CV 17-0177934	**SUPERIOR COURT**
STATE OF CONNECTICUT	**JD OF NEW HAVEN**
VS.	**AT NEW HAVEN**
DANIEL GREER	**AUGUST 16, 2019**

MOTION OF LAWRENCE DRESSLER FOR ACCESS TO COURT PROCEEDINGS

The undersigned, ie., Lawrence Dressler, hereinafter referred to as "Dressler" has been advised that he has been named as a witness by the Defendant Daniel Greer, hereinafter referred to as "Greer." Dressler anticipates that Greer will request that this Court issue an order of sequestration under § 54-85a of the Connecticut General Statutes barring Dressler from all Court proceedings. Dressler requests that an order issue allowing Dressler full access to the Court proceedings, on the following grounds:

1. Dressler was not a witness to any of the facts or allegations set forth in the pleadings, affidavits, arrest warrants, search warrants or any other document prepared and filed by the State of Connecticut in this matter. Dressler has not spoken with Greer in many years. The testimony of Dressler would not be relevant nor assist in Greer's defense in any way;

2. Dressler has publicly advocated for the arrest, conviction and incarceration of Greer for several years. Dressler has advocated for said arrest on a blog he created in 2015, ie., www.larrynoodles.com.

3. Greer has sued Dressler for defamation in the case of Daniel Greer v. Lawrence Dressler, CV16-6063513-S. Greer alleged in said case that Dressler defamed Greer when Dressler stated that Greer paid "hush money" to a victim of child molestation. Greer never alleged in said defamation case that Dressler's statements

that Greer was a pedophile were false, untrue or defamatory. Greer's defamation case is scheduled for trial on October 31, 2019.

4. During the Federal civil child sexual molestation trial of Mirlis v. Greer, 16-CV-00678, in which a jury awarded the Mr. Mirlis $15 million, Greer filed an application for a protective order against Dressler. See Attached Exhibit A, Application for Civil Protective Order. Greer's attorneys presented said unsigned restraining order application to Federal Judge Shea and advised Judge Shea that said application had been granted. Said attorneys were admonished by Judge Shea after Dressler pointed out that said restraining order was neither signed nor granted by any Superior Court Judge. See Exhibit B transcript of Federal Court hearing, pages 8-11. Greer, and his attorneys, never appeared at the hearing that the Superior Court scheduled for said restraining order application. Said restraining order was never heard, nor granted by any Court.

5. During the Federal civil child sexual molestation trial of Mirlis v. Greer, 16-CV-00678, Judge Shea granted Dressler's request to obtain a copy of the videotape deposition of Aviad Hack that was played before the jury during trial. Greer appealed that decision. Said appeal is pending before the Second Circuit.

6. Greer, not unlike many defendants accused of child sexual assault and molestation, has directed his attorneys to threaten and intimidate witnesses and victims who speak out against Greer. Greer's abuse of the legal process is well documented. During the deposition of child molestation victim Aviad Hack in the Federal civil trial of Mirlis v. Greer, Greer "attempted to serve the deponent and the plaintiff with a retaliatory, abusive and entirely meritless state court complaint." See Exhibit C,

Opposition to Motion To Quash Deposition and Production Request and Motion to Compel Deposition of Defendant Daniel Greer, at page 4. Greer never returned said "meritless state court complaint" to the Superior Court. See Exhibit D, copy of Greer complaint. During Aviad Hack's deposition Greer's attorney Ward "spent much of his cross-examination asking irrelevant, invasive, and threatening questions." See Exhibit C, page 4. Attorney Ward asked Aviad Hack whether Aviad Hack had sex with Aviad's sister Rina Greer, who is married to Greer's son. See Exhibit E, transcript of Aviad Hack deposition.

7. "In a civil proceeding, a court has the discretion to sequester any witness, including a party, if (1) seasonably requested, (2) specific and supported by sound reasons, and (3) false corroboration would probably result. Although sequestration is requested more frequently in criminal trials, there should be no distinction in its application between civil and criminal cases. See 6 J. Wigmore, Evidence (6th Ed.1976) § 1839, p. 470. Cirinna v. Kosciuszkiewicz, 57 A. 3d 837, 845-846 (2012). In Cirinna the Appellate Court upheld the trial court's denial of the defendant's sequestration request where the "defendant did not demonstrate a 'good faith reason' that false testimony was likely," and that "any such tailoring could be addressed through cross-examination of the plaintiff's witnesses." Id.

8. Greer has no intention of calling Dressler to the witness stand as part of his defense. If Greer thought that Dressler would assist in his defense Greer would have called Dressler as a witness in his Federal civil child molestation trial, which involves substantially the same set of facts. Greer has far more to lose in his criminal trial than in his civil trial. Instead, Greer tried to completely exclude Dressler from the

civil trial by having his attorneys submit an unsigned restraining order to Judge Shea. This Court must consider the "First Amendment interests of the public and the press in full access to all aspects of criminal proceedings." State v. Ross, 208 Conn. 156, 159 (1988) citing Press-Enterprise Co. v. Superior Court of California, 478 U.S. 1, 106 S. Ct. 2735, 2743, 92 L. Ed. 2d 1 (1986); Press-Enterprise Co. v. Superior Court of California, 464 U.S. 501, 508-11, 104 S. Ct. 819, 78 L. Ed. 2d 629 (1984); Richmond Newspapers, Inc. v. Virginia, 448 U.S. 555, 575-81, 100 S. Ct. 2814, 65 L. Ed. 2d 973 (1980); Branzburg v. Hayes, 408 U.S. 665, 681-83, 92 S. Ct. 2646, 33 L. Ed. 2d 626 (1972).

Wherefore, Dressler requests that he be permitted to attend all criminal court proceedings in this matter.

LAWRENCE DRESSLER

BY _____

Lawrence Dressler
516 Ellsworth Avenue
New Haven, CT 06511
2037108137

CERTIFICATION: I hereby certify that a copy of the foregoing has been hand delivered on this 15th day of August, 2019 to

Office of the State's Attorney
235 Church Street
New Haven, CT 06511

Attorney William Dow
350 Orange Street
New Haven, CT 06511

Lawrence Dressler

EXHIBIT A

ORDER FOR AND NOTICE OF COURT HEARING
RETURN OF SERVICE CIVIL PROTECTION ORDER
JD-CV-145 Rev. 10-16
C.G.S. §§ 6-32, 46b-16a

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

Instructions To Clerk
Assign a hearing date not later than 14 days from the date of this Order for and Notice of Court Hearing.

Note: This *Order For and Notice of Court Hearing* schedules your court hearing for the *Application for Civil Protection Order* (form JD-CL-143) and is NOT the Civil Protection Order. If there is a Civil Protection Order currently in effect, you will also be given an *Order of Protection* (form JD-CL-99) and, if applicable, *Additional Civil Protection Orders* (form JD-CL-131). This *Order For and Notice of Court Hearing* remains in effect even if other orders are issued after this order.

ADA NOTICE
The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

Name of applicant *(Person seeking relief from abuse)*	Name of respondent *(Person application is filed against)*	
Greer, Daniel	Dressler, Lawrence	
Name of next friend *(if applicant is a minor)*	**Judicial district of**	**Docket number**
	New Haven J.D.	NNH-CV17-4070628-S

Order For and Notice of Court Hearing

An *Application For Civil Protection Order* has been presented to the court. It is ordered that a hearing be held on the Application at the Court Location shown below. The applicant must have notice of the Date and Time of the Hearing and a true and attested copy of the *Application*, *Affidavit(s)* and any court orders issued on the ex parte application served on the respondent **not less than five (5) days before the Date of Hearing.**

Hearing date	Time of hearing	Court location *(Number, street, town, zip code and courtroom, if applicable)*
05/22/2017	11:00 a .m.	235 Church St, New Haven, CT, 06510 5D

Any ex parte order shall remain in effect until the hearing is held. If a postponement of a scheduled hearing is asked for, an ex parte order may only be extended by agreement of the parties or by order of the court for good cause shown.

To Any Proper Officer:
By authority of the State of Connecticut you are hereby commanded to serve a true and attested copy of the *Application for Civil Protection Order*, *Affidavit*, and of this *Order and Notice* upon the respondent according to law **not less than five (5) days before the Hearing Date shown above.** The cost of such service upon the respondent shall be paid for by the Judicial Branch of the State of Connecticut in accordance with sections 6-32, 46b-16a and 52-261(a) of the Connecticut General Statutes.

By Order of the Court	Signed *(Assistant Clerk)*	Date signed
	(Abrams, J.)	5/9/17

Return Of Service

To Officer Executing Service:
Type or print legibly in the spaces below, then promptly return this and all accompanying papers to the clerk of the court at the court location above before the date of the hearing.

☐ Service executed

Date of service	Time of service	☐ a.m. ☐ p.m.

☐ By leaving in the hands of or upon the respondent named above.

☐ Other *(Specify in detail and attach additional documentation as needed)*

Brian Mezick
A TRUE COPY, ATTEST
BRIAN MEZICK-CT STATE MARSHAL

☐ Unable to serve *(Comments)*

Name of officer *(Last, first)*	Agency or office	Officer's telephone
Signature of officer		**Date signed**
Under penalty of false statement		

To any proper officer: Electronically record that service of process was executed in the Judicial Branch's service tracking system. If you are unable to electronically record that service of process was or was not executed in the Judicial Branch's service tracking system, complete the return of service section above and send a copy to the Court Operations Unit by e-mail at justice.support@jud.ct.gov or fax at 860-610-0480, and return the original papers to the clerk of the court.

APPLICATION FOR CIVIL PROTECTION ORDER
JD-CV-143 Rev. 10-16
C.G.S. §§ 8-32, 29-28, 29-32, 29-33, 29-36l, 29-36k 46b-15, 46b-16a, 46b-38a, 51-5c, 53a-107, 53a-223

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

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Instructions To Person Filing Application (Applicant):
1. Fill out on-line, or print clearly in ink, or use a typewriter. You must also fill out an Affidavit - Civil Protection Order (form JD-CV-144). Give both forms to the Clerk of Court.
2. If the applicant is under 18 years of age, the Application must be signed and filed by an adult representative, also known as a "next friend". The next friend may be a parent, guardian or other responsible adult. The attached Affidavit (form JD-CV-144) must be completed by the applicant even if they are under 18 years of age and represented by a next friend.
3. After your Application and Affidavit are processed, the clerk will give you the proper papers to have served on (delivered to) the respondent (person the application is filed against).
4. Make sure the originals are returned to court after they are served on the respondent.

Instructions To Clerk:
1. If Ex Parte relief is ordered, prepare the following forms: Order of Protection (form JD-CL-99); Additional Civil Protection Orders (form JD-CL-131) (if applicable); Order for and Notice of Court Hearing, Return of Service - Civil Protection Order (form JD-CV-145); General Notifications - Civil Protection Order (form JD-CL-129).
2. If the Court orders a hearing, prepare an Order for Notice of Court Hearing, Return of Service - Civil Protection Order (form JD-CV-145).
3. Provide the applicant with the original and three copies of the Application and Affidavit and three copies of any completed order form identified in instruction 1.
4. Retain copies of each for the court file.

Judicial District of	Court location (number, street, town, zip code)	Docket number
New Haven	235 Church Street, New Haven, Connecticut 06510	CV17-4070628

Name of applicant (Last, first, middle initial)	Date of birth (mm/dd/yyyy)	Sex (M/F)	Race
Greer, Daniel	06/15/1940	M	N/A

Address to which mail is to be sent (Number, street)* (See NOTE below)	(Town)	(State)	(Zip Code)
133 West Park Avenue	New Haven	CT	06511
Home/residence address* (See NOTE below) ☒ Same as mailing address	(Town)	(State)	(Zip Code)
Work address* (See NOTE below)	(Town)	(State)	(Zip Code)
376 Whalley Avenue	New Haven	CT	06511

Name of next friend (Last, first, middle initial) (if applicant is a minor)	Next friend address (town, state, Zip)* (See NOTE below)

***NOTE: All addresses provided in this application will be included on papers that are in the court file and will be provided to the respondent. The applicant's address or addresses will determine which law enforcement agencies are notified if a Civil Protection Order is granted.**

Information About The Respondent (Person the application is filed against)

Name of respondent (Last, first, middle initial)	Date of birth (mm/dd/yyyy)	Sex (M/F)	Race
Dressler, Lawrence		M	N/A

Address of respondent (Number, street)	(Town)	(State)	(Zip Code)
516 Ellsworth Avenue	New Haven	CT	06511

Respondent's telephone number	Other identifiers (Examples include height, weight and approximate age)
Unknown	Height 5'7"; Weight Approximately 150 lbs., 50 years old

Do you know the respondent?	If yes, how do you know the Respondent:
☒ Yes ☐ No	Prior to the respondent's imprisonment, he attended services at the Yeshiva of New Haven

A TRUE COPY, ATTEST
CONNECTICUT STATE MARSHAL

Judicial District of New Haven
SUPERIOR COURT
FILED
MAY 19 2017
CHIEF CLERK'S OFFICE

Is the respondent a member of your family or household? ☐ Yes ☒ No

A member of your family or household is defined as:
- Your spouse or a person you have a civil union with
- Your former spouse or a person you had a civil union with
- The parent of your child
- Your parent
- Your child
- Someone you have cohabited with as an intimate partner (romantic, spousal, or sexual relationship while living together)
- A person related to you by blood or marriage
- A person you reside or resided with
- A person you have (or recently had) a dating relationship with

NOTE: If the respondent in your case is a family or household member, you DO NOT qualify for a Civil Protection Order and you should NOT continue to fill out this form. However, if the respondent is a family or household member you may qualify for an Order of Relief from Abuse under section 46b-15 of the Connecticut General Statutes. For more information, see Civil Protection Order Information Form (form JD-CV-148), and Restraining Orders: How to Apply for Relief from Abuse (form JDP-FM-142).

☐ "X" here if a Criminal Protective Order or Family Restraining Order exists affecting any party to this Application. (Enter docket number and court location)

Docket number	Court location

Name of applicant	Name of respondent	Docket number
Greer, Daniel	Dressler, Lawrence	17-4070628

Application For Civil Protection Order

☐ 1. I have been the victim of one or more of the following by the respondent named above as explained more fully in my attached Affidavit: *("X" all that apply)*

- ☐ Sexual Abuse
- ☐ Sexual Assault
- ☒ Stalking (as defined in sections 53a-181c, 53a181d, 53a-181e of the Connecticut General Statutes)

☒ 2. I have not obtained any other court order because of such sexual abuse, sexual assault or stalking.

☒ 3. The respondent is not a member of my family or household as defined in the *Instructions* and *Information About the Respondent* sections of this form. See sections 46b-15 and 46b-38 of the Connecticut General Statutes or the *Civil Protection Order Information Form (form JD-CV-148)* for more information.

☐ 4. I request that the court order the following conditions: *("X" all that apply)*

CT01 ☒ The respondent not assault, threaten, abuse, harass, follow, interfere with, or stalk me. (CT01)

CT03 ☒ The respondent stay away from my home or wherever I shall reside. (CT03)

CT05 ☒ The respondent not contact me in any manner, including by written, electronic or telephone contact, and not contact my home, workplace or others with whom the contact would be likely to cause annoyance or alarm to me. (CT05)

CT16 ☒ The respondent stay 100 yards away from me. (CT16)

☒ 5. I request that the court order the following other conditions:

I request that the respondent stay 100 yards away from the United State's District Court for the District of Connecticut at 450 Main Street, Hartford, Connecticut from May 10, 2017 until May 18, 2017 during a trial involving the applicant.

☐ 6. I am in school and I request that a copy of the Civil Protection Order, if it is granted, be sent to my school

Name of school	Fax number of school	
Address of school *(Number, street)*	*(Town)*	*(State)* *(Zip code)*

Request For Ex Parte (Immediate) Relief ("X" if this applies)

☒ 7. I request that the court order Ex Parte (immediate) relief because I believe I am in imminent danger.

Signed *(Applicant or next friend if applicant is a minor)*	Subscribed and sworn to before me:	Signed *(Clerk, Notary, Commissioner of Superior Court)*	Date signed
▶ Daniel Greer	5/8/17		5-8-17

Optional to applicant *(If you choose to answer, "X" the appropriate boxes below)*

1. Does the respondent hold a permit to carry a pistol or revolver?	☐ Yes	☐ No	☒ Unknown
2. Does the respondent hold an eligibility certificate for a pistol or revolver, a long gun eligibility certificate, or an ammunition certificate?	☐ Yes	☐ No	☒ Unknown
3. Does the respondent possess one or more firearms?	☐ Yes	☐ No	☒ Unknown
4. Does the respondent possess ammunition?	☐ Yes	☐ No	☒ Unknown

If you think you need more security when you are in court for your Civil Protection Order hearing, contact the Clerk's Office or the Court Service Center in the court where your hearing is scheduled.

A TRUE COPY, ATTEST
BRIAN MEZICK-CT STATE MARSHAL

Order

Having reviewed the application and affidavit, the court finds:

☐ The allegations in the affidavit do not meet the requirements of section 46b-16a(a) of the Connecticut General Statutes and the application is ***denied***.

☒ The allegations of the affidavit meet the requirements of section 46b-16a(a) of the Connecticut General Statutes and a ***hearing is scheduled.*** *See Order for and Notice of Court Hearing, Return of Service - Civil Protection Order (form JD-CV-145).*

☐ There are reasonable grounds to believe that an imminent danger exists to the applicant. ***Ex parte relief is ordered and a hearing is scheduled.*** *See Order of Protection (form JD-CL-99), Additional Civil Protection Orders (form JD-CL-131), if applicable, and Order for and Notice of Court Hearing, Return of Service - Civil Protection Order (form JD-CV-145).*

☐ There are reasonable grounds to believe that the respondent engaged in the use, attempted use or threat of physical force. ***The respondent is ordered to surrender or transfer all firearms or ammunition.***

By the Court *(Print or Type Name of Judge)*	On *(Date)*	Signed *(Judge, Clerk)*	Date signed
A Dranginis	5/9/17		5/9/17

AFFIDAVIT - CIVIL PROTECTION ORDER

JD-CV-144 Rev. 10-16
C.G.S. § 46b-16a

STATE OF CONNECTICUT
SUPERIOR COURT
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Instructions to Person Applying for a Civil Protection Order *(Affiant)*

This affidavit must be filled out completely and given to the clerk along with your filled out Application for Civil Protection Order (form JD-CV-143).

1. *Your affidavit must include a statement of the conditions you seek relief from and must be made under oath (you must swear that your statement is true and sign it in front of a court clerk, a notary public, or an attorney who will also sign and date the affidavit). The statement must be true to the best of your knowledge. State if any arrest was made related to the incidents outlined in this statement.*
2. *Even if the applicant is under 18 years of age and represented by a next friend, this Affidavit must be completed by the applicant, not the next friend.*
3. *You must sign and swear to all pages.*

Do not write on the back of this form. If you need additional room, use another Affidavit - Civil Protection Order (form JD-CV-144).

Name of applicant *(Your name)*	Name of respondent *(Person you want a restraining order against)*
Daniel Greer	Lawrence Dressler
Name of next friend *(If applicant is a minor)*	Docket number *(For court use only)*
	17-4070628

Statement Of Conditions From Which You Seek Relief

I, the person signing below, say under oath that I am the applicant for this Civil Protection Order and state I have been the victim of sexual abuse, sexual assault or stalking (as described in sections 53a-181c, 53a-181d and 53a-181e of the Connecticut General Statutes) by the respondent as follows: ***(Explain for each incident: (1) what happened, (2) when it happened, (3) where it happened, and (4) who was there when it happened.)***

The respondent, Lawrence Dressler, has continued to harass and stalk me pursuant to Connecticut General Statutes 53a-181c et seq for more than one year and continues to stalk to this date in that:

1. Mr. Dressler has followed and lied in wait for me outside my home, my office, my grocery store, my neighborhood and my synagogue on several occasions. He has acted wilfully and repeatedly in that he has stalked me on nearly daily basis. He has taken photographs, followed me in my neighborhood, written extensively about a civil case in which I am involved. He continues to harass me despite filing a civil lawsuit against him.

2. As a result of Mr. Dressler's actions, I fear for my physical safety. Specifically, Mr. Dressler's actions have a predatory feel to them. His actions have been uninterrupted, over a substantial period of time. In fact, on one occasion, Mr. Dressler's actions resulted in a physical confrontation at my synagogue. His abnormal obsession with me has caused me a great deal of concern for my own safety at this time.

3. My civil trial will begin on May 10, 2017 in the United State's District Court: 450 Main Street, Hartford, Connecticut. I suspect that he will lie in wait for me at that address and I fear for my physical safety based on his earlier actions and writings. I respectfully ask the court for this civil protection order againt Mr. Dressler.

Brian Mezick
A TRUE COPY, ATTEST
BRIAN MEZICK CT STATE MARSHAL

Notice ▶ **Any false statement made by you under oath which you do not believe to be true and which is intended to mislead a public servant in the performance of his or her official function may be punishable by a fine and/or imprisonment.**

I certify that the statements above are true to the best of my knowledge and belief.	Signature of applicant	Print name of person signing
	Daniel Greer	Daniel Greer

Subscribed and sworn to before me *(Assistant Clerk, Commissioner of Superior Court, Notary Public)*
affirmed

Date signed: 5-8-17

CIVIL PROTECTION ORDER INFORMATION FORM
JD-CV-148 Rev. 10-16

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STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

INFORMATION ABOUT CIVIL PROTECTION ORDERS

Note:
The person who seeks protection on the *Application for Civil Protection Order* (form JD-CV-143), is called the "applicant" in the protection order process. The person that the *Application* is filed against is called the "respondent."

How do I know if I qualify for a Civil Protection Order? Answering the questions below will help you decide:

1. Have you been the victim of sexual abuse, sexual assault or stalking?
   - [X] Yes ("X" all that apply)
     - [ ] Sexual Abuse
     - [ ] Sexual Assault
     - [X] Stalking (as defined in sections 53a-181c, 53a181d, 53a-181e of the Connecticut General Statutes) See *Civil Protection Order Stalking Checklist* (form JD-CV-155) for more information.
   - [ ] No

Important:
If you checked "No" to question #1 above, you DO NOT qualify for a Civil Protection Order, but you may qualify for a family restraining order. For information on family restraining orders see, *Restraining Orders: How to Apply for Relief From Abuse* (form JDP-FM-142).

2. Do you already have a court order of protection arising out of such abuse, assault or stalking?
   - [ ] Yes — Court location: ____ Docket number: ____
   - [X] No

3. Is the person who victimized you a member of your family or household?
   - [ ] Yes, because the person who victimized me is: *("X" all that apply)*
     - [ ] My spouse or a person with whom I have a civil union
     - [ ] My former spouse or a person with whom I had a civil union
     - [ ] The parent of my child
     - [ ] My parent
     - [ ] My child
     - [ ] Someone I cohabited with as an intimate partner (romantic, spousal, or sexual relationship while living together)
     - [ ] A person related to me by blood or marriage
     - [ ] A person I reside with or have resided with (Reside means sharing a dwelling)
     - [ ] A person I am dating or have recently had a dating relationship with
   - [X] No, because none of the relationships listed above apply.

Important:
If you checked "Yes" to question #1 and "No" to question #2 and question #3, you may qualify for a Civil Protection Order. If you checked "Yes" to question #2 or question #3 above, you DO NOT qualify for a Civil Protection Order, but you may qualify for a family restraining order. For information on family restraining orders see, *Restraining Orders: How to Apply for Relief From Abuse* (form JDP-FM-142).

How do I get a Civil Protection Order?

Application Procedures
To apply for a civil protection order, complete the following forms:
- *Application for Civil Protection Order* (form JD-CV-143)
- *Affidavit - Civil Protection Order* (form JD-CV-144)

Brian Mezick
A TRUE COPY ATTEST
BRIAN MEZICK-CT STATE MARSHAL

Your affidavit must include an explanation of:
- what happened,
- when it happened,
- where it happened, and
- who was there when it happened.

You can get these forms at any Superior Court Clerk's Office, Court Service Center, or at www.jud.ct.gov.

You must sign the forms in front of a clerk, notary public or lawyer. After signing the forms, file them with (give them to) a Clerk of the Superior Court.

Important: If the applicant is under 18 years of age, the *Application* must be signed and filed by an adult representative, also known as a next friend. The next friend may be a parent, guardian or other responsible adult. The *Affidavit* must be completed and signed by the applicant, even if they are under 18 years of age. The next friend may not speak in court on behalf of the applicant, but may testify as a witness.

EXHIBIT B

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

ELIYAHU MIRLIS,
Plaintiff,

vs.

RABBI DANIEL GREER and
YESHIVA OF NEW HAVEN, INC.,
Defendants.

3:16CV678(MPS)

May 11, 2017

Volume I

450 Main Street
Hartford, Connecticut

T R I A L B Y J U R Y

B E F O R E:
THE HONORABLE MICHAEL P. SHEA, U.S.D.J.

A P P E A R A N C E S:

For the Plaintiff : ANTONIO PONVERT, III, ESQUIRE
Koskoff, Koskoff & Bieder, P.C.
350 Fairfield Ave., 5th Floor
Bridgeport, CT 06604

For the Defendants: DAVID T. GRUDBERG, ESQUIRE
AMANDA C. NUGENT, ESQUIRE
Carmody, Torrance, Sandak & Hennessey, LLP
195 Church Street, 18th Floor
New Haven, CT 06510

WILLIAM J. WARD, ESQUIRE
336 Torrington Road
Litchfield, CT 06790

Court Reporter: Martha C. Marshall, RMR, CRR

Proceedings recorded by mechanical stenography, transcript produced by computer.

I've seen Mr. Ponvert do his openings and closings. He'll want to be as close to the jury as I allow him to get, whis is fine. You have that right. That's fine.

MR. PONVERT: Thank you.

MR. GRUDBERG: A couple of other preliminary issues to raise.

MS. NUGENT: Your Honor, there's another security issue. There's an individual by the name Lawrence Dressler who has been stalking Mr. Greer. He was in the courtroom yesterday. Last night he was served with a restraining order that requires him to be a hundred yards from the building. I have not seen him in the building today, but we're just a bit concerned that he may attempt to enter the courtroom during the proceedings. We wanted the Court to be aware of that. And we're not sure of the best way to ensure that the proceedings aren't disrupted by this gentleman.

THE COURT: Was this the fellow who was sitting over on the left yesterday?

MS. NUGENT: Yes, with the tinted glasses on.

THE COURT: I saw some consternation when he came into the room.

I guess I'm a little puzzled. Obviously, I'm not the one who issued the protective order. I'm not the court that issued that order. So technically it's not up to me to enforce the order. On the other hand, if there's an order

from a court I want to be respectful to that. This is, as you know, a public courtroom.

MS. NUGENT: I understand that.

THE COURT: I'll have to think about this. If he comes into the courtroom and sits in the back quietly, I'm not inclined to take action. I think we better handle this as it comes. Maybe if I could have a copy of the order.

MS. NUGENT: Absolutely. I have a copy here, Your Honor.

MR. WARD: Permission to approach, Your Honor?

THE COURT: Sure.

(Hands.)

THE COURT: Abrams J is Judge Abrams?

MS. NUGENT: Judge Abrams, yes.

THE COURT: And this was served?

MS. NUGENT: It was served, Your Honor, last night.

THE COURT: Is there proof of service here?

MS. NUGENT: I apologize. I have the Marshal's return in my email, but I haven't had access to a printer to print it. If I can have the Clerk's Office print it, we'd be happy to pay whatever printing charges that are associated with that.

THE COURT: Why don't you email it to Mr. Howard.

MR. WARD: Your Honor, for the record, Mr. Dressler just walked in.

THE COURT: Excuse me, sir?

MR. PONVERT: He's my guy.

THE COURT: Oh, it's the fellow in the back. Is there an application to the Court of some type?

MR. WARD: I'm sorry, Your Honor.

THE COURT: Is there an application to the Court?

MR. WARD: To the Court regarding Mr. Dressler?

THE COURT: Yes.

MR. WARD: Yes. We would like him removed, to stay a hundred yards away pursuant to the order. In fact, last evening I believe he chased Mr. Greer down the street after he left court shouting. If that continues, it will be in earshot of some of the jurors perhaps. There has been at least one physical confrontation in the past and it's been going on for quite some time.

THE COURT: Sir, I have been handed a Superior Court order signed by Judge Abrams. Counsel's represented to me that it was served on you. You can stay there, sir. And it says that, as I read it, it says that you're to stay a hundred yards away from the United States District Court for the District of Connecticut, 450 Main Street, Hartford, Connecticut from May 10, 2017 until May 18, 2017, during a trial involving the applicant. The applicant is Daniel Greer.

MR. DRESSLER: Your Honor, the order was not

granted. It wasn't signed by the Judge. A hearing -- there's a hearing scheduled for May 22nd with regard to that request. It wasn't granted.

MR. WARD: Your Honor, there was a --

THE COURT: Wait a minute. Can I review it, please.

Mr. Ward, he appears to be correct.

MR. WARD: Your Honor, with respect, we requested an ex parte relief.

THE COURT: I know. But the box that was checked IS the allegations of the affidavit meet the requirements of Section 46B16A, subsection (a) of the Connecticut General Statutes, and a hearing is scheduled. There's a different box that says that they're reasonable grounds to believe that an imminent danger exists, ex parte relief is offered and the hearing is scheduled. That box was not checked.

MR. WARD: By the Judge?

THE COURT: Correct.

MR. WARD: I had not seen the order.

THE COURT: Next time read it more carefully. Take it back, please.

Sir, please have a seat.

MR. WARD: I apologize, Your Honor. I just got it this morning.

MR. GRUDBERG: Your Honor, one final housekeeping issue. I know the Court's break schedule is fairly spartan.

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ELIYAHU MIRLIS,	:	CIVIL ACTION NO.
	:	3:16-CV-00678-MPS
Plaintiff,	:	
V.	:	
	:	
RABBI DANIEL GREER, YESHIVA OF NEW HAVEN, INC., THE GAN SCHOOL, INC., F.O.H., INC., EDGEWOOD VILLAGE, INC., and EDGEWOOD ELM VILLAGE, INC.,	:	
	:	
Defendants.	:	SEPTEMBER 14, 2016

OPPOSITION TO MOTION TO QUASH DEPOSITION AND PRODUCTION REQUEST AND

MOTION TO COMPEL DEPOSITION OF DEFENDANT DANIEL GREER

FACTS

The Amended Complaint alleges that for a period of years defendant Rabbi Daniel Greer sexually molested, exploited and abused the plaintiff when the plaintiff was a child in the rabbi's care and custody. The allegations are corroborated by another victim of the rabbi's child sexual abuse who testified at deposition that Greer also molested him over a period of years. The defendants filed an Answer on May 25. Since that time, Greer has done everything possible to avoid, evade and prevent the plaintiff's investigation and discovery, beginning with his July 14 request to postpone the deposition of a key witness (Denied, Doc. 20), and culminating with his September 6 Motion to Quash Deposition (Doc. 26). That Motion succeeded in cancelling Greer's deposition by default because Greer's attorney, William Ward, filed it one day before the scheduled date, leaving the plaintiff no time to oppose and the Court no time to rule.

A June 29, 2016 Notice of Deposition originally scheduled Greer's deposition for August 3 at plaintiff's counsel's office in Bridgeport. *See* Affidavit of Antonio Ponvert III in Support of Motion to Compel, filed herewith, Exh. A. At Attorney Ward's request, the deposition was postponed to August 31 and its location moved to Ward's office in Litchfield. *See* July 20 and 21 emails, and July 27 Notice of Deposition, Ponvert Aff. Exh. B. Two days before the rescheduled deposition and just seven days after the deposition was rescheduled to the date requested by Attorney Ward, Greer again sought to postpone it, claiming that he had an unavoidable medical procedure on the noticed date. As later admitted, the medical appointment was scheduled "after the initial notice of his deposition for August 31". *See* Ward's August 29 email, Ponvert Aff. Exh. C. And, despite a request for same, Greer provided no evidence that the appointment was not routine and could not be easily moved. *See* Ponvert Aff. Exh. C. Despite Greer's failure to provide such proof, plaintiff's counsel agreed again to postpone the deposition, this time to Ward's requested date of September 8. Exh. C; and August 29 Notice of Deposition, Ponvert Aff. Exh. D. Because plaintiff's counsel was concerned that Greer would cancel the deposition at the last minute or simply not show up, a subpoena was prepared and sent to the marshal on August 16 and, after Greer evaded service of process for nearly two weeks, served on him on August 29. *See* Subpeona, Ponvert Aff. Exh. E. Plaintiff's concern was valid; less than 48 hours before the thrice-postponed deposition, Greer filed a Motion to Quash (Doc.26), Ponvert Aff. Exh. I.

After Greer filed his September 6 Motion to Quash the again-just-agreed-upon deposition, plaintiff's counsel wrote to the Court, explaining that the late-filed motion

allowed no time for a response and asking for a telephone conference. Ponvert September 6 email, Ponvert Aff. Exh. F. In response, Attorney Ward wrote to the Court:

> "After those emails were written [wherein Ward requested and agreed to the September 8 date, Exh. C] my client provided me with the notice of deposition and production request he was served with on August 29, 2016. Upon receipt, the unduly burdensome production request would not be available buy [sic] September 7, 2016, resulting in my motion. It would not be fair to start the deposition and allow the plaintiff a second day because of a production request erved [sic] 10 days prior to the deposition."

Ward September 7 email to Drew Hillier, Ponvert Aff. Exh. G. This email is inaccurate and misleading. Ward implies that the first time he learned of the document request was when his client shared it with him on August 29. He implies the same in his September 9 email to the Court. *See* Ponvert Aff. Exh. H (Ponvert requested "voluminous documentation on August 29 for an August 31 deposition."). But, not only was the notice and request served multiple times directly on Attorney Ward (Ponvert Exhs. A, B and D), it contained *the exact same* request for production of documents that was contained in the previous June 29 and July 27 Notices of Deposition. *Id.* Ward and his client knew of the need to produce the documents for two months prior to his Motion to Quash; any claimed surprise or unfairness is fabricated.

Equally false and misleading are the assertions in the defendant's Motion to Quash. For example, Greer asserts that "the document requests were made only 10 days prior to the scheduled [September 8] deposition" (Motion, Ponvert Aff. Exh. I, at 1-2), when, in fact, they were first served on the defendant on June 29. Ponvert Aff. Exh. A. And Greer claims that he needs time to produce the documents because the plaintiff is not willing "to inspect and copy all the relevant documents requested" (Motion at 2-3), when, in fact, no such offer was ever made. Rather, the only discussion about copying

documents was Ward's offer, in the context of the defendants' Initial Disclosures, that plaintiff's counsel go to his office to review and copy "a box of insurance policies" and "a box of [credit card] receipts" that Ward himself had not yet reviewed. Ward's August 18 email, Ponvert Aff., Exh. C. There was no offer to copy any of the other requested documents. And, as plaintiff's counsel stated in response to Ward's suggestion, "[i]t is not my duty or obligation to sift through a lot of documents to figure out what's responsive and what is not; it's your client's." Ponvert August 18 email, Ponvert Aff. Exh. C.

Greer also asks that his deposition be postponed until his cross-examination of third-party deponent Aviad Hack is concluded; but, he offers no cogent reason for granting that request. Moreover, that deposition cannot continue until after the Court has ruled on Greer's Motion to Compel (Doc. 29), Hack's opposition to the motion is not due to be filed until September 30, and even if the Court allows Ward to ask the questions in dispute, there is every reason to believe that Greer would delay the conclusion of Hack's deposition in order to continue to delay his.

ARGUMENT

Greer and his attorney sought to delay and prevent Aviad Hack's deposition because they knew his testimony would be lethal to the defendant's case. Judge Shea denied that motion. Ward then spent much of his cross-examination asking irrelevant, invasive, and threatening questions, and he attempted *at the deposition* to serve the deponent and the plaintiff with a retaliatory, abusive and entirely meritless state court complaint. Ponvert Aff. ¶13. Greer has evaded service of process. He has failed to

produce or even to identify required documents. He has sought repeated postponements of his deposition. He intentionally scheduled a routine medical appointment in order to conflict with the third noticed date. He filed a Motion to Quash the deposition less than 48 hours before it was to take place. He then misrepresented the facts in emails to this Court and in his filed Motion. Greer's and his attorney's conduct is abusive, and it betrays a total lack of respect for this Court and for the judicial process. The Court should put a stop to it.

REQUESTED RELIEF

The plaintiff requests that the Court order defendant Greer to appear at the office of plaintiff's counsel to give deposition testimony and to produce the requested documents[1] at a date to be chosen by counsel for both parties, but no later than seven days from the date of the Court's Order.

RESPECTFULLY SUBMITTED
THE PLAINTIFF

BY s/Antonio Ponvert III
Antonio Ponvert III ct17516
Koskoff, Koskoff & Bieder, P.C.
350 Fairfield Avenue
Bridgeport, CT 06604
Tel: 203-336-4421
Fax: (203)368-3244
aponvert@koskoff.com

[1] Greer does not object to the request for documents, he claims only that there is insufficient time to comply with it. *See, e.g.*, Ward's September 7 email to Drew Hillier Ponvert Aff. Exh. G ("There is not [sic] prejudice to the plaintiff to schedule this deposition in October after the production request has been satisfied."); and Motion to Quash, Ponvert Aff. Exh. I, at 2 ("The defendants are willing to allow the plaintiff to inspect and copy all the relevant documents requested.").

EXHIBIT D

SUMMONS - CIVIL

JD-CV-1 Rev. 4-16
C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259, P.B. §§ 3-1 through 3-21, 8-1, 10-13

See other side for instructions

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

- ☐ "X" if amount, legal interest or property in demand, not including interest and costs is less than $2,500.
- ☒ "X" if amount, legal interest or property in demand, not including interest and costs is $2,500 or more.
- ☐ "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer, BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)	Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
235 Church Street, New Haven, Connecticut 06510	(203) 503-6800	August (Month) 30 (Day), 2016 (Year)

☒ Judicial District ☐ Housing Session ☐ G.A. Number:	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349)	Case type code (See list on page 2)
	New Haven	Major: T Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)	Juris number (To be entered by attorney only)
William J. Ward: 336 Torrington Road, Litchfield, Connecticut 06759	405627

Telephone number (With area code)	Signature of Plaintiff (If self-represented)
(860) 567-2210	

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.	Email address for delivery of papers under Section 10-13 (If agreed to)
☒ Yes ☐ No	billwardlaw@sbcglobal.net

Number of Plaintiffs: 1 | Number of Defendants: 2 | ☐ Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	
First Plaintiff	Name: Greer, Daniel Address: 765 Elm Street, New Haven, Connecticut 06510	P-01
Additional Plaintiff	Name: Address:	P-02
First Defendant	Name: Mirlis, Eliyahu Address: c/o Koskoff, Koskoff, & Bieder, P.C. 350 Fairfield Avenue, Bridgeport, Connecticut 06604	D-01
Additional Defendant	Name: Aviad Hack Address: 789 Elm Street, New Haven, Connecticut 06520	D-02
Additional Defendant	Name: Address:	D-03
Additional Defendant	Name: Address:	D-04

Notice to Each Defendant

1. YOU ARE BEING SUED. This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
2. To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
3. If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
4. If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
5. If you have questions about the Summons and Complaint, you should talk to an attorney quickly. The Clerk of Court is not allowed to give advice on legal questions.

Signed (Sign and "X" proper box)	☒ Commissioner of the Superior Court ☐ Assistant Clerk	Name of Person Signing at Left	Date signed
		William J. Ward	07/25/2016

If this Summons is signed by a Clerk:
a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts.
b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law.
c. The Clerk is not permitted to give any legal advice in connection with any lawsuit.
d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.

For Court Use Only
File Date

A True Copy Attest:
Patricia J Davis Jr.
State Marshal

I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date	Docket Number

RETURN DATE: AUGUST 30, 2016	: SUPERIOR COURT
DANIEL GREER	:
	: J.D. OF NEW HAVEN
v.	: AT NEW HAVEN
ELIYAHU MIRLIS ; AVIAD HACK; and	: JULY 25, 2016

COMPLAINT

FIRST COUNT: (ABUSE OF PROCESS)

1. At all times mentioned herein, the Plaintiff, Daniel Greer, was a resident of the City of New Haven, Connecticut.

2. At all times mentioned herein, the defendant, Aviad Hack, was a resident of New Haven, Connecticut.

3. At all times mentioned herein, the defendant, Eliyahu Mirlis, was a resident of the State of New Jersey, acting in concert with Aviad Hack.

4. On or about, the week of April 27, 2015, the defendants, with malice and for the specific purpose of using the civil justice system to extort significant assets from the plaintiff, threatened Daniel Greer with allegations of sexual molestation if he refused to transfer said assets to the defendants and/or their agents servants and or employees, more

specifically, the defendants threatened to assert claims of sexual molestation if the plaintiff, Daniel Greer:

a. Failed to resign as President of the Yeshiva of New Haven;

b. Failed to appoint Aviad Hack as Principal of the Yehsiva of New Haven High School.

c. Failed to appoint Aviad Hack as a Permanent Director of the Yeshiva of New Haven, Inc.

d. Failed to resign from the Board of Directors of the Yeshiva of New Haven, Inc.

e. Failed to obtain a power of attorney to act on behalf of the plaintiff's wife for purposes of obtaining exclusive control ver the Yeshiva of New Haven, Inc.

f. Failed to quitclaim any and all interest in the Yeshiva of New Haven, Inc. to another company controlled by the defendant, Aviad Hack.

5. On May 4, 2015, Daniel Greer refused to submit to the attempted extortion by the defendants and refused to sign any of the documents presented to him by the defendants.

6. Shortly after the plaintiff's refusal to submit to the attempted extortion, the defendant, Eliyahu Mirlis, retained an attorney to pursue civil claims of sexual molestation, and through his attorney, filed a civil action for said claims.

7. As a result of the defendant's claim of sexual molestation, the plaintiff has been forced to hire attorneys for his defense, suffered damage to his reputation in the community, and was caused severe emotional distress.

8. The defendants caused, and continue to cause, the aforesaid civil action to be maintained and pressed against the plaintiff, with ongoing injury described above from April of 2015 to the present.

9. In the manner described above, from April of 2015 continuously through the present, the defendants participated in presenting civil claim of sexual molestation against the plaintiff for the purposes of extorting assets from the plaintiff.

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the relationship between Greer and Eliyahu?
A. At that time?
Q. No. When did you tell her or did you tell her at all? Let me rephrase. Did you ever tell her about your awareness of the relationship between Greer and Eliyahu.
A. Yes.
Q. When?
A. At some point during last summer.
Q. When you say last summer, 2015?
A. That's correct. Some point between when the matters started to come out in April or May of 2015, and before November of 2015.
Q. Okay. Do you know Esther Greer?
A. I do.
Q. How do you know her?
A. She's Rabbi Greer's daughter.
Q. Did you ever express an interest in Esther Greer?
MR. PONVERT: Objection.
Q. You can answer.
A. What do you mean by express?
Q. Did you ever have a flirtation with Esther Greer?
A. Did I ever have a flirtation with Esther

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Greer? No.
Q. Did you ever have a sexual relationship with Esther Greer?
A. No.
Q. What is your relationship with Esther Greer?
MR. PONVERT: Objection.
A. Nothing. I wasn't invited to her wedding, nor was I invited when she had a -- her first child, and I was not invited to that event either.
Q. Were you invited to all of the other Greer children's weddings?
A. Yes.
Q. Were you invited to all of the other Greer children's birth of their children?
A. Yes.
Q. So Esther is the only one who never invited you?
A. Correct.
Q. Okay. And you don't know why?
A. I don't.
Q. Okay. Do you know who Batheva Greer is?
A. Yes.
Q. How long have you known Batsheva?
A. Since she was born.

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Q. Okay. And did you ever express a sexual interest in Batsheva Greer?
A. Yes.
Q. When?
A. At some point between September, 2000, and 2003.
Q. So that was three years?
A. At some point during that time. I have no recollection when it was.
Q. Okay.
A. I don't know what you mean by express though. I mean to whom?
Q. I said expressed a sexual interest in her.
A. Expressed to whom?
Q. Well, to whom did you express it?
A. To her father.
Q. What did you say to her father?
A. I would be interested in marrying her.
Q. So you were interested in marrying Daniel Greer's second daughter, Batsheva? That was his third daughter, right?
A. Yes.
Q. And what was his response?
A. He was very happy with the idea.
Q. What was Batsheva's response?

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A. I never said anything to her.
Q. Do you know why that never came to fruition? You obviously didn't marry Batheva?
A. So she wasn't interested, and I never pur -- she was not interested.
Q. Okay. Rina is your sister, right?
A. Yes.
Q. Is she younger or older?
A. Younger.
Q. Did you ever tell anyone you had a sexual relationship with your sister, Rina?
A. No.
MR. ERRANTE: Do you have a good faith basis for that question?
MR. WARD: I do.
MR. ERRANTE: Want to put it on the record? Do you want to put it on the record?
MR. WARD: No. But I do.
MR. PONVERT: Is it something other than what your client told you?
Q. Do you know Eliezer Greer?
A. Yes.
Q. And who is Eliezer Greer?
A. Rabbi Greer's son.
Q. You said you were best friends with Dov