do. As it seems likely that the link or authorization will not be forthcoming until the Court next opens, on Tuesday, January 16th – too late to accommodate a motion returnable on Monday, January 22nd, with answering papers due on Friday, January 19th – I am sending the Court and the attorneys & amici in *Cuomo v. COELIG*, by the below links, the documents comprising the motion that I was unable to upload to *Cuomo v. COELIG*, all exhibits to my motion in *CJA v. JCOPE, et al.* that I successfully uploaded yesterday night at 11:40 pm (#26-#33).

[#28: January 12, 2024 Notice of Motion](#)

[#29: January 12, 2024 Moving Affidavit](#)

[#30: Exhibit A: CJA's July 8, 2022 complaint to JCOPE](#)

[#31: Exhibit B: CJA's October 6, 2022 supplement to complaint to JCOPE](#)

[#32: Exhibit C: CJA's March 29, 2023 testimony at COELIG hearing](#)

[#33: Exhibit D: CJA's October 2, 2023 complaint to JCOPE vs commissioners & staff.](#)

I anticipate making slight mostly non-substantive corrections on Tuesday, such as the addition of omitted “bookmarking” and links.

Thank you.

Elena Sassower,

Unrepresented individual petitioner-appellant in *CJA v. JCOPE, et al.*, “on behalf of the People of the State of New York & the Public Interest”.

914-421-1200