

COURT OF APPEALS
STATE OF NEW YORK

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Center for Judicial Accountability, et. al. v. JCOPE, et al.
APL 2024-150 – Appeal of Right
NYS Constitution Article VI, §3(b)(1); CPLR §5601(b)(1)

APL 2024-150
APL 2024-149/175
Mo. No. 2025-25

Center for Judicial Accountability, et al. v.
Commission on Legislative, Judicial and Executive Compensation...
Wilson, Zayas, et al.
APL 2024-149; APL 2024-175 – Direct Appeal of Right
NYS Constitution, Article VI, §3(b)(2)

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**NOTICE OF MOTION
REARGUMENT/TRANSFER-CERTIFICATION**

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Upon the annexed April 17, 2025 affirmation of the unrepresented individual appellant, Elena Ruth Sassower, the exhibits annexed thereto, and upon all the papers and proceedings heretofore had, the unrepresented appellants will move this Court at 20 Eagle Street, Albany, New York 12207 on Monday, May 5, 2025 at 10:00 a.m. or as soon thereafter as respondents can be heard for an order:

1. Pursuant to [CPLR §2221](#) and [this Court’s Rule 500.24](#), granting reargument of the Court’s March 18, 2025 Order because it is jurisdictionally void and unconstitutional inasmuch as the six associate judges purporting to have rendered it:
 - (a) each “overlooked” their duty pursuant to [§100.3E of the Chief Administrator’s Rules Governing Judicial Conduct](#) to disqualify themselves based on their financial and other interests, divesting them of jurisdiction pursuant to [Judiciary Law §14](#) and the Court’s interpretive

caselaw, [Oakley v. Aspinwall](#), 3 NY 547 (1850), [Wilcox v. Royal Arcanum](#), 210 NY 370 (1914);

(b) each manifested actual bias, born of their undisclosed interests and relationships, by disregarding and concealing all the facts, law, and legal argument that appellants furnished in support of their appeals of right and threshold December 23, 2024 motion for enforcement of [this Court's Rule 500.1\(a\)](#) against Respondent Attorney General Letitia James, Solicitor General Barbara Underwood, and other culpable attorney staff;

2. Pursuant to Article IV, §4 of the United States Constitution, transferring the appeals and December 23, 2024 motion to the Second Circuit Court of Appeals or the United States Supreme Court – or to certify the jurisdictional question;
3. Granting such other and granting such other and further relief as may be just and proper, including \$500 costs pursuant to [CPLR §8204](#).

PLEASE TAKE FURTHER NOTICE that pursuant to [Court Rule 500.21\(c\)](#), opposition papers, with proof of service, are required to be filed with the Court on or before the May 5, 2025 return date.

s/

ELENA RUTH SASSOWER, unrepresented individual appellant,
Director of the Center for Judicial Accountability, Inc. (CJA), on her own
behalf, on CJA's behalf, and on behalf of the People of the State of New York
& the Public Interest

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Dated: April 17, 2025
White Plains, New York

TO: New York Attorney General Letitia James
Solicitor General Barbara Underwood
Deputy Solicitor General Andrea Oser
Assistant Solicitor General Beezly Kiernan