

SUPREME COURT : STATE OF NEW YORK
COUNTY OF NEW YORK

SUSAN CHARNEY,

Plaintiff,

-against-

DOCUMENT
PRODUCTION
DEMAND

NORTH JERSEY TRADING CORPORATION,
ALEXANDER FRIED, JUDITH HERSKOWITZ,
[REDACTED]
[REDACTED],

Index No. 24517/88

Defendants.

Please take notice, pursuant to C.P.L.R. 3120, that Susan Charney individually and Susan Charney on behalf of North Jersey Trading Corporation ("Charney") produce for inspection and copying, on August 5, 2003 documents and materials or copies thereof which are in Charney's or her attorney Steven Delibert's possession, custody and control as requested below. In lieu of appearing and personally delivering the requested documents, since Judith Herskowitz is a citizen and resident of Miami Dade County, Florida and she has been served at her Florida address in the above entitled case, however without conceding personal jurisdiction it is hereby requested that Charney (Delibert) send by U.S. mail to Judith Herskowitz to her address in Florida, P.O. Box 403543, Miami Beach, Florida 33140 true and accurate copies of the documents requested below. However, a New York address is hereby supplied as well, for delivery of the requested documents and materials or copies thereof at ABC Process Service, 225 Broadway, New York N.Y. 10007 Suite 2410 in case Charney (Delibert) would refuse the requested co-operation. The documents and materials or true and accurate copies of the documents and materials requested herein are as follows:

The full and absolute satisfactions of the judgments No. 1, 3, 4, 5, and 6 Corporation to [REDACTED] from Charney individually and as individual shareholder of North Jersey Trading Corporation and/or as Charney on behalf of North Jersey Trading Corporation and/or Karen Bezner as Trustee for North Jersey Trading Corporation and/or Paul Windels III as receiver for North Jersey Trading Corporation to [REDACTED] and [REDACTED] as to the following judgments:

Susan Charney v. North Jersey Trading Corporation, Judith Herskowitz, [REDACTED] [REDACTED] Index No. 24517/88 judgment entered on November. 22, 1993 against [REDACTED] and [REDACTED] Herskowitz in favor of Susan Charney on behalf of North Jersey Trading Corp. for 4,251, 947.87 and in favor of Susan Charney individually for \$935.00 ("Judgment No. 1");

Susan Charney vs. North Jersey Tradina Como.. Alexander Fried, Judith Herskowitz, Robert Herskowitz and Mark Herskowitz, Index number 24517/1988, judgment entered August 24, 1992, against Judith Herskowitz, Robert Herskowitz, and Mark Herskowitz, in favor of Susan Charney on behalf of Steven Delibert, Esq. for \$5,000.00 for sanctions ("Judgment No. 3");

Susan Charney vs. North Jersey Tradina Coro.. Alexander Fried, Judith Herskowitz, Robert Herskowitz, and Mark Herskowitz, Index number 24517/1988, judgment dated January 19, 1993 and entered February 10, 1993, against Judith Herskowitz, Robert Herskowitz and Mark Herskowitz, in favor of Susan Charney individually for \$23,500.00 as contempt fines ("Judgment No. 4");

Judith Herskowitz, individually as the guardian of Alex Fried, Robert Herskowitz, and Mark Herskowitz vs. Honorable Harold J. Tomokins, New York Appellate Division, First Department original No. 6022/1992, sanctions ordered June 23, 1992, corrected order July 10, 1992, judgment entered on remand dated August 18, 1992, Supreme Court, New York County Index number 23002/1992, against Judith Herskowitz, Robert Herskowitz and Mark Herskowitz, in favor of Susan Charney individually, \$5,650.00 ("Judgment No. 5");

Judith Herskowitz, Robert Herskowitz, and Mark Herskowitz vs. Honorable Harold J. Tompkins, Supreme Court, New York County No. 23002/1992, judgment dated January 19, 1993, against Judith Herskowitz, Robert Herskowitz, and Mark Herskowitz, in favor of Susan Charney individually for contempt fine, \$7,000.00 ("Judgment No. 6"); and


A judgment by Charney from the United States District Court for the Southern District of New York, in the matter entitled No. 93 CIV 5248 MGC, in the amount of \$4,410.00 dated and entered on March 10, 1995, for sanctions (the "Federal District Court judgment").

Any other relevant papers received on the settlement of the above named judgments from Charney individually and as individual shareholder of North Jersey Trading Corporation and/or as Charney on behalf of North Jersey Trading Corporation and/or Karen Bezner as Trustee for North Jersey Trading Corporation and/or Paul Windels III as receiver for North Jersey Trading Corporation.

Time sheets on the fees requested by Steven Delibert in Motion In Support on
Motion Directing Disbursement of Assets.

Dated: Miami Beach, Fl.
July 14, 2003

JUDITH HERSKOWITZ J.D.
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

SUSAN CHARNEY,

Plaintiff,
-against-

**DOCUMENT
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NORTH JERSEY TRADING CORPORATION,
ALEXANDER FRIED, JUDITH HERSKOWITZ,
[REDACTED] and [REDACTED]
[REDACTED]

Index No. 24517/88

Defendants.

Please take notice, pursuant to N.Y. § BCL 624 and N.Y.BCL Article 12 (including §1207, and §1216 that Paul Windels III, (who stated he is a party) designated as the receiver for the property for North Jersey Trading Corporation ("North Jersey") produce for inspection and copying, on August 25, 2003 documents and materials or copies thereof which are in Paul Windels' III possession, custody and control as requested below. In lieu of appearing and personally delivering the requested documents, since Judith Herskowitz is a citizen and resident of Miami Dade County, Florida and she has been served at her Florida address in the above entitled case, it is hereby requested that Paul Windels III, send by U.S.mail to Judith Herskowitz to her address in Florida, P.O. Box 403543, Miami Beach, Florida 33140 true and accurate copies of the documents requested below. However, a New York address is hereby supplied as well, for delivery of the requested documents and materials or copies thereof at ABC Process Service, 225 Broadway, New York N.Y. 10007 Suite 2410 in case Paul Windels III would refuse the requested co-operation. The documents and materials or true and accurate copies of the documents and materials requested herein are as follows:

Books, records and any other documentation evidencing the purported receipt of the transfer of funds alleged to have been made in the sum of \$663,759.68 (or whatever other sum it may have been) from Karen Bezner as trustee for North Jersey to Paul Windels III as receiver at or around April 30, 2003 as verified in Windels III's Affirmation on May 28, 2003. This is to include the name and address of the bank and/or institution where the alleged transfer was received, the account number and/or any other identifying number and the same information as to any other transfer of these funds by Paul Windels III to the present (to the date of production of the documents).

Books, records and any other documentation showing the name and address of the bank and/or of the institution and account numbers and/or any other identifying number evidencing where Paul Windels III, presently holds as receiver the alleged sum of \$682,225.89 (or whatever other sum it maybe) as verified in Windels' Affirmation on May 28, 2003.

Susan Charney vs. North Jersey Zradina Como., Alexander Fried, Judith Herskowitz. [REDACTED], Index number 24517/1988, judgment entered August 24, 1992, against Judith Herskowitz, [REDACTED], in favor of Susan Charney on behalf of Steven Delibert, Esq. for \$5,000.00 for sanctions ("Judgment No. 3");

Susan Charney vs. North Jersey Tradina Coro., Alexander Fried, Judith Hersko-witz. [REDACTED], Index number 24517/1988, judgment dated January 19, 1993 and entered February 10, 1993, against Judith Herskowitz, [REDACTED] and [REDACTED], in favor of Susan Charney individually for \$23,500.00 as contempt fines ("Judgment No. 4");


Judith Herskowitz, individually as the guardian of Alex Fried. [REDACTED] Herskowitz, and [REDACTED] vs. Honorable Harold J. Tomokins., New York Appellate Division, First Department original No. 6022/1992, sanctions ordered June 23, 1992, corrected order July 10, 1992, judgment entered on remand dated August 18, 1992, Supreme Court, New York County Index number 23002/1992, against Judith Herskowitz, [REDACTED] and [REDACTED], in favor of Susan charney individually, \$5,650.00 ("Judgment No. 5");

Judith Herskowitz, [REDACTED] and [REDACTED] vs. Honorable Harold J. Tompkins. Supreme Court, New York County No. 23002/1992, judgment dated January 19, 1993, against Judith Herskowitz, [REDACTED], [REDACTED], and [REDACTED], in favor of Susan Charney individually for contempt fine, \$7,000.00 ("Judgment No. 6"); and

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Dated: Miami Beach, Fl.
August 4, 2003

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


By: 
JUDITH HERSKOWITZ

Books, records and any other documents in the intervening period between April 30, 2003 to the present, showing the activity in a bank and/or in any other institution where the said funds were placed or deposited initially in the sum of \$663,759.68 (or whatever other sum it may have been) to what it is alleged to be in current sum of \$682,225.89 (or whatever other sum it maybe) as verified in Windels III's Affirmation on May 28, 2003. These are including but not limited to, any and all ledger cards, ledger books, book of records, monthly statements and/or other periodical statements, records of deposits, deposit slips, records of payment, canceled checks, correspondence, memoranda, withdrawals, disbursements, payments made and transfers.

Also copies of all tax returns, federal, state, city etc., on behalf of North Jersey from April 2003 to the present.

Dated: Miami Beach, Fl.
August 4, 2003

JUDITH HERSKOWITZ J.D.
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

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Plaintiff,

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NORTH JERSEY TRADING CORPORATION,
ALEXANDER FRIED, JUDITH HERSKOWITZ,
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Defendants.

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Dated: Miami Beach, Fl.
August 4, 2003

JUDITH HERSKOWITZ J.D.
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By: Judith Herskowitz
JUDITH HERSKOWITZ