# STATE OF CONNECTICUT GEOGRAPHICAL AREA NO. 19 AT ROCKVILLE

TSR-CV-24-5001864-S

DANIEL GREER

V.

COMMISSIONER OF CORRECTION

MAY 22, 2025

## AFFIDAVIT OF COUNSEL AND CERTIFICATE OF GOOD FAITH

Pursuant to Conn. Prac. Bk. § 1-23, I, Michael W. Brown, hereby state:

- (1) I am over the age of 18 and understand the obligations of an oath.
- (2) I am an attorney licensed to practice in the State of Connecticut.
- (3) I represent the petitioner in the above-captioned matter.
- (4) The facts relied upon to show the grounds of disqualification are such as appear from (A) a review of the publicly available information related to the judicial authority, including the nomination proceedings before the legislature, and (B) a review of the attached judicial branch printout demonstrates that the Connecticut Supreme Court decided several motions and rejected a number of appeals from the petitioner's litigation during the time period that the judicial authority was employed as a permanent clerk at the Court.
- (5) The nature of the appellate court process and the working of the court makes it impossible for the petitioner to assert with certainty the level of the judicial authority's involvement with the petitioner's prior appellate matters, but the judicial authority's presence in the role as a clerk at that time is sufficient to demonstrate an appearance of impropriety.
- (6) This Moton for Recusal is made in good faith and in furtherance of the

petitioner's rights.

(7) I have read the foregoing and believe the statements are true and complete to the best of my knowledge and belief.

Respectfully submitted, DANIEL GREER The Petitioner

By M N

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STATE OF CONNECTICUT COUNTY OF HARTFORD AT WETHERSFIELD

Subscribed and sworn before me this 22nd day of May 2025

Commissioner of the Superior Court
Adele Patterson

#### CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on Thursday, May 22, 2025, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery. Name and address of each party and attorney that copy was or will immediately be mailed or delivered to:

## **Petitioner**

Daniel Greer, #433222 MacDougall Correctional Institution 1153 East Street South Suffield, CT 06078

### Counsel of Record

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Michael W. Brown