

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Tuesday, January 16, 2024 10:51 AM
To: 'ad3motions@nycourts.gov'; 'ad3tsu@nycourts.gov'; 'AD3ClerksOffice'
Cc: 'dustin.brockner@ag.ny.gov'; 'jlang@ag.ny.gov'; 'Victor.Paladino@ag.ny.gov'; 'Kiernan, Beezly'; 'jmcguire@hsgllp.com'; 'gdubinsky@hsgllp.com'; 'zkerner@hsgllp.com'; 'rglavin@glavinpllc.com'; 'richard.davis@rjdavislaw.com'
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 – Motions Department/Clerk’s Office

I left a voice mail about 15 minutes ago (518-471-4777) to advise that I uploaded, via “[Digital Submissions](#)”, my Jan 12th motion in [Cuomo v. COELIG \(CV-23-1778\)](#) for the granting of a preference to the appeal in [CJA v. JCOPE, et al. \(CV-23-0115\)](#), so that these two related appeals can be heard together & to prevent fraud. The uploaded documents consist of the notice of motion, my moving affidavit, and the four exhibits to the moving affidavit, which I had discussed a short time earlier with Julianne and her authorization to upload, so that the *Cuomo v. COELIG* parties and *amici* may be heard with respect to the requested relief.

Below is my notice to the attorneys, sent on January 13th. The documents I have today uploaded make only a handful of non-substantive typographic corrections, essentially typos and punctuation, to what I had furnished on January 13th.

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

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>

Sent: Saturday, January 13, 2024 8:03 AM

To: 'AD3ClerksOffice' <AD3ClerksOffice@nycourts.gov>

Cc: 'dustin.brockner@ag.ny.gov' <dustin.brockner@ag.ny.gov>; 'jlang@ag.ny.gov' <jlang@ag.ny.gov>; 'Victor.Paladino@ag.ny.gov' <Victor.Paladino@ag.ny.gov>; 'Kiernan, Beezly' <Beezly.Kiernan@ag.ny.gov>; 'jmcguire@hsgllp.com' <jmcguire@hsgllp.com>; 'gdubinsky@hsgllp.com' <gdubinsky@hsgllp.com>; 'zkerner@hsgllp.com' <zkerner@hsgllp.com>; 'rglavin@glavinpllc.com' <rglavin@glavinpllc.com>; 'richard.davis@rjdavislaw.com' <richard.davis@rjdavislaw.com>

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