

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JACOB TEITELBAUM, Individually and as father to  
CHILD A and CHILD B,

Plaintiff,

-against-

**ATTORNEY  
AFFIRMATION**

JUDA KATZ; CHAYA KATZ; JOEL TENNENBAUM;  
BLUMA TENNENBAUM; DAVID RUBENSTEIN;  
KIRYAS JOEL COMMUNITY AMBULANCE  
CORPORATION; ATTY. MARIA PETRIZIO;  
CHILDREN'S RIGHTS SOCIETY, INC.;  
ATTY. KIM PAVLOVIC; ATTY JOHN FRANCIS X.  
BURKE; COUNTY OF ORANGE; CHRISTINE BRUNET;  
ATTY. STEPHANIE BAZILEOR; DAVID HOLLANDER;  
MIRIAM TEITELBAUM; JOHN DOES 1 THROUGH 95;  
JANE DOES 1 THROUGH 20,

12-CV-02858 (VB)

Defendants.  
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**TERENCE S. HANNIGAN**, an attorney duly admitted to practice law before the United States District Court for the Southern District of New York, declares the following to be true and correct under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am a member of Hannigan Law Firm PLLC, the attorneys for Defendant David Rubenstein (hereinafter "defendant"). As such, I am fully familiar with the prior proceedings and papers filed in this action.

2. I submit this affirmation in opposition to plaintiff's "Motion for Extrinsic Fraud Inquest" (Document Nos. 222-223). The motion papers are devoid of any factual or good-faith basis for plaintiff's assertions that defendant has perpetrated a fraud upon this Court, or that the Court itself has committed any wrongdoing.

3. Plaintiff's omission is noteworthy because it is indicative of the fact that there is no good-faith basis for either his present allegations or his request. As here, defendant has, at all times, filed and served motion and opposition papers in response to some pleading or motion brought by plaintiff. Defendant is similarly unable to identify any wrongdoing committed by this Court.

4. As the Second Circuit stated in Lau v. Meddaugh (229 F.3d 121, 123 [2000]), "district courts have the power and the obligation to protect the public and the efficient administration of justice from individuals who have a history of litigation entailing vexation, harassment and needless expense to other parties and an unnecessary burden on the courts and their supporting personnel." Similarly, in Viola v. United States (481 Fed. Appx. 30, 31 [2d Cir. 2012]), that Court held "[e]very paper filed with the Clerk of this Court, no matter how repetitious or frivolous, requires some portion of the institution's limited resources, [and] a part of the Court's responsibility is to see that these resources are allocated in a way that promotes the interests of justice."

**WHEREFORE**, your affiant respectfully requests that this Court deny plaintiff's "Motion for Extrinsic Fraud Inquest," together with any other and further relief as it deems just and proper under the circumstances.

Dated: June 7, 2013

Hannigan Law Firm PLLC

By: s/TERENCE S. HANNIGAN  
(Bar No. TH0507)  
*Attorney for Defendant,*  
*David Rubenstein*  
Office and P.O. Address  
1881 Western Avenue, Suite 140  
Albany, NY 12203  
Phone: (518) 869-9911