

IN BRIEF

Warren Stands by Remarks On Binance CEO, Dismisses Legal Threat

Sen. Elizabeth Warren pushed back on Sunday against claims from Binance founder Changpeng "CZ" Zhao that she defamed him following his pardon from President Donald J. Trump, arguing her social media comments were "true in all respects" and protected by law.



Sen. Elizabeth Warren

Ben Stafford, a partner at Elias Law Group in Washington, D.C., writing on Warren's behalf, said any defamation claim would fail because Zhao is a public figure and

Warren's post was made in the course of her official duties as a U.S. senator. He added that the statement preceded Warren's introduction of a Senate resolution condemning Zhao's pardon.

"Even presuming that absolute immunity would not bar such a defamation claim, Mr. Zhao would need to establish the necessary elements," Stafford wrote in the letter. "A public figure such as Mr. Zhao cannot prevail on a defamation claim without presenting evidence that the defendant published a false statement of fact with actual malice. Here, as explained below, Senator Warren's statement is completely accurate."

Teresa Goody Guillén, a partner at Baker & Hostetler who represents Zhao, did not respond to a request for comment. But she has previously noted on X that the Constitution's Speech or Debate Clause shields members of Congress from lawsuits only for statements made within the legislative chambers or committees, not necessarily on social media.

The controversy dates back to Trump pardoning Zhao, who was convicted over a single count of violating the Bank

Secrecy Act and failing to maintain proper anti-money laundering controls as the CEO of Binance, the company he founded. Zhao was sentenced to four months in prison, and later received a presidential pardon from Trump on Oct. 22. "CZ pleaded guilty to a criminal money laundering charge and was sentenced to prison," Warren wrote on X on Oct. 23. "But then he financed President Trump's stablecoin and lobbied for a pardon. Today, he got it. If Congress does not stop this kind of corruption, it owns it."

In response, Zhao's counsel sent a Oct. 28 letter to Warren alleging that the post was defamatory because the cryptocurrency titan "pleaded guilty to a criminal money laundering charge," rather than a failure-to-implement-AML-controls violation.

Warren's legal team dismissed the distinction as irrelevant, pointing to Zhao pleading guilty under a statute titled "Criminal Penalties" in the Bank Secrecy Act, and stated that she read that the Justice Department and multiple media outlets referred to the case as involving money laundering violations.

Warren's legal team also cited her responsibilities as a senator, in which she is tasked with oversight of the executive branch, and said that she felt compelled in her official capacity to post the news on social media to "educate the public" and lay the groundwork for potential legislation. Warren argued that she is protected by absolute legislative immunity because, that same day, she introduced a resolution condemning the pardon.

Even if there were minor inaccuracies, they do not amount to falsity as long as "the gist" of the statement is true, Warren's legal team argued. "Moreover," Warren's legal team added, "even outright falsities regarding public figures are not actionable unless made with actual malice; with knowledge of falsity or reckless disregard for the truth or falsity of a statement."

Bruce S. Rosen, a partner at Pashman Stein Walder Hayden in New Jersey who specializes in defamation law and is not involved in the matter, noted that there is a "huge line of cases" that discuss the concept of substantial truth.

He added, "And this definitely fits in."

—Michael A. Mora
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DECISIONS OF INTEREST

First Department

LITIGATION: Court dismisses petition challenging breach of collective bargaining agreement. *Archer v. MTA, Supreme Court, New York*.

CONTRACTS LAW: Partial summary judgment granted on breach of contract claim. *Brownell v. Harris, Supreme Court, New York*.

CONTRACTS LAW: Motion to dismiss granted; no contract between plaintiff and defendant. *King Steel Iron Work Corp. v. Xenon Constr. Corp., Supreme Court, New York*.

CONTRACTUAL DISPUTES: Dismissal granted; agreement refuted causes of action. *Harris v. Dream Volunteers, Supreme Court New York*.

FAMILY LAW: Motion for waiver costs granted in matrimonial action. *Y.H. v. I.C., Supreme Court, Westchester*.

PERSONAL INJURY: Defendant's summary judgment granted; storm-in-progress rule invoked. *Leon v. Pasarelli, Supreme Court, Westchester*.

U.S. Courts

WHITE COLLAR CRIME: Second Circuit vacates CEO's securities fraud convictions as barred by double jeopardy. *United States v. Cole, 2d Cir.*

LABOR LAW: Fired plaintiff is entitled to a jury trial on front pay damages under NYLL §740. *Applegate v. The Mount Sinai Hosp., SDNY*.

ANTITRUST: Court again denies reconsideration, finds cardholders lack Cartwright Act standing. *Palladino v. JPMorgan Chase & Co., EDNY*.

CLASS ACTIONS: Court dismisses class action against Amazon after finding plaintiff lacks standing. *Won v. Amazon.com Serv. EDNY*.

CRIMINAL LAW: Court suppresses defendant's statements after clear invocation of right to remain silent. *United States v. Lubna, EDNY*.

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'Facially Invalid': Judge Strikes Down Long Island Zoning Law Controlling Places Of Worship as Unconstitutional

BY EMILY SAUL

A FEDERAL judge in New York has declared a Long Island village zoning law governing places of worship "facially invalid" and "discriminatory" under the U.S. Constitution.

The decision, from U.S. District Court Judge Gary Brown of the Eastern District of New York, comes nearly 20 years after a Lubavitch religious organization and Rabbi Aaron Kornikov sought to build a Chabad center in Old Westbury, New York and were foiled by the restrictive nature of a zoning law.

The Village's Places of Worship Law was passed in 2001 to help the Village retain its historical charm, per court papers. But the law is clearly discriminatory and violates the Free Exercise Clause of the First Amendment, the judge found.

"Under defendant's zoning code, 'a pit of manure may be located closer to the property line than a place of worship,'" the judge wrote, citing an "undisputed" fact found



Judge Brown

in the case's voluminous record.

Brown noted that, while the Village argues the Chabad center could cause "traffic, parking, noise [and] crowds," the site has not been known for its tranquility.

"The Lubavitch site is situated across from a state government heavy machinery yard and is a stone's throw away from the Northern State Parkway and the infamous Long Island Expressway, the area's busiest roadway that, at times, becomes the most congested traffic artery in the nation," wrote the judge.

The decision also calls out counsel for the Village of Old Westbury, noting the "only meritorious motion" before the court is from Lubavitch of Old Westbury.

"Much of the motion practice blithely ignores the relevant, if not dispositive, litigative history of this action, eliding determinations made by this Court," Brown wrote. One argument from defendant he said "stray[ed] into the realm of improper and obstructive."

The Village is represented by Joseph Clasen, Janet Klyan, John Peluso and Evan See. » Page 7

Online

► The Eastern District decision is posted at nylj.com.



RYLAND WEST/ALM



COURTESY PHOTO

New York State Attorney General Letitia James is arguing that the Justice Department cannot enforce subpoenas from acting U.S. Attorney John Sarcone III of the Northern District of New York.

US Judge Unseals AG's Motion To Quash Subpoenas From Acting US Attorney in Albany

BY BRIAN LEE

THE U.S. Department of Justice on Monday filed its omnibus opposition to the office of the New York State Attorney General's motion to quash investigative subpoenas from Acting U.S. Attorney John Sarcone III of the Northern District of New York.

The federal government's counter to the AG's motion said

New York Attorney General Letitia James filed lawsuits against President Donald Trump and the National Rifle Association that fulfilled "repeated" promises she made before she took office.

James had pledged during her campaign to investigate, prosecute and sue the NRA and Trump, with her stated goal being to "take down that organization," and "take on" Trump's "illegitimate" » Page 4

Western NY Judge Resigns After Invoking Office in Attempt To Avoid Traffic Ticket

BY BRIAN LEE

A WESTERN New York jurist has resigned amid a probe that he tried to invoke his judicial office to avoid being issued tickets for unlicensed driving, a state watchdog said Monday.

Former Clarkson Town Court Justice Ian Penders, an attorney since 2014, quit the bench amid



Former Clarkson Town Court Justice Ian Penders

NYSBA President Speaks Out on Acting US Attorneys, Criticizing White House's End Run Around Senate

BY BRIAN LEE

THE PRESIDENT of the New York State Bar Association criticized President Donald Trump's administration on Friday for its recent history of installing acting U.S. attorneys, rather than going through the process of permanent appointments who are vetted by the Senate.

During a podcast posted on NYSBA's YouTube channel, association President Kathleen Sweet said the federal administration's actions breach the separation-of-powers doctrine.

During the interview with NYSBA general counsel and former president David Miranda, Sweet



COURTESY PHOTO

Kathleen Sweet, president of the New York State Bar Association, is no stranger to being vetted by Congress.

contrasted the administration's current tactics with the extensive vetting process she went through for a lifetime federal judgeship in the U.S. District Court for the Western District of New York in 2016.

Former President Barack Obama's nomination of Sweet was unanimously confirmed by the Senate Judiciary Committee, but was later blocked by then-Senate Majority Leader Mitch McConnell.

Sweet said the vetting process she went through included investigations by and interviews with the FBI, White House counsel, and American Bar Association.

A partner at the law firm of Gibson, McKissick & Crosby, LLP in Buffalo, Sweet recalled that investigators visited the firm to » Page 4

Experts: UMG's Settlement With AI Firm May Set Precedent for Copyright Litigation, Licensing Deals

BY KAT BLACK

The world's largest music label, Universal Music Group, has announced it reached a settlement with artificial intelligence music platform Udio in a copyright infringement suit—a decision that attorneys specializing in AI, intellectual property and entertainment law say may prove precedential down the line as artists in both the entertainment and publishing industries continue to navigate the question of fair use in pending litigation against AI firms.

UMG, which represents artists such as Taylor Swift, Drake, Billie Eilish and Kendrick » Page 4



Universal Music Group, Sony Music, and Warner Records sued AI platforms for copyright infringement last year.

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by Theodore A. Keyes

Online

Court Calendars

Civil and Supreme Court calendars for New York and surrounding counties are now **available weeks in advance** at nylj.com. Search cases by county, index, judge or party name. Important Part information, including addresses, phone numbers and courtrooms are updated daily. **Only at nylj.com.**

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Are Law Practice Ownership Boundaries Vanishing? Corporate Immigration Work Offers Clues

BY JOHN CAMPISI

Private equity-backed global mobility services outfit Vialto Partners' acquisition this week of a large team of immigration legal professionals from Seyfarth Shaw to bolster its affiliated law firm is the latest indication that corporate immigration work—perhaps more than any other practice—offers a road map for dissolving the barriers between traditional legal service providers and nonlegal entities.

Previously in the space, corporate immigration law firm Berry Appleman & Leiden sold its non-U.S. operations to Big Four accounting firm Deloitte in 2018 and in the same year, Am Law 100 immigration law giant Fragomen announced a strategic alliance with PwC. Now Vialto, which was spun off from PwC in 2022 and is currently controlled by private equity giant Clayton Dubilier & Rice, is stepping up its legal capabilities through its Vialto Law entity.

At this point, the exact nature of the relationship between the two



Chris Batz, founder of Columbus Street

ership geared towards industry and towards clients and the client experience is kind of driving this."

Immigration at the Vanguard

Batz, speaking in general terms since he's unaware of Vialto's specific operations, said it makes sense for such a company to create a law firm entity, particularly one focused on corporate immigration work, because that type of work is often complex and laborious.

"What we're seeing here is an evolution," Batz said of the corporate immigration sphere. "You have some interesting things going on, like Fragomen, the largest firm in the United States for corporate immigration ... effectively operating as two different firms."

Fragomen currently operates as two separate limited liability partnerships, Fragomen, Del Rey, Bernsen & Loewy and Fragomen Global, according to the firm's website.

Another legal industry insider, who spoke on the condition of anonymity because of his ties to the legal community, noted that

a significant amount of corporate immigration work makes sense being handled outside of a law firm environment.

"These practices are volume practices within immigration," the source said, calling them "super paper-heavy" and "highly leveraged."

Flat fees and low margins are also part of the picture, the source added, explaining that a large portion of immigration processing doesn't typically entail the practice of law, and companies are finding ways to do this type of work administratively.

"The Seyfarths, the Ogletrees, the Fragomens, they all have upper-level work, more important work ... that can bear higher rates than the vast majority of commodity work," he said.

But for that commodity work, the backing of private equity allows these operations to have the capital base to scale on the technology and geographic reach, so it makes sense in the immigration context.

"These are highly complex, integrated solutions," he said. "These

global mobility programs are ones where ... they're purporting to deal with all the issues around comp and Social Security and immigration. All of this is part of the package."

But this playbook extends beyond immigration work.

"I've seen and heard about more and more deals like this, both some that have come to fruition, some that seem to be in the works, (involving) these managed services companies, like Vialto, also some of your accounting firms that are outside the Big Four accounting and consulting firms," said Brad Blickstein, principal of the Blickstein Group. "I think they've long ago realized that legal expertise should be part of their full-service offering, and now, since a few years ago, with alternative structures, etc."

While Blickstein doesn't know the specifics of how Vialto is structured, he said creating the law firm entity is a "smart play."

"It doesn't make sense to not offer legal services as part of your offerings from a business standpoint," Blickstein said.

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Outside Capital for Law Firm Talent Acquisition? A New Wave of PE-Funded Laterals May Be on the Horizon

BY JOHN CAMPISI

PRIVATE equity companies, which have successfully made inroads into the legal industry, are now considering funding lateral partner moves to bring top rainmakers to midtier firms that might not otherwise have the compensation flexibility to land top names, experts say.

Private capital has thus far been used to invest directly in law firms in jurisdictions, such as Arizona and in the United Kingdom, that now permit nonlawyer ownership of firms for purposes such as technology purchasing and footprint expansion. But the practice of using private dollars specifically to help firms acquire talent has yet to become widespread.

While the concept remains somewhat speculative in nature, industry observers say they would not be surprised if this picks up steam in the coming months and years, as more PE firms seek to secure a larger share of the legal market.

"Private equity has already turned every corner of the legal industry into an investable asset—from tech to litigation finance—so talent was bound to be next," said Howard Rosenberg, partner and head of talent intelligence and acquisitions for Baretz+Brunelle.

"For firms that can't afford to buy rainmakers outright, PE could be the bridge. It's a sign of how the business of law is evolving—capital is chasing capability."

Rosenberg likened lawyers to free agents in the sports industry, noting they can move wherever they want without the burden of noncompete clauses, and that shared equity could be one of the only things that keep top performers anchored to law firms.

"As laterals become more mobile and the war for talent intensifies, PE could step in to finance not just firms, but the people who drive their value," he said. "For some midtier firms, that might be the only way to stay competitive. You can finance a lateral move, but if you're smart, you'll finance the commitment that keeps them from leaving."

Increased Share of the Pie

It's no surprise to industry observers that private equity is eyeing up an increased share of the pie when it comes to legal, given its success in other industries like health care, but at the same time, "tapping into private capital to land those whales, those huge rainmakers, it's a little bit more of a complex question," said Rob Conrad, a recruiter with Major, Lindsey & Africa.

When you think about firms at the "top of the heap," such as Kirkland & Ellis, Latham & Watkins and Paul, Weiss, Rifkind, Wharton & Garrison, the commonality is that they share excellent brand recognition and possess "armies and deep benches" of some of the best lawyers in the country, Conrad said. But they also have compensation flexibility, meaning they may not need private dollars for talent acquisition.

"Management can write really big checks for the top-tier talent that they want, and on occasion dole out multiyear guarantees as well, so it gives a huge financial incentive for the top rainmakers to join them," Conrad said. "It's partially why those firms are winning the war for lateral talent. The platforms are really great, but it's also that they've got a lot of capital that they can throw at these partners to bring them over."

Second-tier firms lower in the Am Law rankings, however, don't necessarily have the profitability or capital on hand to recruit top talent, making them more attractive to private equity companies looking to fund lateral moves, he said.

"Now, what if you could get access to that capital?" Conrad said. "I think you would see a lot of firms jump at that if they could."

Still, some legal industry insiders say some kinks may need to

be worked out before this concept becomes mainstream, just as they had to be worked out when private equity started eyeing up other forms of law firm investment.

"From the firms' perspective, I'm wondering how much firms really need financing as opposed to insurance. The problem with the lateral market is bringing someone on and then finding out one or two years later that they have failed to perform," said Merrick Benn, chair and CEO of Womble Bond Dickinson.

"That risk seems to be more consequential than whatever the initial signing bonus or headhunter costs that that brought them over."

Benn said like other private equity involvement in the legal industry, using private capital for talent acquisition could run into roadblocks—at least in the United States—when it comes to investment.

"The firm would have to disclose its fee splits with the clients, and I can imagine some clients feeling a little weird about their fees and/or a perception that their confidentiality would be going outside of the law firm," Benn said. "As interesting as the concept is, I do question how quickly this can/will play out in the U.S. given the current landscape."

At the same time, having a private equity company that could develop a data-driven model, such as aggregating lateral hiring data across several firms, could potentially

provide a service to law firms by helping them to vet incoming laterals and giving firms time to make smarter business decisions, he said.

"In working with the PE to purchase the insurance, it would probably also force firms to be more disciplined in their screening process," Benn said.

Clients Drive the Ship

Other experts note that clients themselves may not always be on board with their counsel lateralizing to a second-tier firm through this type of PE-backed poaching. While private dollars may help some of those firms tap top talent, clients may want their lawyers to stay put in the more elite firms, they say.

"I think that an issue on top of [this] is, is the rainmaker going to be comfortable going there?" said

Conrad, of Major Lindsey. "Are his or her clients going to be comfortable with them being on that platform? Are you going to get the type of ancillary support and the expertise that you need? There are just so many other issues other than just making that money and you want to make sure your clients are getting the best possible service across the platform and that you're taking care of them and that they're comfortable because if they don't follow you, that's a big problem."

Nevertheless, experts do seem to view the upside in this possible trend, saying that private capital for talent acquisition is merely another way to help cash-strapped law firms whose cash flows to the partners at the end of the year, leaving very little capital to fund everything from technology and footprint expansion to real estate and talent.

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Top 20 Law School Degree Still Carries Caché, but Career-Long Pay Premium Is Fading

BY TRUDY KNOCKLESS

A DEGREE from a top-tier law school may open doors early in a legal career, but it's no longer a ticket to long-term success, in the eyes of many in-house leaders.

A new report from the Association of Corporate Counsel highlights the enduring—but narrowing—pay gap between attorneys who graduate from top 20 law schools and those who don't. According to the 2025 Law Department Compensation Survey, junior-level attorneys from top schools earn up to a 39% higher base salary and 36% higher total compensation compared to peers from other institutions. But by the time lawyers reach senior ranks, that edge flattens out.

"What that suggests is that performance, business acumen, experience and leadership skills increasingly define success more than pedigree," Veta Richardson, outgoing CEO of the ACC, told Law.com. "At that point, where you went to law school really isn't part of the conversation."

The findings come at a time



Yale and Stanford law schools tied for No. 1 in U.S. News & World Report's latest rankings.

corporate legal departments are reassessing long-held hiring norms—especially the emphasis on elite credentials. The 2025 survey, based on compensation data from more than 2,000 in-house lawyers across many industries, offers a detailed look at how factors like education, experience and geography influence pay.

While law school pedigree remains a strong early indicator of higher compensation, it's just one part of the larger story. "Each person has an opportunity to write their own story, and that remains the case," Richardson said.

And the numbers back her up. While the compensation gap is wide at the attorney level, it shrinks

significantly by the time lawyers become deputy general counsel or general counsel. This trend reflects what Richardson called a broader truth in the profession: "Smart lawyers can be found everywhere—hard-working lawyers, lawyers that have political savvy, good judgment and good interpersonal skills."

According to the ACC, 77% of in-house lawyers come from law firm backgrounds, but nearly one in six transitioned directly from law school. Another 15% entered from government. The takeaway? There's no single, dominant path into corporate law departments.

From the ACC's perspective, that's a positive development—and one legal departments should continue to build on.

"I was part of hiring teams when I worked in-house myself," said Richardson. "I don't recall any of those discussions being subject to what law school [lawyers] attended. What you're impressed by is the sum of someone's experience and what they bring to the table holistically, not just academically."

The survey results feed into a

larger industry conversation about "pedigree bias"—the notion that overemphasizing law school rank may hinder efforts to build diverse, innovative and practically minded legal teams. It's a conversation in-house legal departments have a unique opportunity to lead by example.

To counter that bias, Richardson said, companies can broaden their evaluation criteria to focus on competencies like ethical judgment, adaptability, and communication.

"I've heard countless times from general counsel that they don't necessarily need the best-pedigreed or highest-ranking lawyer. What they need is someone who can communicate about the law, who can problem-solve on their feet," she said. "Sometimes, if you're too academically oriented, you fizz out because you haven't figured out how to talk about law with people who are not lawyers."

Richardson, who is an adjunct professor at Georgetown Law, said her own experience in the classroom reinforces what the data shows: "Talent is not restricted to one school or one pedigree or one set of rankings."

As legal departments navigate a rapidly changing environment—including the integration of AI tools and growing pressure to demonstrate value—many are reevaluating what qualifications matter most.

"Law departments are looking for lawyers who also bring technology skills in addition to law," Richardson said. "People who understand finance and have the ability to communicate with business clients, and who have a level of business savvy and good interpersonal skills for judgment."

For legal professionals coming from non-elite schools—or from nontraditional backgrounds—that shift may open more doors. For employers, it may mean moving beyond the prestige mindset to build stronger, more agile teams.

"When you have accomplishments that you can speak of that go well beyond the academic credential, that's what really starts to define your career," Richardson said.

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Expert Analysis

INSURANCE LAW

Eastern District Ruling Clarifies Bonds vs. Liability Insurance

While fidelity bonds are referred to as bonds, generally speaking, they function as insurance for direct loss incurred due to employee theft or dishonesty. The scope of coverage under such bonds is limited to the employer's direct first-party loss and does not extend to liability for third-party claims. This limitation, however, does not always dissuade litigants from seeking to recover loss incurred due to third-party claims that arise from an employee's fraudulent behavior.

In *Cadaret, Grant & Co., Inc. v. Great American Insurance Co.*, the District Court for the Eastern District of New York was recently faced with such a claim. A securities broker dealer sought to recover under a fidelity bond for loss incurred to pay third-parties arising out of a fraudulent scheme carried out by its representative.

The Eastern District rejected the plaintiff bondholder's claim, ruling in favor of the defendant insurer on the grounds that the fidelity bond did not extend coverage beyond direct first-party loss. *Cadaret, Grant & Co., Inc. v. Great American Insurance Co.*, No. 21-CIV-6665, 2025 WL 2711405 (E.D.N.Y. September 23, 2025).

The Fraudulent Scheme

The fraudulent scheme at the center of *Cadaret, Grant & Co.* was carried out by a registered representative licensed to sell securities. According to the allegations of an SEC complaint, the representative "defrauded at least nine retail investors of approximately \$8 million by soliciting and selling... securities using false and misleading statements... in a Ponzi scheme involving a shell company..."

The representative was indicted for securities fraud and other related criminal activity.

According to *Cadaret, Grant & Co.* (Cadaret), in furtherance of the fraudulent scheme, the representative convinced clients to "(1) liqui-

THEODORE A. KEYES is a partner at McDermott Will & Schulte.



By
Theodore A.
Keyes

date funds in their Cadaret brokerage accounts, (2) wire funds from their Cadaret brokerage accounts to their personal bank accounts, and (3) write checks from their personal accounts to sham companies controlled by [the representative]."

Following discovery of the scheme, nine Cadaret clients filed claims against Cadaret in FINRA arbitrations seeking to recover their losses. Although Cadaret disputed its legal liability, it resolved all of the clients' claims through settlement for a total payment of approximately \$3.3 million.

The trial court had ruled in favor of the plaintiff insurers, finding that the bondholder could not recover amounts paid for the third-party settlements because the scope of coverage under the bonds was limited to direct loss.

Cadaret sought coverage for the settlement payments under its fidelity bond and Great American denied coverage. Cadaret then filed a lawsuit against Great American alleging breach of contract and seeking a declaratory judgment holding that its losses were covered by the bond.

The Eastern District Looks to A First Department Ruling

On May 10, 2024, Plaintiff Cadaret moved for summary judgment on liability. Defendant Great American opposed the motion and filed a cross-motion for summary judgment. The Eastern District ruled in favor of Great American, granting summary judgment because

Cadaret's losses were not direct loss under the terms of the fidelity bond.

As an initial matter, the Eastern District explained that the fidelity bond at issue covered "loss resulting directly from dishonest or fraudulent acts committed by an employee." But like other fidelity bonds, it did not extend coverage to losses resulting from liability for third-party settlements.

In support of its ruling, the Eastern District relied, in part, on the First Department decision in *Aetna Cas. & Sur. Co. v. Kidder, Peabody & Co.*

That case involved the illegal disclosure of insider information by a bondholder's employee which resulted in significant losses to third parties who in turn sued the bondholder for damages. The bondholder settled the third-party claims and then submitted a proof of loss seeking recovery under its fidelity bond. *Aetna Cas. & Sur. Co. v. Kidder, Peabody & Co.*, 246 A.D.2d 202 (First Dept. Aug. 6, 1998).

The trial court had ruled in favor of the plaintiff insurers, finding that the bondholder could not recover amounts paid for the third-party settlements because the scope of coverage under the bonds was limited to direct loss.

On appeal, the First Department affirmed, explaining that the loss "arises in part from a settlement with third parties, but the settlement was not the direct result of the employee's dishonest conduct; the employee's dishonesty only caused pricing irregularities in the stock, which, themselves, caused losses to the customers, which then led to litigation concluding in settlement."

The First Department also pointed out that the logical extension of the bondholder's argument that a settlement with a third-party under the facts presented could be considered direct loss would create the potential for "almost any loss to the insureds, not initially direct to the insureds, to become a direct loss..."

The Eastern District Rejects the Claim

The Eastern District determined that the Cadaret claim involved a loss similar to that at [» Page 6](#)

PRODUCTS LIABILITY

Trump Tariffs in the Supreme Court

This Wednesday the U.S. Supreme Court will hear arguments over the legality of Trump's controversial tariffs. It's a momentous case, probably an instant landmark. It gives the court an opportunity to repair its diminished reputation as a willing enabler of Trump's lawlessness.

As we know, the court has already granted Trump absolute immunity from accountability for his misfeasance; authorized his lawless dismemberment of federal agencies and civil service protections; curbed the power of federal courts to reign in Trump's despotic excesses; endorsed immigration agents' use of racial profiling in rounding up migrants; and employed the "Shadow Docket" gambit to hide its perverse rulings.

Now, in the tariff case, the court is faced again with the choice between further obliterating restraints on the president's power or summoning the courage to tell Trump he has gone too far.

In *Donald J. Trump v. V.O.S. Selections, Inc.*, the Justices will decide whether a president, for the first time in American history, has the power to impose massive, unlimited, and ever-changing tariffs on U.S. imports of \$4 trillion of goods annually, representing 14 percent of the U.S. economy, for an indefinite period of time.

Citing the International Emergency Economic Powers Act of 1977 (IEEPA), Trump claims that Congress gave him the power to declare an economic emergency necessitating his tariffs and given that emergency, that his actions are not even subject to Supreme Court review.

In any other time, and with any other court, the case would be a slam-dunk against Trump's claim of presidential omnipotence. But today, with a majority of the Justices squarely in Trump's orbit and fearful of his wrath, it's anybody's guess what the court will do.

Consider the merits. Tariffs are taxes. The Constitution gives Congress the exclusive power "To lay and collect Taxes, Duties,



By
Bennett
Gershman

Imposts and Excises" (Art. I, §8, cl. 1). Simply put, the power of the purse, including the power to tax, belongs not to the president but to Congress.

Although Congress has delegated law-making powers to the executive branch, the executive must point to "clear congressional authorization" for the authority it claims. *West Virginia v. Environmental Protection Agency* (2022). So, if Congress intended to delegate to the president the power to impose taxes, such as tariffs, it would need to do so clearly and unambiguously.

Now, in the tariff case, the court is faced again with the choice between further obliterating restraints on the president's power or summoning the courage to tell Trump he has gone too far.

But there is no plausible way to read IEEPA to argue that Congress intended to confer on a president the sweeping power to impose massive tariffs affecting a vast sector of U.S. and international economies for unlimited duration.

As the Federal Circuit Court of Appeals concluded, in granting a president the authority to "regulate importation" after declaration of national emergency, Congress did not authorize the president to issue presidential orders imposing trafficking tariffs and reciprocal tariffs of unlimited duration on nearly all goods from nearly every country in the world. *V.O.S. Selections, Inc. v. Trump*, 149 F.4th 1372 (2025).

Indeed, Trump's claim that an emergency exists is belied by the facts. Trump claimed when he took office that America was a "dead country" economically. But that assertion was false. The Economic Policy Institute said that Trump

"will inherit unquestionably the strongest economy for an incoming administration since the George W. Bush administration."

According to the Washington Center for Equitable Growth, "the U.S. economy in the later part of 2024 was in a strong position. Growth in output, measured by real GDP, and nonfarm productivity were above estimates of trend, employment levels were at near-historic highs, and real wage and income growth was positive."

Trump's argument for his tariffs was that the U.S. has a "trade deficit" and that constituted his so-called emergency. But the trade deficit has been ongoing for well over fifty years. Indeed, the U.S. has had trade deficits for most of its existence. And Trump repeatedly described the trade deficit as "persistent" for more than half a century.

The IEEPA's reference to emergencies expressly limits a president's power to "unusual" and "extraordinary" threats to the economy, and "cannot be used for any other purpose." It's nonsensical to claim that a condition that is "persistent," that is, longstanding and unchanging, is "unusual," "extraordinary," and an emergency.

The most famous case challenging a president's declaration of an emergency was *Youngstown Sheet & Tube Co. v. Sawyer* (1952) where during the Korean War, after the nation's steel companies ceased operation during a labor strike, President Truman seized control of the steel mills and operated them under federal direction.

The Supreme Court, a strong court with integrity to the constitution, held that despite the Truman's bold action as Commander-in-Chief to fight a terrible war (37,000 American soldiers were killed and 97,000 wounded), his steel mill seizure was unconstitutional without Congress's express authorization.

One may wonder how today's court would rule if Trump was the president.

Finally, Trump's tariffs are not only unauthorized by Congress by also fail under the court's "Major Questions" doctrine. Under this newly-minted creation, the president would be required to point to a clear congressional authorization for the asserted

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Expert Analysis



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Algorithms as Hiring Gatekeepers: Regulating AI in Recruitment

"The secret of my success is that we have gone to exceptional lengths to hire the best people in the world."

—Steve Jobs

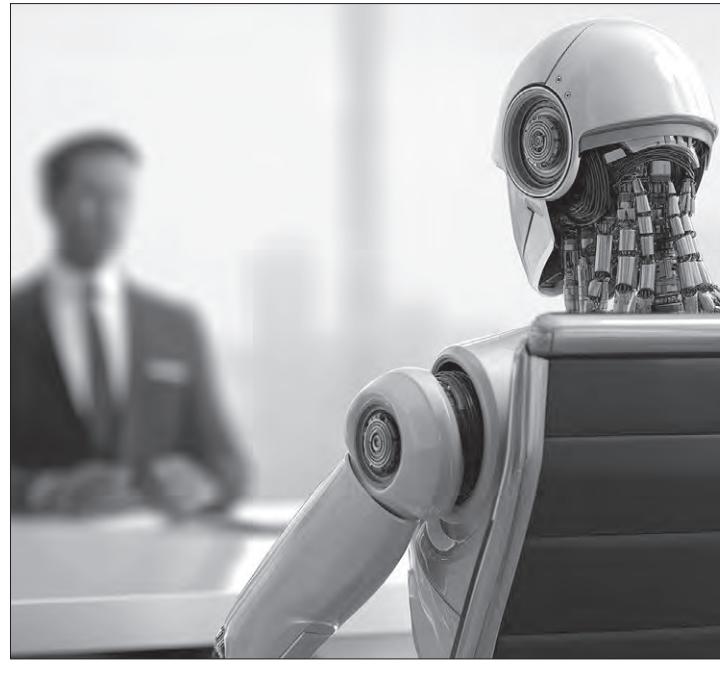
alent acquisition and recruiting departments are swamped. Each corporate job posting can receive dozens or hundreds of applications. Historically, recruiters manually sifted through piles of applications to select a limited number of candidates for further screening, and ultimately, to interview.

Today, artificial intelligence (AI) tools are becoming increasingly common and can help streamline that process by sorting and screening large volumes of applications in seconds based on specific experience, keywords, or phrases that more likely match the job description or the qualifications sought. This can significantly reduce the time and effort needed from human resources personnel, as well as the length of the overall process, to find potentially suitable candidates.

While AI can offer significant efficiencies, it also can also exacerbate current problems in recruiting and introduce new challenges. AI tools are not perfect and can easily reflect—or magnify—human bias, both that of the developers of the AI algorithms and in the underlying data used to train the AI models.

Those biases can skew results in both knowable and unknowable ways, resulting in potentially harmful outcomes like disadvantaging can-

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By
Peter
Brown
And
Doron
Goldstein

law regulating artificial intelligence use by employers, targeting the hiring process, with NYC Local Law 144 having come into effect on Jan. 1, 2023. Colorado followed suit in May 2024 with the passage of SB 24-205, otherwise known as the Colorado AI Act, as the first comprehensive legislation regulating the use and development of AI systems, including in relation to employment.

The Colorado AI Act is set to go into effect on June 30, 2026. In Aug. 2024, Illinois passed HB 3773 amending the Illinois Human Rights Act and addressing AI use in hiring practices, which will take effect Jan. 1, 2026.

And on Sept. 28, 2025, Governor Gavin Newsom signed SB 1100, an amendment to California's Fair Employment & Housing Act, which took effect on Oct. 1, 2025, aimed at, among other things, regulating AI use in the hiring process. Interestingly, California's SB 7, known as the "No Robo Bosses" Act, was vetoed by Governor Newsom in Oct. 2025, thus eliminating a requirement that employers' give notice to potential employees of any AI use in their employment practices, a concept

andidates based on their background, gender, or race. In research for the University of Washington Information School's "Gender, Race, and Intersectional Bias in Resume Screening via Language Model Retrieval" the authors took 550 real-world resumes and found that the AI models favored white-associated names 85% of the time, female-associated names 11% of the time, and never favored Black male-associated names over white-male associated names.

The increased use of AI in the hiring process has drawn the attention of regulators and elected officials. States and cities alike have begun to regulate recruiting AI practices, recognizing the inherent bias and other risks in AI technologies. Laws, ordinances, and regulations specifically targeting employment-related AI use and requiring certain guardrails

have been enacted in jurisdictions including New York City, Colorado, Illinois, and California.

This article provides an overview of the recent AI laws and regulations

While AI can offer significant efficiencies, it also can also exacerbate current problems in recruiting and introduce new challenges.

with a particular focus on New York City's ordinance, its requirements, impact since its effective date, and considerations for compliance as employers continue to navigate a new regulatory environment.

A. Overview of Recent Laws and Regulations

In 2021, New York City became the first jurisdiction in the US to pass a

that still exists under New York City's ordinance.

B. NYC Local Law 144

Given its nature as a local ordinance, New York City's Local Law 144's scope is necessarily limited, and covers employers operating and employees residing in New York City. Its primary aim is to regulate the use of automated employ-

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It's Just a 'Cookie'—Until It's a Lawsuit: Why Website-Tracking Risks Have Become Too Big To Ignore

BY TRUDY KNOCKLESS

FOR in-house lawyers, 'cookie' compliance has become a fast-evolving, high-risk issue, one that's attracting aggressive litigation and state-level enforcement.

That was the message from Elliot Golding, a Washington, D.C.-based partner at McDermott Will & Schulte, during a recent JD Supra webinar hosted by the law firm. The session, titled "Navigating Cookie and Website Compliance in 2025: Insights and Strategies for In-House Counsel," walked through the mounting legal and technical risks associated with cookies, pixels, session replay tools and other tracking technologies—and what legal departments can actually do about them.

Golding, who focuses on proactive compliance and business risk counseling, warned that regulatory scrutiny has intensified, with more than 20 U.S. states now having privacy laws on the books, many of which include opt-out requirements for sales, sharing or targeted advertising. But enforcement is just one side of the coin. The other: a rising tide of plaintiff litigation, much of it repurposing 1960s-era wiretapping laws for the digital age.

"We're seeing dozens of plaintiffs' firms sending hundreds or thousands of cookie letters every month," Golding said. "They know these are really extortion demands. A lot of them settle for \$15,000 or \$30,000. But there are some that won't settle for less than six or seven figures—and a few that skip the demand letter entirely and just file a lawsuit."

At the heart of the litigation wave is a legal theory that the use of third-party tracking technologies—often embedded into a website's code—amounts to unlawful interception of private communications between users and website operators.

"This is not just a weird outlier. California courts are not dismissing these cases," Golding said. "And for most of you, litigation is likely the bigger risk than regulation."

Golding emphasized that compliance is not as simple as flipping a switch on a cookie banner. "Most of the tools companies use are misconfigured right out of the box," he said. "You'll have a cookie banner that asks if you want to accept or reject cookies—but the cookies have already fired before the user even clicks anything. That's not just a compliance problem—it could be an unfair and deceptive practice."

Many companies also mistakenly think they're not "selling" data, as defined by privacy laws, because they aren't exchanging it for money. But in several states, "sale" includes any exchange of personal information for value, which could be as basic as letting an ad tech company use browsing data for its own analytics or marketing purposes.

And while some organizations opt for a risk-based approach—deliberately avoid-



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'They're Not Doing Much': How Ogletree Deakins Is Filling An AI Education Gap

BY BENJAMIN JOYNER

MANY law firms are increasingly focusing on training attorneys to use generative artificial intelligence, but some of their efforts may leave out a vital group. While senior attorneys often assume junior associates are better equipped to leverage new technology, some law schools are failing to provide gen AI training. That gap led Ogletree Deakins to launch an "AI Bootcamp" for first-year associates.

The firm, which previously conducted its first-ever hackathon for summer associates this year, decided to expand its gen AI training to first years after learning how little exposure incoming associates had to gen AI-powered tools.

"As part of [the hackathon], we did a survey at the end that asked, 'Hey, what are your law schools doing?'" said Tim Fox, Ogletree's senior director of practice innovation and solutions. "The response was, generally, they're not doing anything, or they're not doing much."

Molly Rochford, an Ogletree associate who participated in the bootcamp, told Legaltech News that she received essentially no exposure to gen AI-powered legal tools while in law school.



COURTESY PHOTO
Molly Rochford

"The only time AI came up was to say, 'Don't use it, be cautious,'" she said. "It was highly discouraged and not talked about much, and definitely no indication that there could be these tools used in specific instances for legal research or legal drafting."

The lack of training in law school can leave graduates unfamiliar with how gen AI works broadly and unsure how to use the particular tools they'll call upon in their practice. This shortcoming does not just limit their ability to leverage AI to become more efficient; it can also expose them and their firms to ethical risks.

"We have all sorts of obligations, both to clients but also to state bars, plus everything else, so making sure that any usage of the platforms complies with that is really important," Fox said. "Clients do not pay for you to copy from Harvey into a brief. Clients pay for you to use your judgment, what you went to law school for."

A Practical Approach

Ogletree's earlier hackathon for summer associates was designed to allow participants to think creatively about how gen AI could be applied to legal work. The program unfolded over the course of several weeks, as the summer associates were given multiple training sessions on the gen AI tools available at the firm and allowed to work on their entries for two weeks.

The nature of associates' full-time legal work called for a different approach for Ogletree's AI Bootcamp. The firm wanted to minimize the amount of time a program for associates would take, given their billable hour obligations, leading the practice innovation team to opt for a one-day event.

The compressed timeline also mandated a narrower focus. While the firm has more than 20 gen AI-powered tools that it either developed internally or acquired from vendors, the bootcamp focused solely on Harvey and LexisNexis Protégé, broadly applicable tools likely to be useful for work in any practice group.

On Oct. 1, Ogletree's 17 first years were provided with an hour of training on how to use Harvey and Protégé. The associates were then split into five groups of three or four, and given an hour to draft a motion to dismiss based on a complaint with 11 causes of action and a client file.

"The goal for the project wasn't to get a file-ready motion in an hour. The goal was to force them to use these tools under a high-pressure situation, to say, 'Jump in, figure it out,'" Fox said. "We found that just getting people to start using and getting over that blank page problem really helps them better understand how to use the platform and how it can assist them in their work."

Rochford said the compressed timeline compelled her team to dive straight in, using both tools simultaneously to see which one was better equipped to handle different parts of the drafting and research process.

"With the three team members, we broke it up—one used more Harvey, one used more Protégé," she said. "We were comparing it back and forth, with a focus on more case law and substantive legal knowledge from Protégé, and a little more focus on the drafting and an outline idea from Harvey, and then combining those two together to get a motion to dismiss."

"We tried different prompts too, to see which is giving us an output that we like the most and which is giving us the most information and seems to be on the right track," she added.

The motions submitted by the associates were judged by Fox and two of the firm's other practice innovation attorneys, with Rochford's

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COMMENTARY

7 Tips: 200+ Tech and Legal Experts Weigh in on AI, Governance, and ROI

BY SHASHI ANGADI

The legal profession has always been about judgment. But judgment must be backed by process, documentation, and proof that every decision can withstand regulatory or judicial scrutiny.

This requirement has given rise to a new operational mandate: defensibility must move from a theoretical aspiration to a daily discipline. And it's more than just legal teams who should be involved. The XChange 2025 conference in Denver explored a central question facing every general counsel and compliance officer: How can defensibility become measurable, repeatable, and cost-effective?

The consensus was clear. Defensibility cannot be a reactive fire drill. It must be built into workflows, cross-functional governance, and even budget planning.

Here are seven tips (or best practices) heard at Exterro's XChange event, for operationalizing defensibility and transitioning from fulfilling a compliance requirement to gaining a competitive advantage.

1. Build Defensible Automation

Building defensible automation starts with logging every decision. While AI can dramatically reduce burdensome review, its output must be explainable and defensible in court or before regulators.

Legal teams and tech experts should start small with high-volume, low-risk tasks such as FOIA redactions, legal hold notices, or complaint intake. They should require vendors to provide regulator-ready audit trails and guarantee that customer data isn't used to train models. They should also run parallel attorney-only and AI-assisted workflows to validate outcomes before scaling.

2. Treat Governance As a Daily Discipline

Defensibility extends beyond technology and depends on governance that evolves with changing regulations, risks, and data landscapes. Hilltop Securities, for example, created a cross-functional governance council including legal, privacy, security, and IT, unifying multiple business units under one platform. Enterprise teams can follow this

model by formalizing a governance council with quarterly reviews of policies, retention schedules, and playbooks. This will allow the team to map workflows to frameworks like GDPR, CPRA, and DOJ guidance and automate report generation so regulator-ready documentation is produced as part of routine operations.

3. Use Collaboration As Risk Reduction

No investigation, breach response, or discovery project succeeds in isolation. Legal, IT, privacy, and forensics teams must operate as a unit. Clear role definition and cross-team exercises are critical.

Defensibility cannot be a reactive fire drill.

It must be built into workflows, cross-functional governance, and even budget planning.

Teams and their technical counterparts should adopt RACI project management models to specify who is responsible, accountable, consulted, and informed for each workflow step. They should also conduct tabletop exercises at least twice a year to stress-test processes and centralize technology platforms to maintain chain of custody and reduce discovery risks.

4. Make Cost Savings Repeatable

Defensibility is not just a legal shield. It can also drive measurable business value. Rockwell Automation standardized global workflows and used its e-discovery stack to defensibly delete risky data, reduce hosting costs, and improve preservation processes.

Legal and tech teams can replicate this approach by tracking metrics such as hosting costs, review hours, and outside counsel spend per matter. This will standardize workflows and codify lessons to replicate savings across future matters and regions, and it will establish benchmarks to demonstrate ROI to the C-suite.

5. Turn Compliance Into A Competitive Advantage

Mature compliance programs build trust with boards, investors, and customers, while certification programs and internal training elevate team expertise that adds

value to ESG reporting, M&A due diligence, or customer audits.

Legal teams and tech experts should integrate defensibility metrics into reporting frameworks and external audits, turning every investigation or regulatory response into a learning opportunity for policy and playbook updates, and offering staff certification to strengthen internal expertise and credibility.

6. Move From Talking Points to Dashboard Metrics

Defensibility should no longer reside solely in policy manuals or slide decks. It must be measurable and reportable alongside spend, matter velocity, and risk exposure.

Legal and tech teams can track defensibility as a key metric in board reports alongside other operational KPIs and use dashboards to monitor AI-assisted workflows, governance compliance, and cost efficiency.

7. Embed Defensibility Across the Organization

Operationalizing defensibility completely changes legal from a cost center into a strategic partner, helping cross-functional teams avoid sanctions while building trust, efficiency, and enterprise value.

Legal and tech pros should integrate explainable automation, living governance, cross-functional collaboration, repeatable cost savings, and proactive reporting into daily operations. They should also embed defensibility into the organization's culture and operational rhythm. Every matter should be treated as an opportunity to improve processes, strengthen compliance, and generate measurable business impact.

Defensibility needs to be a daily discipline. Legal and tech teams that embed AI-assisted automation, adaptive governance, and measurable cost efficiencies not only to mitigate risk, but also earn a seat at the table by turning compliance into a competitive advantage.

SHASHI ANGADI has served as Exterro CTO for nearly two decades, building an end-to-end platform for enterprises and their outside counsel to holistically manage data governance, risk and compliance processes. Before Exterro, he was a solutions architect at U.S. Bank and a consultant at Fujitsu.

Judicial Ethics

Opinions From the Advisory Committee on Judicial Ethics

The Advisory Committee on Judicial Ethics responds to written inquiries from New York state's approximately 3,600 judges and justices, as well as hundreds of judicial hearing officers, support magistrates, court attorney-referees, and judicial candidates (both judges and non-judges seeking election to judicial office). The committee interprets the Rules Governing Judicial Conduct (22 NYCRR Part 100) and, to the extent applicable, the Code of Judicial Conduct of the American Judicature Society. The committee consists of 28 current and retired judges, and is co-chaired by the Honorable Debra L. Givens, an acting justice of the supreme court in Erie County, and the Honorable Lillian Wan, an associate justice of the appellate division, second department.

Opinion: 25-80

Digest: A judge may review existing orders of protection in order to make an informed decision concerning a matter that is pending before the judge, and may, in his/her discretion, disclose that information to the parties and their counsel.

Rules: Judiciary Law § 212(2) (l); 22 NYCRR 100.0(S); 100.1; 100.2; 100.2(A); 101.1; Opinions 25-09; 21-145; 15-85; 09-96.

Opinion: A Family Court judge asks if it is ethically permissible to sua sponte look up litigants in the court's case management database to assist in his/her judicial decision-making. As always, we cannot comment on any legal issues (see Judiciary Law § 212[2] [l]; 22 NYCRR 101.1).

Accordingly, we conclude the judge may review existing orders of protection in order to make an informed decision concerning a matter that is pending before the judge, and may, but is not obligated to, disclose that information to the parties and their counsel.

Opinion: 25-81

Digest: A judge may review and decide objections to orders issued by a support magistrate who presided over the judge's own recently concluded child support matter, provided the judge concludes he/she can be fair and impartial. The judge need not make any disclosure.

Rules: 22 NYCRR 100.2; 100.2(A); 100.3(E)(1); Opinion 22-173.

Opinion: A Family Court judge asks if he/she may review and decide objections from orders of a support magistrate who had previously presided over the judge's own recently concluded child support matter, provided the judge concludes he/she can be fair and impartial. The judge need not make any disclosure.

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Outside Counsel / Technology Today / Off the Front

Bardakova'

«Continued from page 4
frustrate arrest. Bescond took no such action.”

The court further held that constructive-flight fugitivity applies to a person “who allegedly committed crimes *while in the United States* but who *were* outside the country” when they learned of the charges and then refused to surrender. (Emphasis added). In finding that Bescond was not a fugitive, the court stressed that “Bescond was not in the United States while allegedly committing the charged conduct.” In an interesting contrast to *Bardakova*, the Court also held that Bescond was not “refusing to return to the United States to avoid prosecution; she simply remains at home.”

Although holding that Bescond was not a fugitive, the Second Circuit still went on to assess the second step of the FDD inquiry,—i.e., the discretionary decision of whether disentitlement was proper for a given “fugitive.” In exercising (or not) its discretion to invoke the FDD, courts are to look at the purposes of the doctrine, which include (1) ensuring *enforceability* of the court’s decision (or “mutuality”); (2) penalizing the *flouting* of the judicial process; (3) discouraging flight; and (4) avoiding *prejudice* to the

guilt or innocence, and regardless of whether the indictment charges violations of a statute that applies extraterritorially; if a prosecutor gets an indictment of a foreign person (a “low bar”) then “any soul on the planet may be deemed a fugitive,” requiring her to “leave home and face arrest and detention to have any hope of securing dismissal.”

In this respect, the *Bescond* court echoed the concerns of the *Hijazi* court and others as to the real-world impact of a disentitlement ruling, including restrictions on ability to travel, reputational concerns, and difficulty in obtaining or maintaining employment, among others. *See, e.g., Hijazi, 589 F.3d at 412-13.* (The *Bardakova* panel did not seem to share these concerns.)

For all these reasons, the court held the FDD did not apply to Bescond. This decision was a potential “game-changer” because the ruling allowed foreign citizens facing criminal charges in the U.S. to challenge the indictment, under certain circumstances, without needing to appear in the U.S. *See John Hillebrecht, Jessica Masella, U.S. v. Bescond Addresses “Fugitive Disentitlement”: Potential Game Changer for Foreign-Based Defendants Facing US Charges, FCPA Professor (Aug. 31, 2021).* *Bardakova:* A Broader Net

In ‘*Bardakova*,’ the Second Circuit appears to have drawn a bright line between defendants who never set forth in the United States and those who committed at least part of the conduct at issue while physically present.

prosecution. The way the *Bescond* court analyzed these factors stands in marked contrast to the way the Second Circuit later did in *Bardakova*.

As to enforceability, the *Bescond* court held that disentitlement was “a disproportionately severe response to Bescond’s absence” and “too harsh a means of ensuring mutuality, because “[i]t could not be said that Bescond fled the [jurisdiction] to seize an unfair advantage or game the system.” It also observed: “Other than to avoid a ruinous designation as a fugitive, Bescond has no reason to travel here.”

As to “flouting,” the court found there was “no basis for a finding that Bescond is exhibiting disrespect for U.S. law.... All Bescond has done is stay at home [and] her reasons for litigating from home are legitimate and fair.”

Regarding discouraging flight, the court again simply observed “Bescond was never here” and stressed that her conduct was “legitimate” banking activity carried out entirely in France, finding that any slight general deterrence in this context was not sufficient.

Similarly, as to prejudice the court held that the only real prejudice was that the evidence would grow stale, which it found unpersuasive given that the indictment was not returned until “six to seven years” after the conduct.

After considering all four factors, the court went on to address the “countervailing prejudice to Bescond” of a “ruinous designation as a fugitive” and disentitlement. The ruling below “enables the government to coerce Bescond’s presence in court by imposing financial, reputational, and family hardship regardless of her

The July 2025 *Bardakova* decision is principally distinguishable from *Bescond* because a significant portion of the underlying conduct occurred while the defendant was physically in the U.S.

Bardakova was a Russian citizen who conspired with a Russian oligarch subject to U.S. sanctions to help him evade those sanctions. This included facilitating the travel of the oligarch’s partner (Ekaterina Vorinova), to give birth to their children in the U.S. *United States v. Bardakova*, 145 F.4th 231, 238-39 (2d Cir. 2025).

Bardakova arranged to send money to the U.S. to rent a house for Vorinova’s use and travelled to the U.S. to make other arrangements. She then went to pick up Vorinova at the airport. There, she was met by FBI agents, who interviewed her. After the interview (during which she allegedly lied), *Bardakova* flew back to Russia. Four months later, she was indicted. She has not returned to the U.S. since.

Unlike *Bescond*, not only did *Bardakova* commit part of her offense in the U.S., she had a pattern of travel to the U.S. She ultimately ceased all travel to the U.S. after learning of the charges against her.

The Second Circuit, for the first time, adopted a “totality of the circumstances” test to determine whether *Bardakova*’s refusal to return to the U.S. was motivated by an intent to avoid prosecution. The court listed a number of non-exhaustive factors that can be considered in determining a defendant’s intent to avoid prosecution, which included:

- The defendant’s nationality and domicile;
- Their pattern of travel to and from the U.S.;
- Any efforts to cooperate with U.S. authorities; and

• Legitimate reasons for remaining abroad.

Applying these factors, the court found *Bardakova* to be a constructive-flight fugitive based on her prior regular travel to the U.S., abrupt cessation after indictment, and a lack of any legitimate reason for not returning to the U.S.

But principally, the court relied heavily on the fact that “*Bardakova*, unlike *Bescond*, has not ‘remained at home abroad’ [but] traveled to the United States” to engage in the conduct for which she was indicted; “*Bardakova*’s alleged domestic [U.S.] conduct distinguishes her from defendants whom courts have not considered fugitives—namely, foreign nationals indicted for conduct that occurred entirely abroad.”

The court also relied repeatedly on the fact that *Bardakova* left the country “once she became aware that her conduct attracted the attention” of the FBI. Query how significant the absence of such a fact would be in a future case?

Significantly, the court held that “a person may be considered a constructive-flight fugitive if they have multiple reasons for remaining abroad, so long as one reason is to avoid prosecution in the United States.... [It need not be the sole, principal, or dominant intent.]”

One would be hard-pressed to imagine a person whose reasons for not travelling to the U.S. in this context would not be, at least in part, to avoid detention and prosecution. Again, this strongly suggests that “any soul on the planet” will be deemed a fugitive under this prong of the *Bardakova* analysis. Similarly, in the discussion of the “Step Two” discretionary analysis, the court stressed that “a district court may disentitle a fugitive even if some objectives weigh against disentitlement, so long as other objectives weigh heavily enough in favor of disentitlement.”

From ‘Bescond’ to ‘Bardakova’

The court in *Bescond* appeared to afford more protections for foreign defendants. *Bardakova*, however, signals that defendants with any meaningful U.S. nexus—especially those who have traveled to the U.S. in connection with alleged crimes—are more likely to be subject to the FDD. The court’s “totality of the circumstances” approach allows the court to scrutinize not just a defendant’s physical location, but the reason they are there, and what their past conduct reveals about their intent to avoid prosecution.

Practical Implications For Foreign Defendants

In *Bardakova*, the Second Circuit appears to have drawn a bright line between defendants who never set forth in the U.S. and those who committed at least part of the conduct at issue while physically present. For the latter category of defendants, it is hard to conceive how one could avoid disentitlement after *Bardakova*. But for the former (like Ms. *Bescond*), *Bardakova* may afford an opportunity for defense counsel to argue an even stronger case against disentitlement. In either context, U.S. defense counsel should consider early engagement with U.S. authorities to avoid a finding that their client is a fugitive.

The Second Circuit’s message is clear: staying home abroad is not always a safe harbor.

Cookie'

«Continued from page 5
ing opt-in consent in California to avoid undermining marketing goals—Golding made clear that this strategy comes with significant trade-offs.

“If you’re looking to minimize litigation risk, opt-in consent is realistically the only thing that works,” he said. “But that’s a tough pill for a lot of marketing teams.”

The conversation didn’t stop at cookies. Raja Chatterjee, a partner in McDermott’s Dallas office, outlined overlooked website compliance traps that go beyond privacy—especially around intellectual property.

Fonts and stock images, for example, remain a quiet source of

legal trouble. “People get tripped up when they reuse stock images outside the original license scope,” Chatterjee said. “Even royalty-free licenses often come with limitations—and not all Creative Commons images are safe for commercial use.”

Font software licensing is another potential minefield. “The typeface may not be copyrightable, but the font software is,” he explained. “Using a font under the wrong license—like applying a desktop font on a mobile app—can lead to problems.”

Chatterjee also flagged a European court case involving Google Fonts, where calling the fonts via Google’s API was found to violate GDPR because it transmitted user data without consent. His advice: self-host fonts if there’s any chance

your site will be accessed from Europe.

So what should in-house counsel do? According to Golding, it starts with an internal audit and cookie inventory—followed by a careful review of contract language with third-party vendors, proper categorization of cookies, technical testing to ensure opt-out functionality works, and updated privacy and cookie notices that reflect the site’s real-world practices.

“This isn’t something you can set and forget,” Golding said. “You need legal and technical teams talking to each other. And you need someone who can call BS if something’s not actually functioning the way your privacy notice says it is.”

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together to reach “a satisfactory resolution.”

Robinson said in a statement on behalf of plaintiffs: “Rabbi Konikov and Lubavitch of Old Westbury are grateful for the Court’s decision, and its time and attention.”

Counsel for the Village of Old Westbury did not immediately return messages seeking comment.

Emily Saul can be reached at emily.saul@alm.com.

Zoning Law

«Continued from page 1
man of Robinson & Cole and Brian Pete of Lewis Brisbois Bisgaard & Smith.

Plaintiffs are represented by Michael Cedrone and Eric Robinson of Stevens & Lee.

Brown noted that, two years ago, he ruled the case “must be moved forward with deliberate speed.”

The judge said he had considered striking defendants’ motion to dismiss but opted not to do so “considering the seeming interminability” of the case. The matter, filed in 2008, is the oldest on the court’s docket, he said.

Additional discovery in the case has only bolstered the zoning law’s fiscal infirmity, he observed.

Brown granted plaintiff’s motion for partial summary judgment and ordered the parties to work

Calendar of Events

TUESDAY, NOV. 4

NY City Bar (Non CLE)

Bar@theBar

6 p.m. - 8 p.m.

In-Person Registration Link: <https://services.nycbar.org/EventDetail?EventKey=NL110525&mcode=NYLJ>

Location: 42 West 44th Street

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=NL110525&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

WEDNESDAY, NOV. 19

NY City Bar (Non CLE)

That’s a (Possible) Dealbreaker: Collectively Bargained Benefits

9:30 am - 10:30 am

Hybrid Registration Link: <https://services.nycbar.org/EventDetail?EventKey=EBEC111925&mcode=NYLJ>

Location: Zoom/42 West 44th Street, New York, NY 10036

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

Alternative Legal Paths that Value Your JD

12:30 p.m. - 2 p.m.

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=NLI111925&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

NY City Bar (CLE)

Hot Topics in Not-for-Profit Law: Best Practices for Navigating the DEI and Lobbying/Advocacy Landscape

2 p.m. - 5 p.m.

3 CLE credits

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=WEB110525&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

THURSDAY, NOV. 13

NY City Bar (Non CLE)

vLex Fastcase - General Overview

Webinar

2 p.m. - 3 p.m.

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=FAS111325&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

FRIDAY, NOV. 14

NY City Bar (CLE)

Hot Topics in Advertising & Marketing Law

9 am - 1 p.m.

4 CLE credits

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=WEB100125&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or customerrelations@nycbar.org

NY City Bar (CLE)

Senior Lawyers Chatroom

12 p.m. - 1 p.m.

Webinar Registration Link: <https://services.nycbar.org/EventDetail?EventKey=SEN111425&mcode=NYLJ>

Location: Zoom

Contact: Customer Relations Department, 212-382-6663 or <a href="mailto:

Off Page 2 / Technology Today

Laterals

«Continued from page 2

"We've seen, now, multiple examples of private capital coming into firms and being used to allow those firms to expand geographically, and as part of the geographic expansion, for them to hire lawyers in the relevant markets," said Scott Mozarsky, co-CEO and managing director of M&A advisory firm Jegi Leonis. "What I don't think we've seen yet is ... your Am Law 25, your Am Law 100 taking capital [for talent acquisition]."

Mozarsky said he and his team are aware of certain firms having discussions about taking capital for talent, but they haven't actually seen money deployed as of yet for this purpose.

At the same time, change is likely on the horizon, as private equity continues to eye the legal industry eagerly, given its high profitability and promise of recurring revenue.

"For this to really work, the PE would have to be adding some kind of value to the transaction between the firm and the lateral that goes beyond just the money," said Benn, of Womble Bond. "Maybe it's initially creating the match between the two—effectively playing the role of the con-

sultant but delaying payment in lieu of forward revenue. Or maybe it's in helping the firm capitalize on its new synergies by connecting them with others in their network or something else?"

Firms Bear All the Risk Today

Benn said it's quite clear that lateral candidates themselves are looking to reduce risk as they make a "bet-the-career decision," which is why they often demand guaranteed compensation and the firms are bearing all that risk today, "and mostly have an atrocious track record for predicting success."

Others drew a distinction between the affirmative use of private capital to actively acquire high-value partners or practice groups, and the defensive use of outside funding, which gives otherwise cash-strapped firms the financial backing to try and prevent elite lawyers and star groups from fleeing to another firm. One format for this could be in the creation of a management services organization (MSO) that allows firms to harness outside capital for their back office operations.

"The piece I find equally interesting is the defensive side, it lets firms hold onto their star performers and star practice groups

by creating an asset, a measure of value to give to partners and others, equity in the MSO that makes it more expensive if a firm with more cash flow wanted to acquire that group," said David Perla, vice chair of litigation financier Burford Capital.

Whether private capital is used for talent acquisition or other law firm needs, one expert says the MSO model will likely continue to gain popularity as more firms see the benefit of privately invested dollars being used for law firm business and administrative functions.

"The legal MSO model is going to hit a billion dollars in revenues managed by the end of next year. I have zero doubt," said Frederick Shelton, a legal recruiter and consultant with nearly three decades of experience.

Shelton said once accounting firms like KPMG entered the legal field through the alternative business structure model, he predicted a wave of similar interest in non-lawyer ownership and involvement in the legal industry.

"It's going to be inevitable," he said. "The Am Laws have no clue what's coming at them."

John Campisi can be reached at john.campisi@alm.com.

Recruitment

«Continued from page 5

ment decision tools (AEDT) in the hiring process.

An AEDT is defined under the law as a computing process—derived from machine learning, statistical modeling, data analytics, or artificial intelligence—that provides a simplified output such as a score, classification, or recommendation, that is used to substantially assist or to replace human discretionary decision making for making employment decisions.

If an employer wants to use an AEDT in the recruitment process,

The ordinance imposes penalties for non-compliance, with a first violation resulting in a fine up to \$500, and for each subsequent violation a fine between \$500 and \$1,500. Violations include both use of an AEDT in violation of the ordinance's requirements, with each day of use being a separate violation, and failure to give notice to a candidate or employee, which is a separate violation.

C. Impact of NYC Local Law 144

Researchers at the Citizens and Technology (CAT) Lab at Cornell University assessed the achieve-

ments and employees, data retention requirements and consent, and have potentially-significant penalties for violations.

The consequences of non-compliance with AEDT recruitment laws extend beyond the fines and potential enforcement actions. In addition to the potential reputational risks to an employer or employment agency from engaging in hiring impacted by AI bias—and potential separate claims under employment discrimination laws—biased recruitment could mean excluding candidates that best fit employers' needs.

To implement AI tools for recruitment successfully and in compliance with the existing AEDT laws, a few key elements should be considered:

- Determine whether the tools and their use are subject to one or more of the AEDT laws;
- Has the vendor conducted an appropriate and sufficient bias audit for the anticipated implementation that can be used purposes of compliance evaluation, and is the vendor committed to conducting annual audits, or is it necessary to conduct a separate bias audit in advance and/or annually thereafter;
- How will appropriate notice be given by, and, if applicable, consent obtained from, candidates prior to the use of the AI tool for screening their applications;
- What type of alternative process and accommodation should be given to candidates who opt-out of the AI screening?

Compliance with NYC Local Law 144 is a step toward addressing bias in the hiring process. It is critical that AI technologies are audited to ensure that companies are not blindly relying on technology that could be perpetuating stereotypes or engaging in problematic profiling.

AEDT laws provide frameworks to help employers strike a balance between the efficiency emerging technologies promise and the need for human oversight and a human element in the hiring process.

the tool must have undergone a bias audit not more than one year before the use of the tool, conducted by an independent auditor. The results of the audit must be made publicly available on the employer's website (or the site of an employment agency if applicable). Thereafter, if an employer wants to continue to use AEDT in the hiring process, bias audits must continue be conducted on an annual basis.

The law also requires that notice be given to candidates, prior to use of the AEDT, when an employer or employment agency is using any form of AEDT. The notice must disclose that an AEDT will be used to evaluate or assess candidates and allow candidates to request an alternative process or accommodation. It also needs to disclose the characteristics that the tool will use in assessing candidates.

If not otherwise disclosed on the employer or agency's site, information about the type of data collected, by the AEDT, the source of the data and the employer's or agency's data retention policy must be made available within 30 days of a written request from a candidate or employee, except if the disclosure would violate other laws or interfere with a law enforcement investigation.

As AEDT-related legal requirements expand, employers will need to take more than just the New York City ordinance into account in their recruitment processes. The California, Colorado and Illinois laws impose similar—and in some cases greater—obligations in connection with consequential decision-making in recruitment and hiring in terms of bias audits and safeguards, disclosures to candi-



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Litigation

Tabloid Pull-Out Sections

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Court Calendars

First Department

APPELLATE DIVISION

CALENDAR FOR THE NOVEMBER TERM

WEDNESDAY, NOV. 5

2 P.M.

20/1115 People v Jose A.
25/0490 Robinson v Hiatt
25/0680 L. Anthony
25/0908 IGS Realty Co. v Brady
24/6646(1) Rodriguez v 167 LLC
24/0829(1) Rodriguez v 167 LLC
22/5672 People v Lloyd Anderson
24/5348 Owens v New Empire Corp.
24/4782 Ng v Figueroa
19/5337 Peopple v Bredy B.
24/7465 B. John v Maria U.
25/4943 United Medicine & Rehabilitation v Yakobashvili
24/5568(3) Solomon v 360 E. 72nd St.
23/2138 People v Carl Moultrie
25/3695 Brigade Cavalry Fund v Chirico
24/1732(2) Windermere Properties v City of NY
24/2846 TD Bank v A.H. Dental
24/2969(2) People of State of NY v Richmond Capital
25/0616 People v Leonard Lewis
24/5313N Berger v NYC Transit Authority

THURSDAY, NOV. 6

2 P.M.

20/1314 People v Jeffrey Tartt
24/4085 Quezada v City of NY
25/0120 G. Cayanna
24/4495 Garcia v 100 Church Fee Owner
25/0192 Spence v Brosnan Risk Consultants
25/2669 Vassilev v Vassilev
24/2091 People v Syndou Cisse
24/0822(1) People v Syndou Cisse
24/5459 URPA Maiden Lane v Valley National
25/0629(3) Bordonaro v E.C. Provin Co.
25/2301 C. Nericida v Cristal C.
24/3849 RSD57, LLC v Wright
18/4488 People v Abdullahi Shuai
25/1341 Zepa Industries v 401 West Property
24/5946 Szczesniak v Ery Tenant
24/6848 Biswas v Aramis Distributors NY
24/4242 Lee v Montefiore Medical Center
24/4355(2) Will of Stanley Walker
24/2809 People v Jateise Leak
25/1837 N Blumhain v Chan

FRIDAY, NOV. 7

10 A.M.

20/2179 People v Rafael Jimenez
24/0603 SKMF VYSE Management v Niblack
24/4327 K. N., Children
25/1643 Hanslick v UG2
24/5853 Olsahn Frome Wlosky LLP v Kestenbaum
24/4304 Jones v River Park Residences
22/4242 People v Armando Cruz
24/5268 Molina v Mount Sinai Morningside
24/5471 Greenway Mews v Liberty Insurance
18/4623 People v Angel Soto
24/2644 Ovaskainen v Ovaskainen
24/3491 D. Justice
24/7648(3) Parola Solar v Enel S.P.A.
25/0939 Rockwell v Bobst

FRIDAY, NOV. 7

10 A.M.

20/2179 People v Rafael Jimenez
24/0603 SKMF VYSE Management v Niblack
24/4327 K. N., Children
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24/4304 Jones v River Park Residences
22/4242 People v Armando Cruz
24/5268 Molina v Mount Sinai Morningside
24/5471 Greenway Mews v Liberty Insurance
18/4623 People v Angel Soto
24/2644 Ovaskainen v Ovaskainen
24/3491 D. Justice
24/7648(3) Parola Solar v Enel S.P.A.
25/0939 Rockwell v Bobst

FRIDAY, NOV. 7

10 A.M.

20/1855(1) People v Quaran Rich
25/3501 CLNC 2019-FL1 Funding v Bennett
25/1761 M. Lucia v Jessica H.
24/7053 Caja v Posillico Civil, Inc.
24/1648 Fishman v Fishman
23/544 People v Saquon Jackson
25/3543 Jimenez v Rosi
24/5661 Jane Doe One v KIPP Academy
24/0206 People v Douglas Williams
24/5167 Greenland Asset v Microcloud Holdings
25/0740 Stevens v Audithan LLC
22/1402 People v David Taylor
25/2195 NYCT Transit Authority v Local 100 TWU
24/6301 O'Rourke v Hammerstein Ballroom
24/5872 State of NY v Daniel M.
19/5509 People v Joseph Medina-Hidalgo
24/7386 Llerena v 975 Park Avenue Corp.
25/0349 Flexjet, LLC v Honeywell International
22/5579 Peopple v Dillon D. Johnson-Watson
24/5460(1)N Wilmington Savings v Lau

WEDNESDAY, NOV. 12

2 P.M.

20/1855(1) People v Quaran Rich
25/3501 CLNC 2019-FL1 Funding v Bennett
25/1761 M. Lucia v Jessica H.
24/7053 Caja v Posillico Civil, Inc.
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WEDNESDAY, NOV. 12

2 P.M.

20/18

653622/21 Wiener v. Franchitti
THURSDAY, NOV. 6
 253038/211 Bk St. Corp. v. The Tax Commission of The City of New York
 254961/1711 West 20 St.
 Condominium v. The Tax Comm. of NYC
 266352/24113 Willow Ave. Rty. Co.
 v. The Tax Comm. of NYC
 254658/2122 Norfolk St. v. The Tax Comm. of NYC
 258571/19125 Bowery Inc. v. The Tax Comm. of NYC
 261093/18136/140 W. 16th St. Rty. Corp. v. The Tax Comm. of NYC
 259716/18135 Rty. Corp. Llc v. The Tax Comm. of NYC
 256221/17160 Waverly Pl. v. The Tax Comm. of NYC
 256141/23161 East 61st St. v. The Tax Comm. of NYC
 256220/17164 Waverly Pl. v. The Tax Comm. of NYC
 254489/21265 Waverly Pl. v. The Tax Comm. of NYC
 253521/18170 B'way, Retail Owner v. The Tax Comm. of NYC
 260374/18200 West End Ave. v. The Tax Comm. of NYC
 264837/17205 East 59th St. A/k/a 205e59 v. The Tax Comm. of NYC
 252302/2221 West 34 Owner LLC v. The Tax Comm. of NYC
 260607/1929 West 34 Owner LLC v. The Tax Comm. of NYC
 260788/20312 East 23 LLC v. The Tax Comm. of NYC
 252497/17322 West 11th St. v. The Tax Comm. of NYC
 263933/1933 Greenwich Owners Corp. v. The Tax Comm. of NYC
 260508/20384-386 Eight Ave. LLC v. The Tax Comm. of NYC
 251617/184 Park Ave. Associates v. The Tax Comm. of NYC
 656244/2050 East 96th St. LLC v. Prestige Salon, Inc.
 240027/24510 Fifth Propco LLC v. The Tax Comm. of NYC And The Comm'r. of Finance of NYC
 265975/23510 Fifth Propco LLC v. The Tax Comm. of NYC
 257170/2162 West 62nd St. LLC v. The Tax Comm. of NYC
 253412/1570 Broad LLC v. Tax Comm. of NYC
 256917/21731 Retail One LLC v. The Tax Comm. of NYC
 256263/17755 Washington St. LLC v. The Tax Comm. of NYC
 261207/17 Ben our Rty. Inc. v. Tax Comm. of NYC
 259607/22 Biltmore Owner v. The Tax Comm. of NYC
 256533/22 Bldg 888 Lex LLC v. The Tax Comm. of NYC
 253119/19Bldg E 53 LLC v. The Tax Comm. of NYC
 256982/22 Blue Millennium Rty. LLC v. The Tax Comm. of NYC
 656440/17Bp 599 Lexington Ave. LLC v. Europa of 53rd St. Inc.
 253282/22 City Urban Member LLC v. The Tax Comm. of NYC
 152794/20 Crown Asset Mgt. v. Wrzeszak
 257334/22 Crown NY Retail Acquisitions LLC v. The Tax Comm. of NYC
 263787/17Digital Chelsea LLC v. The Tax Comm.
 260499/15Digital Connect v. Tax Comm. of NYC
 264416/15Dow Jones & Co. v. The Tax Comm.
 240033/23 Egleston v. Tax Comm. of NYC Et Al
 24006/24 Egleston v. Tax Comm. of NYC Et Al
 258568/17 Esplanade 99 v. The Tax Comm.
 452923/23 F&D 2327 Second Ave. v. Metro. Transportation Auth.
 260886/14Fg Associates v. Tax Comm. of NYC
 263599/22 Garment One Garage LLC v. The Tax Comm. of NYC
 258589/22 Gp Abitbol v. The Tax Comm.
 257218/18 Gramercy Equities Corp. v. The Tax Comm. of NYC
 250699/17 Greystone Capital Group v. The Tax Comm. of NYC
 260656/14 Imperial Court Mgt. LLC v. The Finance Admin.
 153188/22 In the Matter of The Application of The Metro. Transportation Auth. Relative To Acquiring Fee Title in Real Prop. Required For The Second Ave. Subway Project - Phase 2 v. Na 452301/25 In the Matter of The Application of The Metro. Transportation Auth. Relative To Acquiring Temporary Easements in Real Prop. Required For The Second Ave. Subway Project - Phase 2 Block 1687 v. Na 253772/23 Jeffrey L. Orenstein v. The Tax Comm. of NYC
 263663/16K.G.S. Elizabeth LLC v. The Tax Comm.
 265655/24Klich Associates v. The Tax Comm. of NYC
 259745/20 Kombarakaran v. Tax Comm. of The City
 250005/22 Kombarakaran v. Tax Comm. of NYC Et Al
 264438/16Lightower Fiber Networks II v. Tax Assoc. of The 258646/13 Lkdg Assoc. v. Tax Comm. of The
 256012/17 Lo-Ho LLC v. Tax Comm. of The 452913/23 Lucky Machine Wash Corp. v. Metro. Transportation Auth.
 452914/23 Lucky Machine Wash Corp. v. Metro. Transportation Auth.
 261599/18 Madison 54th St. v. Tax Comm. of The 452795/25 Metro. Transportation Auth.
 257245/18Mhm Rty. v. The Tax Comm. of NYC
 251921/15 Osborn Tenants Corp. v. Tax Comm. of The 452911/23 Pecora Group Dev. LLC v. Metro. Transportation Auth.
 264412/15Rcn Telecom Services v. The Tax Comm.
 257396/20 Rogers Investments NY v. The Tax Comm. of NYC
 260198/20Sator Rty., Inc. v. The Tax Comm. of NYC
 260199/20Sator Rty., Inc. v. The Tax Comm. of NYC
 264413/15Sidera Networks LLC v. The Tax Comm.
 264411/15Sprint Communications, Inc. v. The Tax Comm.
 264414/15Telx NY LLC v. The Tax Comm.
 254996/22 Brauser Group #1 LLC v. The Tax Comm. of NYC
 451408/24NYC v. 528-534 West 39 LLC.
 266452/22 The Hit Factory Condominium v. The Tax Comm. of NYC
 250301/23 The Morgan Corp. v. The Tax Comm. of NYC
 265497/22 The Regatta Condominium v. The Tax Comm. of NYC
 258367/18 Third Colony Corp. v. The Tax Comm. of NYC
 254829/18 Vornado Westbury Retail LLC v. The Tax Comm. of NYC
 265815/20 West 19 St Owners Corp. v. The Tax Comm. of NYC
 255568/19 West 18th Ave. 330 LLC v. The Tax Comm. of NYC
 262900/22 Westerly Condominium v. The Tax Comm.
Motion
 240033/23 Egleston v. Tax Comm. of NYC Et Al
 24006/24 Egleston v. Tax Comm. of NYC Et Al

153188/22 In the Matter of The Application of The Metro. Transportation Auth. Relative To Acquiring Fee Title in Real Prop. Required For The Second Ave. Subway Project - Phase 2 v. Na 452301/25 In the Matter of The Application of The Metro. Transportation Auth. Relative To Acquiring Temporary Easements in Real Prop. Required For The Second Ave. Subway Project - Phase 2 Block 1687 v. Na 253772/23 Jeffrey L. Orenstein v. The Tax Comm. of NYC
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 264414/15Telx NY LLC v. The Tax Comm.
 254996/22 Brauser Group #1 LLC v. The Tax Comm. of NYC
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 266452/22 The Hit Factory Condominium v. The Tax Comm. of NYC
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 265497/22 The Regatta Condominium v. The Tax Comm. of NYC
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 255568/19 West 18th Ave. 330 LLC v. The Tax Comm. of NYC
 262900/22 Westerly Condominium v. The Tax Comm.
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 240033/23 Egleston v. Tax Comm. of NYC Et Al
 24006/24 Egleston v. Tax Comm. of NYC Et Al

Court Calendars

COURT NOTES

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Derefim Neckles: Approved
 Claudia Daniels-DePeyster: Approved
 Norma Jennings: Approved
 Jacqueline Williams: Approved
 Brian L. Gotlieb: Approved

District Attorney

Eric Gonzalez: Approved

QUEENS COUNTY

Civil Court, County Wide

Sheridan Chu: Approved
 Indira D. Khan: Approved
 Oma D. Phillips: Approved
 William David Shanahan: Not Approved
 Susan Silverman: Approved
 Thomas D. Barra: Not Approved

Civil Court, 1st Municipal Court District

Juliette-Noor Haji: Approved
 Thomas G. Wright-Fernandez: Not Approved
 Eve Cho Guillermo: Approved
 Stephen C. Dachter: Not Approved

Civil Court, 4th Municipal Court District

Gail A. Adams: Not Approved
 Fania Jean: Not Approved
 Mary-Ann E. Maloney: Approved

Civil Court, 5th Municipal Court District

Jennifer A. Tubridy: Approved

Supreme Court, 11th Judicial District

Sandra Perez: Approved
 Ira R. Greenberg: Approved
 Gary F. Miret: Approved
 Frances Y. Wang: Approved
 Soma S. Syed: Approved
 Gary Muraca: Not Approved
 Richard Felix: Not Approved

RICHMOND COUNTY

Civil Court, 1st Municipal Court District

Matthew J. Santamauro: Approved
 Remy Smith: Approved

Supreme Court, 13th Judicial District

Raymond L. Rodriguez: Approved
 Matthew P. Blum: Approved

BROOKLYN BAR ASSOCIATION

Ratings for Judicial Candidates For Supreme Court, Civil Court and District Attorney

The Judiciary Committee of the Brooklyn Bar Association has rated the following candidates in the upcoming election. Candidates receive one of three ratings: Approved, Not Approved or Not Approved for Failure to Participate.

Supreme Court 2nd Judicial District

Maria Aragona: Approved
 Betsy Barros: Approved
 Claudia Daniels-DePeyster: Approved
 Jill R. Epstein: Approved
 Brian L. Gotlieb: Approved
 Norma Jennings: Approved
 Carl J. Landicino: Approved
 Derefin Neckles: Approved
 Jacqueline Williams: Approved

District Attorney

Eric Gonzalez: Approved

Civil Court 2nd Municipal District

Sheridan Jack-Browne: Not approved for failure to participate

Civil Court 4th Municipal District

Chidi A. Eze: Not Approved

Civil Court 6th Municipal District

Juliet P. Howard: Approved

Civil Court 7th Municipal District

Dwayne Frankson: Not approved for failure to participate
 Dagmar Plaza: Gonzalez: Not approved for failure to participate

County Wide Civil Court

Marisa Arrabito: Approved
 Janice Chen: Approved

NASSAU COUNTY BAR ASSOCIATION

Ratings for Judicial Candidates For Surrogate and District Courts

The Judiciary Committee of the Nassau County Bar Association (NCBA) screens candidates for judicial office in a court of record which customarily holds court sessions in Nassau County and has made the following determination for candidates on the ballot in Nassau County in the November 4, 2025, election:

Surrogate Court

David P. Sullivan: Well Qualified

County Court

Nancy Nicotra Bednar: Well Qualified
 Donald X. Clavin, Jr.: Well Qualified
 Robert G. Bogle: Well Qualified
 Howard E. Sturim: Well Qualified

First Department

Appellate Term

Family Court

Robert E. Pipia: Well Qualified

District Court Judge (District 2)

Maria Boultaidakis: Well Qualified

District Court Judge (District 3)

Karen L. Moroney: Well Qualified

Diana Hedayati: Well Qualified

District Court Judge (District 4)

James A. Saladino: Well Qualified

The NCBA Judiciary Committee consists of 21 members who reflect a broad range of political participation and professional experience. The Committee determines whether candidates are "Well Qualified" for the judicial office they seek or, in the event of a negative conclusion, that the candidate is "Not Approved at this Time" for such office.

Not all candidates on the ballot are screened by the Judiciary Committee and non-Nassau County candidates may be referred to the NCBA at the request of another bar association where there is a conflict of interest.

U.S. COURT OF APPEALS FOR THE SECOND CIRCUIT

Applications Being Accepted for Position of Federal Public Defender in Connecticut

The United States Court of Appeals for the Second Circuit invites applications from qualified candidates for the position of Federal Public Defender for the District of Connecticut. The term of office is four years, with potential for appointment to successive terms. The current authorized annual salary is \$195,200.

The Federal Public Defender, functioning under the authority of 18 U.S.C. §3006A(g)(2)(A) and the Criminal Justice Act Plan for the District of Connecticut, provides criminal defense services to individuals unable to afford counsel. The Office of the Federal Public Defender for the District of Connecticut has offices in Hartford and New Haven. The Federal Public Defender supervises a staff of assistant federal defenders, research and writing attorneys, investigators, paralegals, mitigation specialists, and support personnel.

The website for the office is: <https://ctfd.org/>

Applicants must satisfy the following conditions:

(1) be a member in good standing in the bar of the state in which the candidate is admitted to practice;

(2) have a minimum of five years criminal practice experience, preferably with significant federal criminal trial experience, which demonstrates an ability to provide zealous representation of consistently high quality to criminal defendants;

(3) possess the ability to effectively administer the office, including the following management areas:

- Budget, procurement, and travel
- Human resources
- Space, facilities, and property;

(4) have a reputation for integrity; and

(5) demonstrate a commitment to the representation of those unable to afford counsel.

As the chief executive of the Office of the Federal Public Defender, the Federal Public Defender holds ultimate responsibility for the administration of the Office. The Office serves as a resource center for all practicing federal defense attorneys in the District, providing regularly scheduled training programs as well as advice and counsel when needed. The Federal Public Defender works nationally with other federal defenders on evolving issues in federal criminal law and other areas of shared concern.

The Second Circuit uses an open and competitive selection process. A Merit Selection Committee will review all applications and interview the most qualified candidates. With consideration of the District Court's recommendation, the Committee will refer the best qualified candidate to the Court of Appeals for selection and appointment. Applicants will be considered without regard to race, color, religion, sex, national origin, age, sexual orientation, or disability. The selected nominee will be required to complete a background investigation prior to appointment. The Federal Public Defender may not engage in the private practice of law.

Application forms are posted on the Court's website at <http://www.ca2.uscourts.gov>. Completed application packages must be in the format required by the Second Circuit and received no later than December 1, 2025.

FIRST DEPARTMENT

300804/23 Smith-Menjivar
Maldonado v. Maldonado**THURSDAY, NOV. 6**

365484/24 Brysha v. Brysha
365515/22 Iriti v. Pava
365222/24 Koban v. Hechler
321718/23 Swan v. Lucky
Motion
365222/24 Koban v. Hechler
Part 30V
Justice Judith N. McMahon
60 Centre Street
646-386-3275

THURSDAY, NOV. 6

805288/18C. v. Jaffe
805205/19 Mercer v. Kuo
805011/22 Schmid v. Vaezi M.D.
805202/20 Workman v. Wang

Part 33

Justice Mary V. Rosado
60 Centre Street
Phone 646-386-3894
Room 442

WEDNESDAY, NOV. 5

158258/21 Arenas v. Falcon Crest
Homeowners Assoc., Inc. Et Al
158454/23 Blandino-Perez v. Tun
Tun Auto Services Corp Et Al
162242/23 Botwin v. Ah Murray Hill
Owner LLC Et Al
156085/24 Byron v. NYC Et Al
159966/22 Cabrera v. Food Universe
Et Al
158862/21 Castro v. Turner Const.
Co. Et Al
154373/24 Cherry v. Con Ed Co. of
New York, Inc. Et Al
153127/23 Choroco v. NY Univ. Et
Al
159941/24 Chubb Nat. Ins. Co.
As Subrogee of John and Nan
Breglio v. Quality Bldg. Const.
LLC
160519/24 Costo v. Deer Mountain
Day Camp, Inc.
152633/20 Cpr 701 West 135th St. A
v. Pillori Associates
157682/23 Diaz v. 12 Furdine LLC
Et Al
161421/21 Diaz v. 76 Wadsworth
Ave. Operating Corp. Et Al
150419/21 Dow v. Jkb Franchise
Hdgs., Inc.
157589/20 Foti v. Soho Grand Hotel,
Inc.
159463/25 Garcia v. Lreal USA,
Inc. Et Al
159952/22 Godinez Ochoa v.
Gilbane Bldg. Co.
150167/24 Gomez v. Hyatt Hotels
Corp. Et Al
158718/21 Grasso v. Metro. 919 3rd
Ave. LLC Et Al
159477/25 Greenberg v. Lreal USA,
Inc. Et Al
155217/24 Haag v. Midtown Blue
Inc Et Al
159742/22 Heller v. Board of Mgrs.
of Jardin Condominium Et Al
154037/22 Horvitz v. Haroldon Corp.
Condominiums Et Al
153534/24 Infinity Auto Ins. Co. v.
Aislyun
153552/24 Infinity Auto Ins. Co. v.
German
157876/22 James v. One East River
Pl. Rty. Co. II
151744/24 Jennings v. Port Auth. of
NY and New Jersey Et Al
158718/23 Jones v. Sea Crest At
Amagansett Corp. Et Al
150388/23 Khan v. Arena Service
Co., LLC Et Al
150136/24 L.T. v. 239 East 115 St.
Housing Dev. Fund Corp. Et Al
155554/24 Lechar 1441 LLC Et Al
Wellbuilt Const. Enterprises
157714/23 Liugsha v. Welsbut
Const. Mgrs. LLC Et Al
653803/23 Lovell Safety Mgt. Co.,
LLC. v. Caritios Contracting
Corp.
150258/23 Marcelin v. Strycker's
Bay Apt. Inc Et Al
655579/24 North Mill Credit Trust v.
Nats Mountain House LLC Et Al
158268/21 Ortiz Ruiz v. SI Green
Rty. Corp. Et Al
154698/20 Pacific Indemnity Co. v.
Pearl Contracting, Inc.
152605/24 Parks v. 500 East 76th St.
LLC Et Al
154853/23 Peralta Narango v. Lex
NY Equities LLC Et Al
150974/22 Phoebeawm v. John G.
Manning Irrevocable Trust
158502/23 Plaza v. NYC Et Al
154464/23 Ramsey v. 47 Ann St.
Associates
157916/24 Reyes Juarez v. Rootop
Hosp. Group Et Al
150307/22 Rivera v. Con. Ed. Inc.
160001/21 Ritzk v. 215 West 28th St.
Prop. Owner LLC Et Al
157891/24 Rodriguez Santos v.
Structure Tone
153331/24 Rodriguez Velasquez v.
Front Wave Const. Inc. Et Al
155810/22 Salinas v. 424 West 33rd
St. LLC Et Al
160627/19 Schappert v. Metro-North
RR.
156365/22 Singh v. 88-94 St.
Nicholas Pl. Rty. Inc. Et Al
152566/22 Smith v. NYC Et Al
155708/22 Soto v. Superpark Rty.
159684/24 Stark v. Lane Office
Furniture Inc. D/b/a Lane Office
Et Al
151132/24 State Farm Fire And
Casualty Co. v. 814 Undercliff
Medical PC. Et Al
152524/24 State Farm Guaranty Ins.
Co. v. 2354 Thoracic
151218/22 Tapia v. 143-45
Wadsworth Ave. Housing Dev.
Corporation A/k/a 143-45
Wadsworth Ave. H.D.C.
655982/24 Tian v. 136 East 36th St.
Apts. Corp.
150249/21 Toth v. The Vivian
Beaumont Theater, Inc. Et Al
150376/23 Trienios v. New Tsi Hdgs.
Inc. Et Al
651333/24 Urban Holiday LLC v.
Stawski Partners Corp.
156994/20 Urena v. Danny's
Furniture Inc. Et Al
652916/23 Varney v. Laz Parking
New York/New Jersey LLC
151491/22 Vasquez v. Bop One
North End LLC Et Al
157329/23 Verdugo Viver v. Liberty
Regional Center LLC Et Al
157403/22 Walsh v. Moynihan
Interim Tenant
654329/23 Welkin Mechanical v.
NYC
152531/23 Williams v. 147-149
Second Acre.
161050/23 Yrigon v. Riverwalk 9
Motion
150136/24 T. v. 239 East 115 St.
Housing Dev. Fund Corp. Et Al

THURSDAY, NOV. 6

153284/25 Board of Mgrs. of The
Textile Bldg. Condominium v.
Board of Mgrs. of The Worth
Bldg. Condominium
655593/24 Kang Irrevocable Trust
Ex Rel. Yong Kang v. Dolgopolova
158478/25 Lotas v. Board of Mgrs. of
The 350 Condominium Et Al
100378/25 Olave v. Hamoudeh
100450/25 Pedroso v. Allen
151868/25 Promesa Foundation,
Inc. v. NYC Dept. of Housing
Preservation & Dev. Et Al
151821/23 Qi v. Hang & Associates
154513/23 Rodriguez v. Northern
Blvd 26 LLC
160069/20 Townes v. Townes
Motion
16125/21 1269 West 87th St. Apt.
Corp. Et Al v. Leeding Builders
Group LLC Et Al
156760/22 Alonso v. Doherty
152084/25 Board of Mgrs. of The
350 Condominium v. Lotas
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158478/25 Lotas v. Board of Mgrs. of
The 350 Condominium Et Al
100378/25 Olave v. Hamoudeh
100450/25 Pedroso v. Allen
151868/25 Promesa Foundation,
Inc. v. NYC Dept. of Housing
Preservation & Dev. Et Al
151821/23 Qi v. Hang & Associates
154513/23 Rodriguez v. Northern
Blvd 26 LLC
160069/20 Townes v. Townes
Motion
16125/21 1269 West 87th St. Apt.
Corp. Et Al v. Leeding Builders
Group LLC Et Al
156760/22 Alonso v. Doherty
152084/25 Board of Mgrs. of The
350 Condominium v. Lotas

153284/25 Board of Mgrs. of The
Textile Bldg. Condominium v.
Board of Mgrs. of The Worth
Bldg. Condominium
655593/24 Kang Irrevocable Trust
Ex Rel. Yong Kang v. Dolgopolova
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153284/25 Board of Mgrs. of The
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Board of Mgrs. of The Worth
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Preservation & Dev. Et Al
151821/23 Qi v. Hang & Associates
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Preservation & Dev. Et Al
151821/23 Qi v. Hang & Associates
154513/23 Rodriguez v. Northern
Blvd 26 LLC
160069/20 Townes v. Townes
Motion
16125/21 1269 West 87th St. Apt.
Corp. Et Al v. Leeding Builders
Group LLC Et Al
1567

156821/22 Yunga v. Tishman Const. Corp. of NY Et Al

Motion

654199/20 Broad St. Owner LLC v. Sander USA, Inc. Et Al

451666/18 Genetech Bldg. Systems v. Ance Corp.

651911/20 Storch Amni P.C. v. Schlauch

THURSDAY, NOV. 6

151534/23 Barbosa Oliveira v. Mepa Rty. LLC Et Al

155115/22 Gil v. 870 Riverside Drive Housing Dev. Fund

159239/20 In Re Application of The v. NYC Police

65635/18 Indic Ford Gospel v. Ambleside Partners

159859/18 Morrison Cohen Lip v. Werberger

157896/22 Stephens v. Glsc Special LLC Et Al

Motion

151534/23 Barbosa Oliveira v. Mepa Rty. LLC Et Al

159239/20 In Re Application of The v. NYC Police

159859/18 Morrison Cohen Lip v. Werberger

FRIDAY, NOV. 7

651184/20 47th Avenue Fee Owner v. Wesco Ins. Co.

152882/23 Collins v. 160 East 28th & 134 Ninth LLC Et Al

Motion

651184/20 47th Avenue Fee Owner v. Wesco Ins. Co.

Part 60 Commercial Div.

Justice Melissa A. Crane 60 Centre Street Phone 646-386-3310 Room 248

WEDNESDAY, NOV. 5

650937/2141 Vesey St. Partners (del) v. Cipriani

651312/25 Jpmdb 2018-C8 Constitution Plaza v. Berger

652038/25 Murphy v. Chubb Ins. (china) Co. Et Al

655191/24 Parachute Health v. Quest Health Solutions

63535/21 Ringel v. Ringel

163163/25 Transperfect Translations Int'l Inc. v. 1250 B'way. Associates LLC

652025/25 Uplifting Tech. Inc. Et Al v. Yu

THURSDAY, NOV. 6

652734/25 Harlow Mezz v. Global Investment Fund I Et Al

653965/25 Lepatner & Associates Lip v. Compiek Technologies

650936/23 Stilka v. Hecht

FRIDAY, NOV. 7

651906/23 One Harbor Point Square LLC Et Al v. Birch Real Estate Services LLC

Motion

651906/23 One Harbor Point Square LLC Et Al v. Birch Real Estate Services LLC

Part 61 Commercial Div.

Justice Nancy M. Bannon 60 Centre Street Phone 646-386-3169 Room 232

WEDNESDAY, NOV. 5

659802/2422nW Fund v. Lifecore Biomed. Inc. Et Al

654526/23C Opportunities Fund I v. Morgan Stanley Senior Funding, Inc. Et Al

655175/25 Rezolve Ai Plc v. Ya II Pln

Motion

659802/2422nW Fund v. Lifecore Biomed. Inc. Et Al

THURSDAY, NOV. 6

651983/24 Fortinbras Enterprises Lip Et Al v. Tigerrisk Partners LLC Et Al

651882/23 Kataman Metals v. Macquarie Futures USA

651969/24 Lexington Ave. Hotel v. 525 Lexington Owner

156838/25 Weg and Myers v. Riverside Center Site 5 Owner LLC Et Al

FRIDAY, NOV. 7

652234/25 Robinson v. Pearl Delta Funding LLC Et Al

652234/25 American Challenger Dev. Corp. v. Credit Suisse

650796/25 Fifth Ave. Surgery Center, Jcs Group Inc.

652234/25 Robinson v. Pearl Delta Funding LLC Et Al

654858/25 Shemesh v. Muchnick

659314/24 Ya II Pln v. Triller Group Inc. Et Al

Motion

652234/25 Robinson v. Pearl Delta Funding LLC Et Al

Transit Authority Settlement Part

60 Centre Street Phone 646-386-3281 Room 408

WEDNESDAY, NOV. 5

159230/19 Atabdellah v. The NYCTA Et Al

150938/18azona v. Manhattan And Bronx Surface

152497/23 Fleurant v. Metro.

Transportation Auth. Et Al

150116/18 Mooney v. NYC

153580/17 Persaud v. NYCTA

160842/18 Rodriguez v. Thompson

158552/19 Salazar v. Thompson

80 CENTRE STREET

Part 4

Justice Judy H. Kim 80 Centre Street Phone 646-386-3580 Room 308

WEDNESDAY, NOV. 5

151452/20 Cabrera v. NYCHA

150366/22 Casinathen v. Terrascent USA Inc.

157853/23 Cohen v. Metro.

Transportation Auth. Et Al

652222/25Dpt. of Housing Preservation And Dev. of NYC v. Jp Morgan Chase & Co. Et Al

161068/23 Donelli v. B'way. Const. Group LLC Et Al

161458/24 Harrison v. NYC Et Al

160180/23 Juela v. Leeding Builders Group LLC Et Al

151596/20 Leban v. McGee

Amusements Inc.

152755/20 Padro v. 107 West 106th Apt. Corp.

161489/25 Pasricha v. Bpp Pcv

Owner LLC Et Al

150204/25 Perlman v. F45 Union Square NYC Et Al

650198/25 Sclafani v. Manipal Education Americas

153055/21 Shenouda v. Board of Mgrs. of The 220

652914/25 Spark Neuro, Inc. v. Lucre

156070/20 Spiess v. NYC

156231/21 Tapia v. Augustine Real Estate Partners LLC Et Al

451628/20 Turchio v. Lacoste, USA Inc.

651175/21 Vann v. Roth

Washington Equities Ltd.

157001/22 Zhang v. Downing St. Rty. LLC. Et Al

THURSDAY, NOV. 6

654884/23/25 Operating Corp. v. Patry

655560/24 East Associates LLC. v. Hossain

160315/25 Ancon v. L&M Builders Group

151360/22 Bailey v. Rivulet Row Associates 154818/23 Bldg Mgt. Co., Inc. v. Hochszein 156796/24 Cancino v. Sagal Meat Market III, Inc. Et Al 158933/23 Coche v. Mtks Eastside Hdgs.

154809/25 Dasaro v. B & H Foto & Electronics Corp. Et Al

160096/24 Hamilton v. Hp Savoy

Par II Housing Dev. Fund Co., Inc. Et Al

158562/24 Hazel v. Morton Williams Supermarkets, Inc.

155211/21 Hernandez v. 225 5th Ave. (NY)

150163/25 Jaquez v. Hanza Rty. Co. LLC Et Al

158094/23 Jones v. NYCHA

651166/25 Karen A. Reiter As Trustee of The Sylvia Kordover-Zellin Trust v. Five Points Const.

151916/22 Kull v. Ahern Rentals

154563/24 Lola Cruz v. Subin Associates

156708/21 Manzi v. Lexington Hotel Owner LLC Et Al

158097/22 Marcellino Ramos v. Sleepy Hollow Residences LLC Et Al

157747/23 Morningside Housing Associates v. Chan

157125/20 New South Ins. Co. v. 679 McDonald Ave. Corp.

153975/24 Paucar Quito v. Britt Rty.

152573/23 Paulino v. Storage Const. Co. LLC Et Al

150231/24 Roman v. Bklyn.ear Et Al

156651/22 Scwartz v. Worldwide Ins. Brokerage

653955/25 Alternative Title Trust 2021-M1 v. Saluda Grade Alternative Title Trust 2021-M1 v. Zell

158837/24 Shih v. Nysl Up

150271/22 Travelers Prop. Casualty Co. of America A/s/o Ng 645

156209/22 Madison And Vassar Const. And Dev. Co., Inc.

156395/23 Wallace v. Occidental Fire & Casualty Co. of North Carolina

152941/24 Zaroya Rivas v. Allied

157340/21 Zoraya Rivas v. NYCTA Et Al

158721/22 Travellers Prop. Casualty Co. of America A/s/o Ng 645

150100/23 Antigua v. Doe

153962/23 Ausberto Antonomarchi A/k/a Ausberto Antonomarchi v. NYCTA Et Al

155375/24 Ahamed v. The NYCTA Et Al

155200/24 Ammarito v. Mta Const. And Dev. Et Al

157410/24 Ancona v. NYCTA Et Al

161009/23 Antigua v. Doe

153962/23 Ausberto Antonomarchi A/k/a Ausberto Antonomarchi v. NYCTA Et Al

155375/24 Beatha v. NYCTA Et Al

150597/24 Bernal v. NYCTA Et Al

156791/24 Camacho v. NYCTA Et Al

158472/24 Diaz v. Zia

150206/25 Hernandez Arita v. Motor Vehicle Accident Indemnification Corp.

150178/25 Hernandez Arita v. Motor Vehicle Accident Indemnification Corp.

150178/25 Hernandez Arita v. Motor Vehicle Accident Indemnification Corp.

150178/25 Hernandez Arita v. Motor Vehicle Accident Indemnification Corp.

150178/25 Hernandez Arita v. Motor Vehicle Accident Indemnification Corp.

| ADR Part | |
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| Phone 718-618-3081 | |
| Room 701A | |
| Part 2 | |
| Justice Elizabeth A. Taylor | |
| Phone 718-618-1275 | |
| Room 710, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 804691/250 v. NYC Et Al | |
| THURSDAY, NOV. 6 | |
| 300992/13 Jorge v. Mercedes | |
| 81187/22 Kalamata Capital Group v. Jabil Industries | |
| 812738/23 Mppey Ratty, LLC v. 1018 Morris Park Ave. Ratty, Inc. | |
| Part 3 | |
| Justice Mitchell J. Danziger | |
| Phone 718-618-1207 | |
| Room 707, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 813212/22 Ali v. Araujo Passos | |
| Part 4 | |
| Justice Andrew J. Cohen | |
| Phone 718-618-1212 | |
| Room 413, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 810066/2201 East 164th Associates LLC Et Al v. Rental & Mgt. Associates Corp. | |
| 81104/24 Brasswell v. Padilla Jimenez Olivel | |
| 818682/23 Byfield v. Adigun Powers Bridging & Scaffolding Inc. Et Al | |
| 820840/21 Clarke v. St. John's Episcopal Hosp. | |
| 806259/25 Cruz Plasencia v. Post Ave. Associates Et Al | |
| 814829/24 Cruz v. Castillo | |
| 811861/22 Cruz v. 1250 M LLC Et Al | |
| 25419/17 Diaz v. John Catsimatidis | |
| 814312/24 Faivon v. G&M Properties Hp Housing Dev. Fund Co., Inc. Et Al | |
| 30740/17 Galindez v. Con Ed | |
| 3546720/20 Gonzalez v. Leon Harary, Inc. | |
| 802954/24 Hearder v. West 137th St. | |
| 804666/23 Hornedo v. The NYCHA 27724/18 Jackson v. Seniorcare Emergency Medical | |
| 80382/24 Lopez v. St. Barnabas Hosp. Et Al | |
| 81735/24 Lopez v. Uztrans, Inc. Et Al | |
| 818903/24 Martinez v. Borjas | |
| 802675/24 Mejia v. Prods. North America, Inc. Et Al | |
| 816609/21 Mendi v. Thompson | |
| 817986/24 Morrison v. Bowman | |
| 813867/23 Moya Gonzalez v. The Church of Christ, Inc. | |
| 813023/23 Nacerino v. 286 East 163rd St. Et Al | |
| 811272/24 Novak v. Mount Hope Preservation Apts. 1a Housing Dev. Fund Co., Inc. Aka Mount Hope Housing Co., Inc. | |
| 819517/23 P. v. Westchester Square Rty. LLC Et Al | |
| 811552/24 Pinha Ogando v. Marte | |
| 803883/24 Quinonez-Mateo v. 850 Longwood Ave. Housing Dev. Fund Corp. Et Al | |
| 814042/24 Rivera v. My Pl. Family Pizza Inc. Et Al | |
| 804028/23 Robeck v. 5582 B'way | |
| 815473/25 Rodriguez v. Mammon Rty. 1967-1971 LLC Et Al | |
| 820051/23 Rodriguez v. Carlos And Gaby's of Riverdale, Inc. Et Al | |
| 804820/23 Saliu v. Burlington Coat Factory Warehouse Corp. Et Al | |
| 80863/24 Samuels v. Mullings | |
| 800183/25 Santelises Figueroa v. 1245 S LLC | |
| 806198/22 Senol v. Jonasavar Inc. Et Al | |
| 804396/22 Solano v. 3091 Ratty, LLC Et Al | |
| 807926/25 Speller v. Young Men's Christian Assoc. of Greater NY | |
| 811996/22 Surita v. Hossaini | |
| 819098/25 Teanna Pinkney v. The Chef's Warehouse Et Al | |
| 819409/23 NYC v. 1740 Lafayette Ave. Et Al | |
| 804947/25 The Plaza Rehab And Nursing Center v. Penna De Llorente | |
| 812172/24 Novak v. Mount Hope Preservation Apts. 1a Housing Dev. Fund Co., Inc. Aka Mount Hope Housing Co., Inc. | |
| 819517/23 P. v. Westchester Square Rty. LLC Et Al | |
| 811552/24 Pinha Ogando v. Marte | |
| 803883/24 Quinonez-Mateo v. 850 Longwood Ave. Housing Dev. Fund Corp. Et Al | |
| 814042/24 Rivera v. My Pl. Family Pizza Inc. Et Al | |
| 804028/23 Robeck v. 5582 B'way | |
| 815473/25 Rodriguez v. Mammon Rty. 1967-1971 LLC Et Al | |
| 820051/23 Rodriguez v. Carlos And Gaby's of Riverdale, Inc. Et Al | |
| 804820/23 Saliu v. Burlington Coat Factory Warehouse Corp. Et Al | |
| 80863/24 Samuels v. Mullings | |
| 800183/25 Santelises Figueroa v. 1245 S LLC | |
| 806198/22 Senol v. Jonasavar Inc. Et Al | |
| Part 5 | |
| Justice Alison Y. Tuitt | |
| Phone 718-618-1224 | |
| Room 415, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 28867/19 Camacho v. Batista | |
| THURSDAY, NOV. 6 | |
| 807214/24 Baez v. Beltr Diaz | |
| 801867/22 Canela v. Davson | |
| 810812/21 Gran v. Diamantis | |
| 813329/23 P. v. West 66th Sponsor LLC Et Al | |
| 818845/23 Rodriguez v. NYCHA | |
| 806239/23 Tejeda v. Citywide Mobile Response Corp. Et Al | |
| 816368/23 Urena v. Wallack Mgt. Co., Inc. Et Al | |
| Part 6 | |
| Justice Laura G. Douglas | |
| Phone 718-618-1246 | |
| Room 811, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 801513/21 Cohen v. Compass Point | |
| 802583/23 Conterras v. 1701 Eastburn Rhy. | |
| THURSDAY, NOV. 6 | |
| 812171/23 Gordon v. Espinal | |
| 805433/24 Henriquez v. Empire Precision Plastics, Inc. Et Al | |
| 808408/23 Myers v. Boris Prime Renovations | |
| 815149/24 Plasencia Marte v. J.B. Hunt Transport, Inc. | |
| Part 7 | |
| Justice Mary Lynn Nicolas-Brewster | |
| Phone 718-618-3229 | |
| Room 405, 9:30 A.M. | |
| WEDNESDAY, NOV. 5 | |
| 813588/22 Abreu v. Towns | |
| 804841/22 Alvizu v. Mochiah | |
| 809505/23 Baker v. Parkash | |
| 82042/19 Bass v. Bedaba | |
| 801366/24 Bonilla v. Ransom | |
| 820231/23 Britt v. Omifosye | |
| 8215/19 Cabral v. Pen | |
| 82403/20 Cabrera v. Cordero | |
| 80300/24 Camacho v. Hassan | |
| 801273/24 Cardenas v. Uber Technologies, Inc. Et Al | |
| 8050/19 Centeno-Maireno v. Coates | |
| 820163/25 Concern Inwood Housing Dev. Fund Corp. Et Al v. 1331 Jerome Ave. Housing Dev. Fund Corp. Et Al | |
| 808274/25 Henriquez v. Ortiz | |
| 80358/21 Jones v. NYCHA | |
| 809301/25 Henry v. NYC Et Al | |
| 8159/25 In the Matter of The Application of Mayeli Hernandez Et Al v. NYCTA Et Al | |
| 81970/20 Bedford v. NYC Et Al | |
| 804821/20 Bedolla v. NYC Et Al | |
| 809503/24 Boudreau v. Francisco-Cabral | |
| 816395/25 Griffith v. NYC Et Al | |
| 801682/24 Griffiths v. NYC Et Al | |
| 80358/21 Grifiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
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| 809503/24 Boudreau v. Francisco-Cabral | |
| 816395/25 Griffith v. NYC Et Al | |
| 801682/24 Griffiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
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| 804821/20 Bedolla v. NYC Et Al | |
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| 816395/25 Griffith v. NYC Et Al | |
| 801682/24 Griffiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
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| 809503/24 Boudreau v. Francisco-Cabral | |
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| 801682/24 Griffiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
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| 809503/24 Boudreau v. Francisco-Cabral | |
| 816395/25 Griffith v. NYC Et Al | |
| 801682/24 Griffiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
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| 809503/24 Boudreau v. Francisco-Cabral | |
| 816395/25 Griffith v. NYC Et Al | |
| 801682/24 Griffiths v. NYC Et Al | |
| 809301/25 Henry v. NYC Et Al | |
| 8159/25 In the Matter of The Application of Mayeli Hernandez Et Al v. NYCTA Et Al | |
| 81970/20 Bedford v. NYC Et Al | |
| 804821/20 Bedolla v. NYC Et Al | |
| | |

CRIMINAL TERM**Part SCA**

Justice Rivera
Phone 718-618-1078
265 East 161st Street
Room 300, 9:30 A.M.

**Part T11
(Trial)**

Justice Mitchell
Phone 718-618-1076
265 East 161st Street
Room 450, 9:30 A.M.

Part C

Justice Lieb
Phone 718-618-1097
265 East 161st Street
Room 320, 9:30 A.M.

Part IDV-SCT

Justice Flores
Phone 718-618-1067
265 East 161st Street
Room 420, 9:30 A.M.

Part JD/T

Justice Lieb
Phone 718-618-1097
265 East 161st Street
Room 340, 9:30 A.M.

Part TRP

Justice Fabrizio
Phone 718-618-1103
265 East 161st Street
Room 340, 9:30 A.M.

Part 11

Justice Mitchell
Phone 718-618-1076
265 East 161st Street
Room 450, 9:30 A.M.

Part 12

Justice Michelis
Phone 718-618-3623
265 East 161st Street
Room 570, 9:30 A.M.

Part 14

Justice Busching
Phone 718-618-1034
265 East 161st Street
Room 660, 9:30 A.M.

Part 15

Justice Tba
265 East 161st Street
9:30 A.M.

Part 16

Justice Bruce
Phone 718-618-1043
265 East 161st Street
Room 540, 9:30 A.M.

Part 17

Justice Tbd
Phone 718-618-1106
265 East 161st Street
Room 350, 9:30 A.M.

Part 18

Justice Yearwood
Phone 718-618-3629
265 East 161st Street
9:30 A.M.

Part 19

Justice Collins
Phone 718-618-1058
265 East 161st Street
Room 550, 9:30 A.M.

Part 21

Justice Powell
Phone 718-618-1133
265 East 161st Street
Room 690, 9:30 A.M.

Part 22

Justice McCormack
Phone 718-618-1001
265 East 161st Street
Room 600, 9:30 A.M.

Part 23

Justice Villegas
Phone 718-618-1046
265 East 161st Street
Room 380, 9:30 A.M.

Part 24

Justice Hornstein
Phone 718-618-1073
265 East 161st Street
Room 440, 9:30 A.M.

Part 27 (DV)

Justice Stone
Phone 718-618-1031
265 East 161st Street
Room 590, 9:30 A.M.

Part 28

Justice Clancy
Phone 718-618-3638
265 East 161st Street
Room 560, 9:30 A.M.

Part 29

Justice Rodriguez-Morick
Phone 718-618-1118
265 East 161st Street
Room 430, 9:30 A.M.

Part 31

Justice Zimmerman
Phone 718-618-1022
265 East 161st Street
Room 670, 9:30 A.M.

Part 32

Justice Rosenblueth
Phone 718-618-1019
265 East 161st Street
Room 500, 9:30 A.M.

Part 60

Justice Barrett
Phone 718-618-1007
265 East 161st Street
Room 620, 9:30 A.M.

Part 70

Justice Lewis
Phone 718-618-1103
265 East 161st Street
Room 340, 9:30 A.M.

Part 71

Justice Steed
Phone 718-618-1004
265 East 161st Street
Room 610, 9:30 A.M.

Part 73

Justice Tba
Phone 718-618-1085
265 East 161st Street
Room 510, 9:30 A.M.

Part 75

Justice Bruce
Phone 718-618-1043
265 East 161st Street
Room 540, 9:30 A.M.

Part 77

Justice Parker
Phone 718-618-1025
265 East 161st Street
Room 680, 9:30 A.M.

Part 96

Justice Morales
Phone 718-618-1082
265 East 161st Street
Room 460, 9:30 A.M.

SURROGATE'S COURT

Surrogate
Nelida Malave-Gonzalez
Phone 718-618-2350
Courtroom 406

Second Department**APPELLATE DIVISION****THURSDAY, NOV. 6**

10 A.M.

Court To Be Held in Brooklyn, NY

THURSDAY, NOV. 13

10 A.M.

Court To Be Held in Brooklyn, NY

Barros, J.P., Christopher, Landino and Love, J.J.

22/07150 People v. Griffiths, David (Q)

24/05218 People v. Karkowsky, Judith (N)

24/04591 Matter of Mender v. Greenfield (N)

24/02852 Matter of C. (Anonymous), Christian, J.; New Alternatives for Children (Q)

24/10315 Suarez v. City of New York (K)

24/04431 Correa v. NY Developers & Management LLC (K)

24/08992 Matter of Szypula v. Szypula (P)

21/02849 Craig v. Raju (N)

24/11413 Nassau Point Property Owners Association, Inc. v. Geroulatos (S)

22/07195 Williams v. New York City Office of Chief Medical Examiner (K)

20/04287 Chaya v. Maimonides Medical Center (K)

22/02707 v. Vyskočil (W)

24/04979 Matter of Thompson v. Brann (Q)

24/07373 HSBC v. Grant (K)

FRIDAY, NOV. 7

10 A.M.

Court To Be Held in Brooklyn, NY

Connolly, J.P., Wooten, Ventura and Hom, J.J.

22/02614 People v. Henry, Ian (K)

24/05084 People of State of New York v. Cambaretta (S)

23/03434 People v. Carmona, Vincent (K)

23/08050 People v. Jia Liu (K)

20/06838 Kelia Tenny, Inc. v. Mount Vernon (W)

24/02499 Kelia Tenny, Inc. v. City of Mount Vernon (W)

24/07502 Alii v. City of New York (K)

23/10655 Gates, LLC v. Throop & Gates, Inc. (K)

24/07816582 Gates, LLC v. Throop & Gates, Inc. (K)

24/07844092 Rosenzweig v. Singer (K)

20/08706 Rosenzweig v. Singer (K)

21/00162 Rosenzweig v. Singer (K)

22/04653 Jones v. Delta Environmental, Inc. (N)

24/08310 Jackson v. 965 Greene Holding Corp. (K)

21/01284 M. Parrinello (S)

20/06992 Smith v. Maines Paper & Food Service, Inc. (O)

24/09076 Kinard v. NYCHA (K)

MONDAY, NOV. 10

10 A.M.

Court To Be Held in Brooklyn, NY

Chambers, J.P., Wooten, Ventura and Goldberg Velazquez, J.J.

22/04129 People v. Picart, Joe (K)

22/04479 People v. Smith, Leslie (K)

21/01408 People v. Dennis, Sunetta (S)

21/03280 People v. Hasper, William (N)

24/11063 Matter of Davis v. ACS-Kings (K)

24/0652 Matter of N. (Anonymous), Daisy, M. (Anonymous), Jacob (Q)

24/08169 Matter v. D. (Anonymous), Winter; Administration for Children's Se (K)

24/05940 Gawel v. Roman Catholic Diocese of Brooklyn (K)

24/09936 Davis v. Rodriguez (K)

24/08036 Cherry v. Food Bank for New York City (K)

23/08436 Matter of Anderson v. New York State Division of Housing and Community (K)

23/07406 Deutsche Bank National Trust Company v. Ghosh (N)

23/06747 Port Grove Associates v. State of New York (NYS)14

24/08063 Castro v. Castro (O)

24/11737 Travelers Excess & Surplus Lines Company v. Via Trivio Corporation (N)

24/20737 Ward v. Eldon (K)

25/03550 Ledeo v. Stewart (S)

22/07379 Mercado v. Rulli (K)

23/08591 Leone v. R&J Realty Company LLC (Q)

23/08597 Leone v. R&R Realty Company LLC (Q)

APPELLATE TERM**2ND, 11TH and 13TH JUDICIAL DISTRICT**

BROOKLYN, NY

Day Calendar

WEDNESDAY, NOV. 5

9:30 A.M.

Toussaint P.J., Mundy and Ottley JJ.

24/08747 Sergey Kalitenko, Md., As Assignee of Wascar Gomez-Hernandez v. Nationwide Mutual Insurance Company (RI)

24/11514 American Transit Insurance Company v. Huntington Hospital (K)

24/11516 American Transit Insurance Company v. SCOB, LLC (K)

24/13443 O. Diocese of Brooklyn (S)

24/07507 B. (Anonymous), J. (Anonymous), Joshua (K)

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Contact: Carol Robertson

Phone: 212.457.7850

Email: crobertson@alm.com

FOUNDATIONS

THE ANNUAL RETURN OF Gladys and Roland Harriman Foundation. For the calendar year ended 2024 is available at its principal office located at 140 Broadway, 6th Floor, New York, NY 10005 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Etta Reyes. 16550 n4

THE ANNUAL RETURN OF HARRY FEINBERG FAMILY FOUNDATION for the Calendar year ended December 31, 2024 is available at its principal office located at 300 E 74TH ST #35F, NEW YORK, NY 10021 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is HARRY FEINBERG. 16533 n4

THE ANNUAL RETURN OF IRENE R. & NATHANIEL M. AYCOCK FOUNDATION for the Calendar year ended December 31, 2024 is available at its principal office located at 7 COBBLESTONE COURT, CENTERPORT, NY 11721 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is JEREMY KRAMER. 16563 n4

THE ANNUAL RETURN OF MARY W. HARRIMAN FOUNDATION. For the calendar year ended 2024 is available at its principal office located at 140 BROADWAY, 6TH FL New York, NY 10005 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Etta Reyes. 16547 n4

THE ANNUAL RETURN OF RUTH LOEWENSTEIN CHARITABLE FOUNDATION for the Calendar year ended December 31, 2024 is available at its principal office located at 7 COBBLESTONE COURT, CENTERPORT, NY 11721 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is ALICE H. ROSEN. 16527 n4

THE ANNUAL RETURN OF SOLOMON J. AND EDITH K. FREEDMAN CHARITABLE FOUNDATION for the Calendar year ended December 31, 2024 is available at its principal office located at 7 COBBLESTONE COURT, CENTERPORT, NY 11721 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is JEREMY KRAMER. 16571 n4

THE ANNUAL RETURN OF THE MJK FAMILY FOUNDATION. For the calendar year ended December 31, 2024 is available at its principal office located at c/o Certy Partners 99 Park Avenue, 16th Floor, New York, NY 10016, for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is KEITH M. BRANDOFINO, ESQ., Court Appointed Referee Baker & Hostetler LLP Attorney(s) for Plaintiff 45 Rockefeller Plaza, New York, New York 10111. 15807 o27-TuWTh n14

THE ANNUAL RETURN OF THE SHIKIAR FAMILY FOUNDATION. For the year ended November 30, 2024 is available at its principal office located at 30 East 85th Street, Unit 24B New York, NY 10028 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Stuart A. Shikiar. 16262 n4

THE ANNUAL RETURN OF THE S. H. Foundation For the Fiscal year ended 12/31/2024 is available at its principal office located at 158 Danbury Road, Suite 5, Ridgefield, CT 06877 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Leslie Patel. 16343 n4

THE ANNUAL RETURN OF THE DAVID J. MASTROCOLA FOUNDATION For the Fiscal year ended 12/31/2024 is available at its principal office located at 15 West 63rd Street, New York, NY 10023 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Richard Feldman. 16345 n4

THE ANNUAL RETURN OF THE DAVID HALL GMELICH MEMORIAL SCHOLARSHIP FUND For the Fiscal year ended 4/30/2025 is available at its principal office located at 79 Rumson Road, Rumson, NJ 07760 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Victoria Gmelich. 16349 n4

THE ANNUAL RETURN OF THE FRESTON FAMILY FOUNDATION For the Fiscal year ended 12/31/2024 is available at its principal office located at 57 East 66th Street, New York, NY 10021 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Thomas Freston. 16346 n4

THE ANNUAL RETURN OF THE GEORGINA HIDEN CHARITABLE FOUNDATION. For the fiscal year ended Aug 31, 2024 is available at its principal office located at 15 The Lane, Oyster Bay, NY 11771 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Richard Feldman. 16347 n4

THE ANNUAL RETURN OF THE WENDY E. SCRIPPS FOUNDATION For the Fiscal year ended 12/31/2024 is available at its principal office located at 494 Eighth Avenue, New York, NY 10001 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Richard Feldman. 16344 n4

THE ANNUAL RETURN OF THE UTOPIA FUND For the Fiscal year ended 12/31/2024 is available at its principal office located at 158 Danbury Road, Suite 5, Ridgefield, CT 06877 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Leslie Patel. 16344 n4

THE ANNUAL RETURN OF THE WENDY E. SCRIPPS FOUNDATION For the Fiscal year ended 12/31/2024 is available at its principal office located at 494 Eighth Avenue, 16th Floor, New York, NY 10001 for inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Richard Feldman. 14992 S30 T N04

THE ANNUAL RETURN OF THE NATASHA COLYN STUDIOS LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 8/12/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 447 West 18th Street, New York, NY 10011. Purpose: any lawful act. 14971 S30 T N04

THE ANNUAL RETURN OF THE TEAMSA2025 LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 9/25/2025. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to: 72 New Hyde Park Rd., Franklin Square, NY 11010. Purpose: any lawful act. 14952 S30 T N04

THE ANNUAL RETURN OF THE SUTPHIN LLC. Filed with SSNY on 09/23/2025. Office: Nassau County. SSNY designated as agent for process & shall mail to: 144 SEA CLIFF AVE., GLEN COVE, NY 11542. Purpose: any lawful act. 14961 S30-Tu n4

FOUNDATIONS

THE ANNUAL RETURN OF THE MARION AND BEN DUFFY FOUNDATION. For the calendar year ended 2024 is available at its principal office located at 420 Lexington Avenue, Suite 312, New York, NY 10170 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is James P. Sauter. 16511 n4

THE ANNUAL RETURN OF THE MECKER FOUNDATION INC. For the fiscal year ended Oct 31, 2024, is available at its principal office located at 435 East 52nd Street, Apt 16C2, New York, NY 10022 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Alan Meckler. 16519 n4

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SALES

NOTICE OF FORECLOSURE SALE FOR REAL PROPERTY

SUPREME COURT - STATE OF NEW YORK COUNTY OF NEW YORK SCOPE: LEASING, INC Plaintiff - against: EILEEN M. PATRICK, et al Defendant(s) Pursuant to that certain Order of Judgment dated May 2, 2025 and entered on July 31, 2025 ("Judgment"), I, the undersigned Referee will sell at public auction in Room 130, or such other location within the Courthouse as may be designated, of the New York County Courthouse ("Courthouse"), 60 Centre Street, New York, New York 10007 on November 19th, 2025 at 2:15 p.m., prevailing Eastern Time, that certain premises situated, lying and being in the Borough of Manhattan, City, County and State of New York, bounded and described as follows: BEGINNING at a point on the southerly side of 87th Street, distant 170 feet northwesterly from the corner formed by the intersection of the southerly side of 87th Street with the westerly side of Avenue A, which point is opposite the Centre of a party wall; being a plot 100 feet 8 1/2 inches by 20 feet by 100 feet 8 1/2 inches by 20 feet, Block: 1566 Lot: 131 ("Premises"). Said premises is known as and located at 438 EAST 37TH STREET, NEW YORK, NEW YORK 10128. The approximate amount of the lien is \$8,849,991.69, plus default interest & costs thereon from and after May 2, 2025. Premises will be sold subject to provisions of the filed Judgment and forthcoming terms of sale. Index Number 652871/2024. KEITH M. BRANDOFINO, ESQ., Court Appointed Referee Baker & Hostetler LLP Attorney(s) for Plaintiff 45 Rockefeller Plaza, New York, New York 10111. 15807 o27-TuWTh n14

14984 S30-Tu n4

14984 S30-Tu n4