

Center for Judicial Accountability

From: Center for Judicial Accountability <elena@judgewatch.org>
Sent: Thursday, March 26, 2015 4:47 PM
To: adrienne.kerwin@ag.ny.gov
Subject: Citizen-Taxpayer Action: CJA v. Cuomo (#1788-14) -- Verified Supplemental Complaint pursuant to CPLR 3025(b)

Here's link to webpage posting the verified supplemental complaint: <http://www.judgewatch.org/web-pages/searching-nys/budget-2014-2015/menu-budget-reform.htm>

From: Center for Judicial Accountability [<mailto:elena@judgewatch.org>]
Sent: Thursday, March 26, 2015 4:26 PM
To: adrienne.kerwin@ag.ny.gov
Subject: Citizen-Taxpayer Action: CJA v. Cuomo (#1788-14) -- Verified Supplemental Complaint pursuant to CPLR 3025(b)

Dear Ms. Kerwin,

This follows up my voice mail message for you a short time ago and our prior phone conversations this week.

As we have now reached the end of this fiscal year, attached is my now completed draft of plaintiffs' Verified Supplemental Complaint "setting forth...subsequent transactions or occurrences" encompassing the upcoming fiscal year. As discussed, in the interest of judicial economy and expedition, I am requesting your stipulated consent, pursuant to CPLR 3025(b), so as to obviate the necessity of a motion for leave, which "shall be freely given".

CPLR 3025(b):

"Amendments and supplemental pleadings by leave. A party may amend his or her pleading, or supplement it by setting forth additional or subsequent transactions or occurrences, at any time by leave of court or by stipulation of all parties. Leave shall be freely given upon such terms as may be just including the granting of costs and continuances. Any motion to amend or supplement pleadings shall be accompanied by the proposed amended or supplemental pleading clearly showing the changes or additions to be made to the pleading."

Thank you.

Elena Sassower, Plaintiff *Pro Se*,

Acting on her own behalf & on behalf of the People of the State of NY & the Public Interest
914-421-1200