

SUPREME COURT OF STATE OF NEW YORK
APPELLATE DIVISION, THIRD DEPARTMENT

----- x
ANDREW M. CUOMO,

Plaintiff-Respondent,

AD Docket #: CV-23-1778

-against-

January 12, 2024

**NOTICE OF MOTION
for Appeals to be Heard Together,
or for Leave to File *Amicus Curiae*
Submission to Prevent Fraud**

NEW YORK STATE COMMISSION ON ETHICS
AND LOBBYING IN GOVERNMENT,

Defendant-Appellant.
-----x

PLEASE TAKE NOTICE that upon the accompanying affidavit of Elena Ruth Sassower, individual petitioner-appellant in *Center for Judicial Accountability, et al. v. JCOPE, et al.* (CV-23-0115), sworn to on January 12, 2024, Elena Ruth Sassower will make a motion before this Court at the Robert Abrams Building for Law and Justice on State Street, Albany, New York 12223, on Monday, January 22, 2024, or as soon thereafter as the parties or their counsel can be heard, for an order:

- (1) granting a preference to the appeal in *Center for Judicial Accountability, et al. v. JCOPE, et al.* (CV-23-0115) so that it can be heard together with the appeal herein, by the same appellate panel, as both appeals pertain to the constitutionality of Chapter 56, Part QQ, of the Laws of 2022: “the ethics commission reform act of 2022” – and to prevent fraud; and, if denied:
- (2) granting Elena Ruth Sassower leave to file her moving affidavit, with exhibits, as an *amicus curiae* submission for the same reasons as mandate granting the preference;
- (3) granting such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR §2214(b), answering papers, if any, are to be served on Elena Ruth Sassower on January 19, 2024.



ELENA RUTH SASSOWER, unrepresented petitioner-appellant in
CJA v. JCOPE, et al., individually & as Director of the Center for Judicial
Accountability, Inc., and on behalf of the People of the State of New York &
the Public Interest

10 Stewart Place, Apartment 2D-E
White Plains, New York 10603
914-421-1200
elena@judgewatch.org

TO: Attorney for Defendant-Appellant COELIG:
Attorney General Letitia James
ATT: Assistant Solicitor General Dustin Brockner
Attorneys for Plaintiff-Respondent Cuomo:
Howell, Shuster & Goldberg, LLP
Rita M. Glavin, Esq.

Dated: White Plains, New York
January 12, 2024