

SUPREME COURT : STATE OF NEW YORK
COUNTY OF NEW YORK

SUSAN CHARNEY,

Plaintiff,

-against-

NORTH JERSEY TRADING CORPORATION
ALEXANDER FRIED, JUDITH HERSKOWITZ

Defendants.

IAS Part 30 Heitler J

Index No. 24517/88

**REQUEST FOR
EVIDENTIARY HEARING**

Pursuant to CPLR 2218, Judith Herskowitz hereby requests oral argument upon her cross-motion that was returnable on September 30, 2005, raising factual issues which if disputed are determinable solely by evidentiary hearing or trial, and particularly with reference to disputed issues related to the record that cannot be resolved upon oral argument. A half day is requested for such hearing.

Dated: October 17, 2005
Miami Beach Florida

Respectfully submitted,

JUDITH HERSKOWITZ J.D.
Defendant Pro se
P.O. Box 403543
Miami Beach, Fl. 33140
Tel:(305) 534-7600

By: _____
JUDITH HERSKOWITZ

SUPREME COURT :STATE OF NEW YORK
COUNTY OF NEW YORK

IN THE MATTER OF THE APPLICATION OF

Index No. 23002/92

JUDITH HERSKOWITZ, et. al.,

Petitioners,

IAS Part 30 Heitler J

For a Judgment under Article 78 etc.,

-against-

HON. HAROLD J. TOMPKINS, etc.,

Respondent,

SUSAN CHARNEY, etc.,

Additional Respondent

**REPLY TO WINDELS' MEMORANDUM OF LAW
IN OPPOSITION TO MOTION
TO VACATE AND RENEW AND REARGUE AND FOR RESTITUTION**

In view of the fact that Paul Windels III has never ever been appointed a receiver in the above entitled case and is not a party in any capacity Judith Herskowitz had served Windels with a Notice of Rejection of his Memorandum of Law etc., (attached hereto) and returned his Memorandum in Opposition. Accordingly, Windels has no standing to file papers in this case. At any rate the Memorandum in Opposition submitted by Windels in this case is identical to the one he submitted under Index No. 24517/88 to which Herskowitz is concurrently submitting her Reply and her Reply would be the same in this case.

Dated: September 13, 2005
Miami Beach Florida

Respectfully submitted,

JUDITH HERSKOWITZ J.D.
Defendant Pro se
P.O. Box 403543
Miami Beach, Fl. 33140
Tel:(305) 534-7600

By: _____
JUDITH HERSKOWITZ

SUPREME COURT : STATE OF NEW YORK
COUNTY OF NEW YORK

IAS Part 30 Heitler J

SUSAN CHARNEY,

Index No. 24517/88

Plaintiff,

-against-

NORTH JERSEY TRADING CORPORATION
ALEXANDER FRIED, JUDITH HERSKOWITZ

Defendants.

- 1. REQUEST FOR EVIDENTIARY HEARING**
 - 2. NOTICE OF REJECTION OF WINDELS' MEMORANDUM OF LAW
IN OPPOSITION TO MOTION TO VACATE AND RENEW**
 - 3. REPLY TO WINDELS' MEMORANDUM OF LAW
IN OPPOSITION TO MOTION TO VACATE AND RENEW ETC.,**
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JUDITH HERSKOWITZ J.D.
Defendant Pro se
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