COUNTY

INDEX NO. 653668/2016

NYSCEF DOC. NO. 64 RECEIVED NYSCEF: 08/16/2018

County of New York	'K	
Bibliotechnical Athenaeum,)	
Plaintiff,)	
- against -)	Index No. 653668/2016
National Lawyers Guild, Inc., &)	
The National Lawyers Guild)	
Foundation, Inc.)	
Defendants.)	
))	

Notice of Motion

PLEASE TAKE NOTICE that, upon the Affirmation of Benjamin Ryberg and with attachments, and all prior pleadings and proceedings heretofore in this matter, the Plaintiff will move this Court in Room 130 at the Supreme Court, New York County, 60 Centre Street, New York, New York, 10007, at 9:30 A.M. on the 14th day of September, 2018, or as soon thereafter as counsel may be heard, for an order awarding partial summary judgment pursuant to CPLR 3212.

The above entitled action is a discrimination claim under state and local Human Rights Laws.

[continued on next page]

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

INDEX NO. 653668/2016

NYSCEF DOC. NO. 64 RECEIVED NYSCEF: 08/16/2018

Please take notice that any answering affidavits or any notice of cross-motion, with supporting papers, must be served at least 7 days before the above return date pursuant to CPLR 2214.

The Lawfare Project

/s/ Benjamin Ryberg

by:_

Benjamin Ryberg Attorney for Plaintiff 633 Third Avenue 21st Floor New York, NY 10017 Tel. 212-339-6995

Dated: August 16, 2018 New York, NY

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Supreme Court of the State of New Yor County of New York	·k	
Bibliotechnical Athenaeum,)	
Plaintiff,)	V 1 N (52((0)201(
- against -)	Index No. 653668/2016
National Lawyers Guild, Inc., &)	
The National Lawyers Guild Foundation, Inc.)	
Defendants.)	
)	

Affirmation of Benjamin Ryberg in Support of Motion for Partial Summary Judgment

Benjamin Ryberg, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following statement to be true under penalty of perjury:

- 1. I am the attorney for the Plaintiff ("Bibliotechnical") in the above-referenced matter. I respectfully submit this affirmation in support of Bibliotechnical's motion for summary judgment.
- 2. Attached hereto as Exhibit 1 is a copy of an Affidavit of David Abrams, who acted on behalf of the Plaintiff in this matter.
- 3. Attached hereto as Exhibit 2 are copies of the most recent pleadings in this matter.
- 4. Attached hereto as Exhibit 3 is a copy of my memorandum of law.
- 5. Accordingly, I respectfully request that the Court award partial summary judgment against Defendant National Lawyers Guild, Inc. in the form of an injunction as set forth in more detail in my memorandum of law.

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

6. As set forth in more detail in my memorandum of law, if the Court awards the injunction, my client is willing to withdraw any claim for compensatory or punitive damages as well as a claim for liability against the remaining Defendant.

7. Thus, if the Court grants this motion, there would be no issues left to try.

The Lawfare Project

/s/ Benjamin Ryberg

by:_

Benjamin Ryberg Attorney for Plaintiff 633 Third Avenue 21st Floor New York, NY 10017 Tel. 212-339-6995

Dated: August 16, 2018 New York, NY

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit 1

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

NYSCEF DOC. NO. 65

INDEX NO. 653668/2016

RECEIVED NYSCEF: 08/16/2018

County of New York	ork
Bibliotechnical Athenaeum,)
Plaintiff,)
- against -) Index No. 653668/2016
National Lawyers Guild, Inc., & The National Lawyers Guild	3
Foundation, Inc.	Ś
Defendants.	3
	3

Affidavit of David Abrams in Support of Motion for Summary Judgment

State of New York)	
)	SS.:
County of New York)	

- Attached hereto as Exhibit A is a true copy of Defendant National Lawyers Guild, Inc.'s ("NLG's") brochure for its annual convention which was to be held in Manhattan in August of 2016. I downloaded Exhibit A from NLG's website.
- 2. Page 7 of Exhibit A is the registration form. From the registration form, which contains a schedule of prices for members and non-members, it is clear that all aspects of the convention, including the banquet and Dinner Journal, were held completely open to members of the general public and not limited in any way. (Except, of course, when it comes to Israelis.)
- This is confirmed by Exhibit B, the brochure for Dinner Journal ads (also downloaded from NLG's website), which states: "Placing an ad in the journal is a great way to congratulate our outstanding honorees (http://www.nlg.org/convention/2016-nlg-

NYSCEF DOC. NO. 65

INDEX NO. 653668/2016

RECEIVED NYSCEF: 08/16/2018

honorees), recognize this year's keynote speaker, Elle Hearns, publicize your firm or organization, or just share a message of your own—all while supporting the Guild!"

- 4. Attached hereto as Exhibit C is a true copy of an e-mail exchange between myself (on behalf of the Plaintiff in this matter) and an anonymous representative of NLG. Also included in Exhibit C is a copy of the ad I tried to place. (Plaintiff in this matter is an Israeli corporation.)
- 5. As the Court can see, there is and can be no dispute that: (1) I attempted to place an ad in the Dinner Journal on behalf of the Plaintiff in this matter; (2) to that end, I paid NLG \$200 via a credit card; (3) and the ad, which was otherwise not objectionable, was rejected solely due to the national origin and citizenship status of the Plaintiff in this matter.
- 6. Attached hereto as Exhibit D is a copy of the actual Dinner Journal in which my ad would have run had it been accepted. I downloaded it from NLG's website. As the Court can see, the ad I tried to place was typical of those contained in the dinner journal.

David Abrams deposes and says: that he/she is principal of the Plaintiff herein; that he/she has read (or had read to him/her) the foregoing Affidavit and knows the content thereof; that the same is true of his/her own knowledge except as to the matters therein stated on information and belief; and that as to those matters, he/she believes the same to be true.

Subscribed and affirmed under penalty of perjury to before me this

day of Agrit, 20

IRWIN J. BEROWITZ

Notary Public, State of New York
No. 02BE5033479

Qualified in New York County

Commission Expires September 19, 2019

-

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit A



Dozens of social justice oriented CLEs, workshops, panels and events on movement law!

Honoring

Soffiyah Elijah • Albert Woodfox • Michael Deutsch • Audrey Bomse Javier Maldonado • Noelle Hanrahan • Emily Bock • With Keynote Speaker Elle Hearns

Co-Sponsored by

NYU School of Law Public Interest Law Center* | National Lawyers Guild Foundation

*Current NYU Law students and 2016 graduates will receive complimentary convention registration

New York City & the Origins of the Guild

The New York City Chapter is thrilled to welcome you to the 2016 NLG Convention. It has been a long while since the convention was last held in NYC. Through the generous co-sponsorship of the Public Interest Law Center at NYU School of Law, including Dean Trevor Morrison, Assistant Dean for Public Service Lisa Hoyes and Prof. Helen Hershkoff, our conference this year has access to wonderful Greenwich Village classroom meeting facilities and dormitory housing. Our sincere thanks to NYU for partnering with us.

2016 is turning out to be a turning point year for law in our country. Thus, we feel especially privileged to engage allies from social justice organizations in New York and the East Coast in discussions about the future of crucial progressive issues. The Supreme Court is in the balance for the next generation; public figures project a vision which is less fair, less tolerant, and downright racist. Shocking as these times are, this is when the NLG needs to be at its best to defend peoples' rights.

Hard times have often brought out the best in the NLG. From the Guild's early beginnings, when it was formed as a racially and ethnically integrated alternative to the segregated American Bar Association, NLG-NYC members have played an integral role. The organizational meeting proposing the creation of the NLG took place at the City Club in December of 1936. NYC provided the first national NLG President, Frank P. Walsh and now proudly our current President, Natasha Lycia Ora Bannan.

Since then, NLG-NYC members have joined with leaders across the nation in every major program and project of the Guild, initiating national projects that continue today—from Leonard Boudin's leadership in the first Labor Law Committee, to Marty Popper's defense of the Hollywood 10 at the HUAC trials. NYC also gave us Arthur Kinoy, who represented the Chicago 8, Julius and Ethel Rosenberg, and testified before the HUAC. Arthur also co-founded the Center for Constitutional Rights 50 years ago, along with the legendary William Kunstler who answered the call to come to Attica's D-yard to

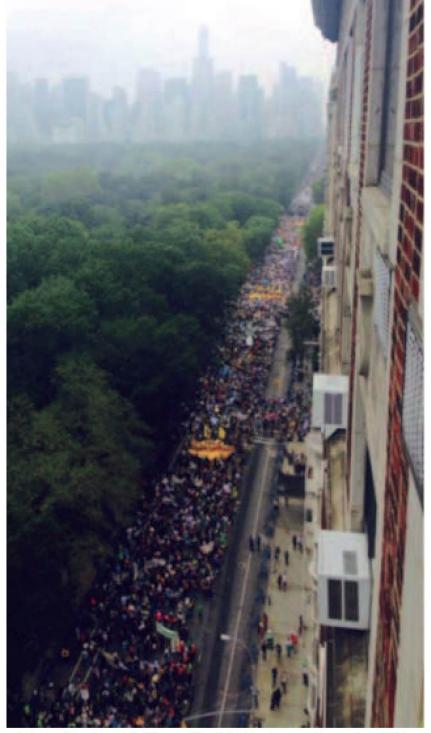
NYC also gave us former NLG President Victor Rabinowitz and his law partner Leonard Boudin, who represented the revolutionary government of Cuba, and their partner Michael Krinsky continues that work today. Michael Krinsky brought *NLG v. Attorney General* to hold the FBI accountable for its COINTELPRO activities.

negotiate for the human rights of the prisoners at the rebellion.

Former NLG President Haywood Burns, who was the coordinator of the defense of the Attica criminal cases, worked with Dr. Martin Luther King, Jr. and defended Angela Davis; Mary Kaufman, who was an observer at the Nuremberg Trials, organized the first Mass Defense Office at the NYC Chapter in 1968, training hundreds of young lawyers who provided legal support and representation for striking Columbia University students, the Black Panthers, the Young Lords, the Weathermen, and countless others.

The Guild's unique strength is each new generation, committing themselves to peoples' movements. In the last year alone, NLG-NYC committees have successfully supported parole seekers in state prisons, hosted numerous CLEs on a range of topics, Legal Observed dozens of mass mobilizations, coordinated legal representation for protestors from the #BlackLivesMatter, immigrants' rights, economic justice, housing, and Occupy Wall Street movements, and provided trainings and networking events to the next generation of legal workers, law students, and attorneys in the movement.

This year, our convention will take place in legendary Greenwich



INDEX NO. 653668/2016

A view of the People's Climate March in Manhattan, September 2014.

Village, one of the most historic areas of the city. "The Village" was a hub of the Underground Railroad, a crucible of the Labor Movement, and an incubator of literature, art and jazz. The Convention will hold its NLG Student Mixer at the Stonewall Inn, birthplace of the modern LGBTQ movement. We also urge visitors to pause in front of two notable NLG historic sites: 23 Cornelia Street, which was the home of the 1970's National Office and NYC Chapter; and 640 Broadway, home of the NY Law Commune, which defended the Black Panthers and helped launch the network of NLG-related law collectives which caught the national imagination.

While here, we also urge you to explore other areas of the city. Culturally significant neighborhoods such as Harlem, the Lower East Side, Fort Greene, Jackson Heights, and others are just minutes away. And if you need advice on where to enjoy the nightlife, just ask a NYC Guild member—we're more than willing to show you around! We hope you enjoy your stay!

> -Carl Lipscombe, President Suan Howard, Executive Director NLG-NYC Chapter

RECEIVED NYSCEF: 08/16/2018

2016 NLG Honorees

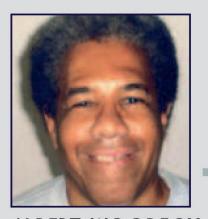
At every NLG #Law4thePeople Convention, we honor members and friends of the Guild whose exemplary work and activism capture the spirit of "law for the people," and speak to the Guild's philosophy of human rights over property interests. Please join us in congratulating our 2016 honorees!



AUDREY BOMSE Debra Evenson Award



SOFFIYAH ELIJAH Law for the People Award



ALBERT WOODFOX Arthur Kinoy Award

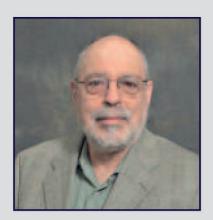


INDEX NO. 653668/2016

JAVIER MALDONADO Carol Weiss King Award



EMILY BOCK C.B. King Award



MICHAEL DEUTSCH Ernie Goodman Award



NOELLE HANRAHAN Legal Worker Award

Pay tribute to the awardees with a message in the 2016 #Law4thePeople Convention Dinner Journal!

Each year, the NLG National Office publishes a keepsake booklet in honor of the NLG awardees. The Dinner Journal is distributed at the Friday Night Banquet and cherished by Guild members for years to come. Placing an ad in the journal is a great way to congratulate our outstanding honorees, recognize this year's keynote speaker, Elle Hearns, publicize your firm or organization, or just share a message of your own—all while supporting the Guild! To learn more about our honorees or to reserve ad space, visit nlg.org/dinnerjournal

A Message from NYU PILC

New York University School of Law's Public Interest Law Center (PILC) is delighted to co-host the Convention and to welcome the NLG back to campus! While much has changed in the world since the last time PILC co-sponsored the Convention in 1993, one thing remains the same: passionate students yearn to address the world's injustices. PILC is honored that the NLG will bring a vibrant conversation about social justice to our students and campus this summer by hosting a "town square" for the legal community to address issues of racial, economic and global justice.

For those who are unfamiliar with PILC, it was one of the first free-standing public interest centers at a U.S. law school. PILC was founded over 40 years ago with the goal of providing substantial institutional support to students inspired by movements for equality. Since that time, PILC has served as a model for other law schools wishing to support students in similar ways, and it has promoted a culture of collaboration among law schools across the nation. PILC is especially proud of its annual Public Interest Legal Career Fair, which it hosted for the 39th time this year, connecting hundreds of employers with students from 21 law schools in the New York region.

NYU Law students, faculty and staff look forward to welcoming the NLG this summer and to exchanging ideas for promoting justice at this critical time.

> -Lisa Hoyes, Assistant Dean for Public Service New York University School of Law

NYSCEF DOC. NO. 65 RECEIVED NYSCEF: 08/16/2018

Tentative Schedule

Convention Registration and most events at NYU School of Law: 40 Washington Square South, NYC 10012				
WEDNESDAY, 8/3	THURSDAY, 8/4	FRIDAY, 8/5	SATURDAY, 8/6	Sunday, 8/7
8:30 AM - 5 PM	8 AM - 5PM	8 AM - 8:55 AM:	8 AM - 8:55 AM	9:30 AM - 10:45 AM
NIPNLG CLE	NIPNLG Membership Meeting	NLG Management Training	NLGF Board Meeting	Workshops III
5 PM - 7 PM	2:30 PM - 5 PM	9 AM - 10:15 AM	9:00 AM - 10:30 AM	11 AM - 12:15 PM
[NEW] Welcome Reception at	NIPNLG Break Out Sessions	Workshops I	Major Panels I	All NLG Regional Meetings
Center for Cuban Studies				
6 PM - 8 PM	9 AM - 5 PM	10:30 AM - 11:45 AM	10:45 AM - 12:45 PM	12:30 PM - 2:30 PM
NPAP Board Meeting	NPAP CLE	Workshops II	Plenary II	NEC Meeting
6 PM - 10 PM	8:30 AM -12 PM	12 PM - 1:30 PM	1:45 PM - 3:15 PM	1 PM - 2:30 PM
NIPNLG Board Meeting	IC Meeting	NLG Union Meeting	Major Panels II	Workshops IV
8:30 PM - 9:30 PM	1 PM - 4 PM	2 PM - 3:15 PM	3:30 PM - 6:30 PM	2:30 PM
NEC Meeting	MLTF Meeting	Legal Worker & Student Caucus	ARC Programming	(Bus Tour) Land Use & Gentrification
		Meetings		in NYC's Lower East Side
	1 PM - 5 PM	3:30 PM - 5:30 PM	3:30 PM - 6:30 PM	3 PM
	IC CLE	Plenary I	TUPOCC Programming	(Walking Tour) Queer Village 1960s
				Walking Tour with Jay Toole
	5 PM - 6:45 PM	5:45 PM - 7:15 PM		
	NIPNLG Reception & Daniel Levy	IC/L&EC Reception: Debra		
	Award	Evenson Award		
	6 PM - 7 PM	6:30 PM - 7:30 PM	ABBREVIATIONS	S: ARC=Anti-Racism Committee,
	Pre-Keynote Reception	Pre-Banquet Reception	IC=International Cor	nmittee, L&EC=Labor & Employment
	7 PM - 8:45 PM	7:30 PM - 10 PM		LG=National Immigration Project,
	Keynote Address, Carol Weiss	Annual Banquet: Law for the		l Police Accountability Project, tive Committee, MLTF=Military Law
	King & Arthur Kinoy Awards	People, Ernie Goodman, Legal		=The United People of Color Caucus
		Worker & CB King Awards		'
	9:00 PM - Late	-	NOTE: <u>Schedule is n</u>	ot exhaustive and is subject to change.
	Inter-Gen Student Mixer at		for	ill be added. Visit nlg.org/convention schedule updates.
	Stonewall Inn		101	The agree aparties.

Workshops

WORKSHOPS I

- Felon Disenfranchisement: The Black Eye of Democracy
- The Next Episode: Making Marijuana a Movement for Black and Brown People
- Recognizing the Pattern: Criminalization of Dissent Across Movements
- Inside Out: NLG Support for People in Prison & How to Start A Project
- War on the Homeless: On the Cutting Edge of a Movement to Abolish Poverty
- Haiti's Fight for Democracy: A Critical Time For Solidarity
- Responding to Over-policing & Militarization at the Border
- Katrina to Ayotzinapa: People's Tribunals Condemn Crimes Against the People

WORKSHOPS II

- A Right to Counsel in Housing Proceedings: Should Housing Justice Movements Push for Civil Gideon?
- The People's Lawyer: The Radical Legacy of Michael Ratner
- 21st Century Red Squad: The NYPD's Muslim Surveillance Program
- Connections: The Draft, the Poverty Draft, Veterans and U.S. Imperialism
- Labor Migration in the Americas: Structural Causes and Exploitation
- Building a Sustainable & Progressive Practice
- Resistance to Immigration Detention

WORKSHOPS III

- Urgency of Cuba & Venezuela for Anti-Racist & Gender Liberation Movements
- De-Commodify our Homes!
 Fighting Displacement with Community Land Trusts
- Supporting Incarcerated Transgender and Gender Non-Conforming People
- Prosecuting Palestine:
 Strategies for the Fight Against Racism & Empire
- There are Still Political Prisoners in U.S. Prisons!

WORKSHOPS IV

INDEX NO. 653668/2016

- Digital Security for Organizers & Movement Lawyers
- Nuclear & Earth Rights
- (Hot Topic #1) Puerto
 Rico: The Deepening of
 Colonialism in Response to
 an Economic Crisis
- (Hot Topic #2) Solitary Confinement: How to Build a Movement to End the Torture of Solitary Confinement

All workshops are scheduled for Friday , 8/5 and Sunday, 8/7. See Tentative Schedule above. FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

NYSCEF DOC. NO. 65 RECEIVED NYSCEF: 08/16/2018

Major Panels

MAJOR PANELS I

- Abolitionist Legal Work: Strategies for Transforming a Prison Nation
- Making Human Rights More Sacred than Property Interests: Here & Abroad
- Can't Hold Us Down: Solidarity Strategies Beyond the Courtroom

MAJOR PANELS II

- Commemorating the Legacy of the Black Panther Party
- Build the Guild: Partnering for Sustainability
- Flint: A Case Study Future Cities & the Neo Liberal Agenda

All Major Panels are scheduled for Saturday, 8/6. See Tentative Schedule.

INDEX NO. 653668/2016

Full-Day CLEs

Immigration Law (Details TBA)The National Immigration Project of the NLG (NIPNLG) will present this one-day training that will explore immigration trials and techniques and illustrate how to build the record for appeal. (A fee in addition to convention registration will be charged.)Visit nipnlg.org/seminars for more. (Designated on Tentative Schedule as "NIPNLG CLE")

Police Misconduct and Prisoners' Rights Litigation This CLE will explore topics including: gender bias in the legal profession; how to ask the jury for damages; current prison and jail litigation issues; ethical fee agreements, and proving a Monell claim. Speakers will include Elizabeth Alexander, former Director of the National Prison Project of the American Civil Liberties Union Foundation; John Boston, Legal Aid PRP, NY; Gene Iredale, Iredale & Yoo, CA. (A fee in addition to the Convention fee will be charged). Sponsored by NPAP. (Designated to on Tentative Schedule as "NPAP CLE")

Know Your Economic Human Rights The International Committee's CLE program will focus on economic human rights, their scope and application, relevant human rights conventions and treaties, and strategies for applying and using these conventions and rights in active practice. Economic human rights include, but are not limited to, the right to water, the right to housing, the right to social security, the right to food, the right to health. As people are struggling across the US for economic human rights, from Flint to California to Baltimore to New York, learn about how you can include these important arguments and legal rights in your practice to support people and movements. Register online: nlginternational.org. (Referred to on Tentative Schedule as "IC CLE")

Many workshops and panels also have CLE credit pending.

Dorms & Housing

NYU DORMS: Accommodations for conference participants are available for one or more nights from August 2-8, in nearby NYU undergraduate dormitories. A limited number of dormitory spaces are available for those who register and pay by **June 19**. While we may have additional space available past that date, it will be granted on a first come, first served basis. Reserve yours early to secure your spot!

Rooms are suite style, containing two single or double bedrooms, attached to a shared bathroom. You may indicate your preferred roommate and/or suitemate when you register. A housing reservation must be purchased for each person staying in the dorms. One set of bedding and towels are included. NOTE: Dormitory occupancy is limited to persons 18 years of age or older. Smoking and guest access are not permitted. For more info, FAQs or to reserve your dorm, visit **nlg.org/convention**.

NYU Dorm Rates:

- Double Occupancy/Shared Bedroom in Two-Bedroom Suite: \$60/night per person
- Single Occupancy/Private Bedroom in Two-Bedroom Suite: \$88/night per person

MANSFIELD HOTEL: We have secured a bloc of discounted rooms at the unionized Mansfield Hotel, in midtown Manhattan, 12 West 44th Street. The Mansfield is a 25 minute subway or bus trip to Washington Square. Standard guest rooms with 1 Queen bed are \$179/night (plus tax) To book your room, visit www.mansfieldhotel.com and use **Offer Code NLGB** or by calling the Mansfield at at (212) 277-8700, or via email to reservations@mansfieldhotel.com. Reservations must be made by June 15 to obtain the NLG discount rate.

ALTERNATIVE HOUSING: A limited amount of space will be available in the homes of New York Guild members. As we rely on the availability of extra space generously volunteered by our local NLG-NYC members, we cannot guarantee alternative housing to everyone. Please fill out the online forms at the URLs below to either request or offer alternative housing by **July 4**.

Request: <u>bit.ly/HousingRequests</u>2016

Offer: <u>bit.ly/HousingOffers</u>2016

RECEIVED NYSCEF: 08/16/2018

INDEX NO. 653668/2016

Special Events

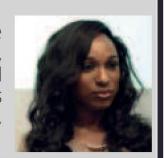


NEW! Welcome Reception at the Center for Cuban Studies

On Wednesday, 5 PM -7 PM, join us for the Guild's Convention welcome reception, hosted by Guild President Natasha Lycia Ora Bannan, the Guild International Committee's Cuba Subcommittee and our friends at the Center for Cuban Studies! We will be in the amazing Cuban Art Space, surrounded by artwork by some of Cuba's most renowned contemporary artists (artwork available for purchase). We will celebrate the resumption of diplomatic relations with Cuba, with invited guests from Cuba, music, empanadas, rum punch and more!

Keynote Address: Elle Hearns; Arthur Kinoy & Carol Weiss King Award Presentations

Hear Elle Hearns deliver the keynote address to officially kick off the NLG 2016 #Law4thePeople Convention! Currently the organizing coordinator fo the #BlackLivesMatter network, Elle is a revolutionary organizer, freedom fighter and strategy expert, as well as a highly noted public speaker, facilitator, trainer and writer. We'll also be honoring former political prisoner and Black Panther Party member Albert Woodfox with the Arthur Kinoy Award and Javier Maldonado will receive the Carol Weiss King Award from the National Immigration Project for his work at the intersection of immigration and criminal law. (No cost, open to all!)





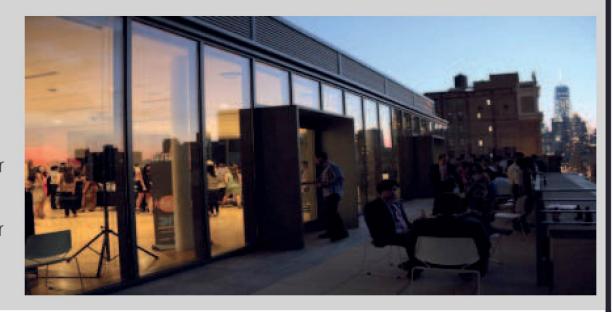
Inter-Gen Student Mixer at Stonewall Inn

Come join Guild students for an inter-generational mixer at the historic Stonewall Inn in Greenwich Village at our annual student party! Just a short walk from the NLG convention site at NYU, and guaranteed to be a great time! The Stonewall riots that took place in June 1969 are considered one of the most important events in the fight for LGBTQ rights in the United States. The NLG is honoring this history with a queer/trans liberation dance party, where we will be celebrating queer elders and trans leaders including Miss Major and Jay Toole! Entry is FREE and all are welcome!

Annual Awards Banquet

What is the annual NLG banquet? Food, drinks, music and laughter; photos and stories about Guild victories; meeting of friends old and new; and recognizing the outstanding work of our members with the Law for the People, Ernie Goodman, Legal Worker, and C.B. King Awards. By evening's end, we leave with renewed solidarity—the nourishment that fuels our work all year long.

We'll be celebrating on the rooftop of the Manny Cantor Center in Manhattan's Lower East Side. The event sells out every year, so don't miss it! (Ticket required, see registration form.)





Walking Tour: Queer Village 1960s Walking Tour with Jay Toole

Come with me as I tell you about the 1960s ... and how the West Village was back then, what it looked like..felt like ... The lesbian bars, Washington Square Park (my bench where I lived for years.) Learn about all kinds of LGBTQ experiences and history details you won't find in the history books. Find out what really happened at night in the Women's House of D (Detention) from someone who spent much time there, learn about why the mafia ran the early gay bars and more!

Bus Tour: Land Use and Gentrification in NYC's Lower East Side

NYC's Lower East Side (re-dubbed the "East Village" in the 1960s), has for more than a century been an incubator of new cultures and more recently, a political battleground as communities hold on against the onslaught of gentrification. Enjoy a brief tour of this amazing neighborhood with Land Use expert and CUNY Law professor Andrea McArdle, activist East Village denizen and former NLG executive director Heidi Boghosian, and LES community organizer and NLG-NYC executive director Susan Howard, for a sampler of the history, struggles and culture spanning this extraordinary community.

NYSCEF DOC. NO. 65

2016 LAW FOR THE PEOPLE CONVENTION - REGISTRATION FORM

Co-sponsored by the NYU School of Law Public Interest Law Center* and the NLG Foundation

*Current NYU Law students and 2016 graduates receive free registration, Visit nlg.org.org/convention to pre-register

	Skinst
	Register Paperwork!
	nig org/com
1	nig org/convention

INDEX NO. 653668/2016

Name:		☐ Attorney ☐ Legal Worker ☐ Law Student ☐ Other		
Address:			State:	žip:
Phone:	9	Email:	11	F1
Gender pronoun:	Accessibility Needs?	200		

	NLG Member Rates		Non-Member Rates	
Early bird rates available through June 30	Early bird	Regular	Early bird*	Regular
Law Students	\$50	\$60	\$65	\$75
Others: Income under \$25,000	\$150	\$180	\$190	\$225
Income \$25,000 - 34,999	\$190	\$200	\$225	\$250
Income \$35,000 - 44,999	\$200	\$225	\$250	\$280
Income \$45,000 - 64,999	\$240	\$265	\$300	\$330
Income \$65,000 - 74,999	\$275	\$300	\$345	\$375
Income \$75,000 - 99,999	\$360	\$380	\$450	\$475
Income \$100,000 - 199,999	\$450	\$460	\$560	\$575
Income \$200,000+	\$500	\$520	\$625	\$650
Attendance at one day only	\$7.	5	\$1	90

PAYMENT AMOUNT:

TOTAL	= \$
Dinner Journal Ad (see <u>nlg.org/dinnerjournal</u> for ad rates and types)	Ad Type (circle): A B C D E F G H = \$
Donation to the NLG	= \$
Donation to subsidize NLG students	= \$
Donation to TUPOCC travel stipend	= \$
Friday Night Banquet (\$75/Students \$35)	x (number) = \$
Membership Dues (if lapsed)	x (number) = \$
Convention Registration*	x(number) = \$

PAYMENT METHOD:

☐ Check enclosed, made pa	yable to "National Lawyers Guild"			
☐ MasterCard ☐ VISA: Ca	rdholder Name:		Card#	
Exp. Date	Billing zip:	Signature X		
Please note billing add	iress if different from above:			

To complete registration (choose one): Pre-registration (by mail and online) closes July 15. On-site registration will be available at the convention.

- by postal mail: send form with check or credit card info to: National Lawyers Guild, 132 Nassau St., Rm. 922, New York, NY 10038
- by email: scan and send this completed form (credit card only) to registration@nlg.org
- online: skip the paperwork and register online (credit card only) at nig.org/convention.

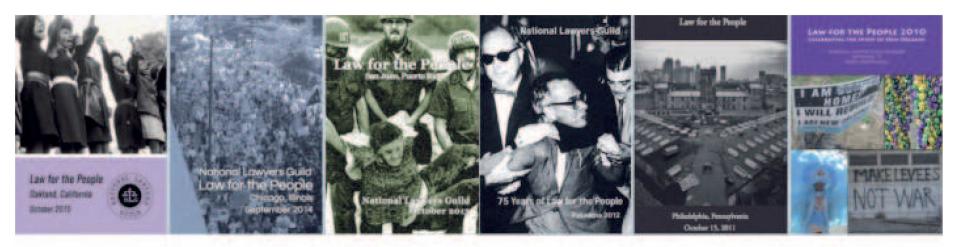
NYSCEF DOC. NO. 65

INDEX NO. 653668/2016 RECEIVED NYSCEF: 08/16/2018

national lawyers guild foundation 132 Nassau Street, Room 922 New York, NY 10038



SHARE A MESSAGE IN THIS YEAR'S DINNER JOURNAL AND SHOW YOUR SUPPORT FOR THE NLG!



WWW.NLG.ORG/DINNERJOURNAL





national lawyers guild foundation

Cover image by Judith Rew

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit B

NYSCEF DOC. NO. 65

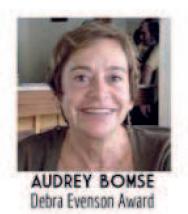


Dinner Journal

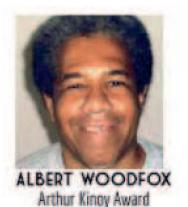
Show Your Solidarity With A Tribute To The 2016 Honorees

NEW DEADLINE: MONDAY, JUNE 27

2016 NATIONAL LAWYERS GUILD HONOREES

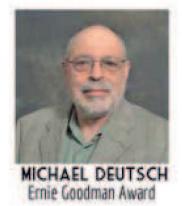


SOFFIYAH ELIJAH Law for the People Award











(https://www.nlg.org/convention/2016-nlg-honorees)

Please join us in congratulating this year's <u>NLG honorees</u> (http://www.nlg.org/convention/2016-nlg-honorees) by placing an ad in the **2016** #Law4thePeople Convention Dinner Journal!

Every year (http://www.nlg.org/dinner-journal-archives), the NLG National Office publishes a keepsake booklet in honor of the NLG awardees. The Dinner Journal is distributed at the Convention's Banquet Dinner and cherished by Guild members for years to come. Placing an ad in the journal is a great way to congratulate our outstanding **honorees** (http://www.nlg.org/convention/2016-nlg-honorees), recognize

1 of 2 6/26/2016 11:54 AM

FILED: NEW YORK GULOUNTY CLERK 08/16/2018 01:31 PM IMADE NEW INDES OF SCHOOL OF THE PROPERTY O

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

this year's **keynote speaker**, **Elle Hearns**, publicize your firm or organization, or just share a message of your own—all while supporting the Guild!

See our dinner journals from the last six years here (https://www.nlg.org/dinner-journal-archives)

To submit your ad, complete the order form below and send the text of your message or camera-ready ad (as PDF or JPEG, at least 150 dpi) to <u>dinnerjournal@nlg.org</u> (mailto:dinnerjournal@nlg.org) by **June** 15, 2016. (NOW MONDAY, JUNE 27). If you are submitting a group ad, please be advised that we can only process one payment per order. All fees and materials must be received by the deadline to ensure inclusion in the journal.

Every dollar raised through ads goes to make the Guild a stronger and more effective force for justice. Your support means a lot to us. Thank you!

DINNER JOURNAL AD SIZES AND RATES

All dimensions are width x height in inches

Dinner Journal	A) Back Cover - 6 x 9 (Only one available!) - \$ 3,000.00
Ad *	○B) Inside Front or Inside Back Cover - 6 x 9 - \$ 1,000.00
	°C) Page Spread - 6 x 9 (two) - \$ 1,500.00
	D) One Full Page - 6 x 9 - \$ 850.00
	E) Half Page - 6 x 4.5 - \$ 500.00
	F) 1/4 Page - 3 x 4.5 or 6 x 2.25 - \$ 350.00
	○G) 1/8 Page - 3 x 2.25 - \$ 200.00
	○H) Your name/organization included on a list of NLG supporters - \$ 100.00
Total Amount	\$ 0.00
Email Address *	
Confirm Payment	J

To register for the 2016 #Law4thePeople Convention and learn more, visit <u>nlg.org/convention</u> (http://nlg.org/convention).

empowered by

2 of 2

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit C

NYSCEF DOC. NO. 65



David Abrams <dnabrams@bibliotechnical.com>

Ad for Dinner Journal

3 messages

David Abrams <dnabrams@bibliotechnical.com>

To: dinnerjournal@nlg.org

Sun, Jun 26, 2016 at 12:08 PM

Mon, Jun 27, 2016 at 1:53 PM

Hi, I am interested in placing the attached advertisement in the upcoming dinner journal.

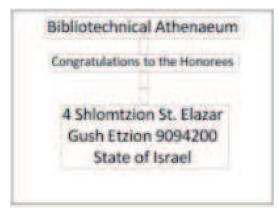
Is it a problem that the organization is Israeli? I realize that this is a sensitive issue.

If everything is okay, shall I pay the \$200 online with a credit card?

Thanks, Dave

Dave Abrams

2 attachments



dinner journal ad 062616.jpg 22K

dinner journal ad 062616.pdf

David Abrams <dnabrams@bibliotechnical.com>

Hi, further to my last e-mail, I have made the \$200 payment.

To: dinnerjournal@nlg.org

Thiorjournal@nig.org

I am re-submitting the ad in jpg and pdf form; Please let me know if there are any issues. Thanks, Dave

Dave Abrams

[Quoted text hidden]

--

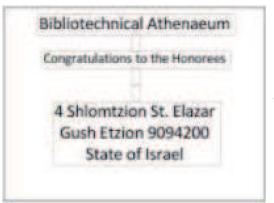
David Abrams Principal Officer Bibliotechnical B & W Ltd. 305 Broadway Ste. 601 New York, NY 10007 646-801-3456

2 attachments

1 of 2 9/26/2016 12:44 PM

19 of 119

NYSCEF DOC. NO. 65



dinner journal ad 062616.jpg 22K



NLG Dinner Journal (Law for the People Convention) <dinnerjournal@nlg.org>

Mon, Jun 27, 2016 at 2:03 PM

To: David Abrams <dnabrams@bibliotechnical.com>

Hi David,

Thank you for reaching out. Unfortunately, we have a resolution barring us from accepting funds from Israeli organizations. Your refund to your credit card will be processed tomorrow (there is a 24 hour waiting period before we're able to process any refunds).

Best, NLG National Office [Quoted text hidden]

2 of 2 9/26/2016 12:44 PM

RECEIVED NYSCEF: 08/16/2018 NYSCEF DOC. NO. 65



David Abrams <dnabrams@bibliotechnical.com>

Transaction Refund from National Lawyers Guild for \$200.00 (USD)

1 message

Auto-Receipt <noreply@mail.authorize.net> Reply-To: Pooja Gehi <director@nlg.org> To: David Abrams <dnabrams@bibliotechnical.com> Tue, Jun 28, 2016 at 10:54 AM

REFUND CONFIRMATION

Order Information

Description: Online Contribution: Dinner Journal

Invoice Number f4d1cec83cc25e4a4c3b

Billing Information Shipping Information

David Abrams PO Box 3353 Church Street Station New York, NY 10008 US

dnabrams@bibliotechnical.com

Total: \$200.00 (USD)

Payment Information

28-Jun-2016 7:54:06 PDT Date/Time:

Transaction ID: 8524820617 Payment Method: Visa xxxx8941 Refund

Transaction Type:

Auth Code:

Merchant Contact Information National Lawyers Guild New York, NY 10038 US

director@nlg.org

1 of 1 9/26/2016 12:45 PM

21 of 119

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit D



NLG #Law4thePeople Convention

August 2016
New York City
NYU School of Law



NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

Cover: Guild contingent at disarmament rally, New York City, 1982. From left: Teddi Smokler, Stanley Faulkner, Ned Smokler, Peter Weiss, Deborah Rand, Harry Rand, Victor Rabinowitz, Gordon Johnson, unidentified. Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.

Layout and Design by Tasha Moro

NYSCEF DOC. NO. 05

RECEIVED NYSCEF: 08/26/2018

Welcome to New York!

Dear fellow Guild members, supporters, and allies:

On behalf of the New York City Chapter, welcome to the NLG's Annual Banquet. Each year convention participants pause for an evening of celebration, to savor reflection with like-minded legal activists and recommit to the work of justice.

We hope you have enjoyed convening on campus, which was once the traditional format for NLG conventions, and that you have found the facilities amenable to productive work. Please join us in heartfelt thanks to New York University School of Law's Public Interest Law Center (PILC) for co-hosting the Convention, including Dean Trevor Morrison, Assistant Dean for Public Service Lisa Hoyes, Prof. Helen Hershkoff, NYU Law's Events Coordinator Josie Haas, Alesha Gooden, Nikita Chardhry, Ashley Martin, and Jerry Roman of NYU's Office of Housing Services. A special salute goes to Lisa Borge, Programs Manager of the NYU Law Public Interest Law Center.

The New York City Chapter has been fortunate to have generations of members who have worked in support of movements for social justice. They have founded projects that have gone on to become national programs or nonprofit organizations, and started law collectives, movement offices, and public interest law firms. They've been voices for the recognition of legal workers and mentors to generations of students. Some have been impactful judges. But our work has always benefited from our connection to our national organization, making us stronger and more effective.

Which brings us to our gathering this evening. The Annual Banquet, in addition to being a pause to celebrate and socialize, is above all the national organization's annual fundraising event. The NLG has not followed the trend of having high-ticket galas or events exclusively for major donors, so our annual gathering remains inclusive and affordable. That means the success of the national organization's sole fundraiser depends on us all stepping up to do our part. This year, we meet days after two national political conventions where the NLG was instrumental in defending the right of people's movements NOT to remain silent. Last month, the NLG was everywhere that people raised their voices against racist police killings. The importance of a national organization like ours is vital in these times.

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25



Guild members demonstrating at the New York Federal Building in NYCagainst U.S. aid to the Nicaragua Contras, 1984. (Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.)

Last year our wonderful member, Allan Botshon, made a transformative bequest to the NYC Chapter (stewarded by his friend and Chapter Director, Susan Howard). Our chapter shared a substantial part of Mr. Botshon's gift with the national organization which helped resolve

immediate financial challenges. The national organization now needs to build capacity to grow and meet the challenges of these perilous high-stakes times. If everyone tonight makes a pledge to the NLG Foundation, it will show immediate returns, helping the national organization progress and build capacity. Please consider making a pledge at tonight's banquet!

The New York City Chapter has been honored to host this year's Law for the People Convention, and we look forward to passing the baton to our sister chapter in Washington, D.C., host for the NLG's 80th Anniversary Convention next year. Thanks to the convention planning committee and volunteers for working to make this Convention a success. Two individual thanks are in order: Chapter Executive Director Susan Howard masterfully coordinated the many components of making the NLG's first on-campus national meeting in decades work, and former chapter president and National Office collective member Franklin Siegel secured the event venue and lodging facilities, as he did for the NLG's last summer convention 23 years ago. We thank the National Office staff—King Downing, Lisa Drapkin, Pooja Gehi, Daniel McGee, Tasha Moro, and Traci Yoder—for a truly enjoyable collaboration. We also thank NLG president Natasha Bannan for asking the NYC chapter to consider hosting the Convention.

Finally, please join in a rousing cheer for a comrade and NLG leader who inspired us all: MICHAEL RATNER PRESENTE!

In solidarity,

Carl Lipscombe, President and Susan Howard, Executive Director on behalf of the NYC-NLG Chapter NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

Program

Friday, August 5, 2016

7 PM-10 PM

7:30 PM	Welcome by Pooja Gehi & Natasha Lycia Ora Bannan
7:45 PM	Presentation of C.B. King Award to Emily Bock
7:55 PM	Presentation of Legal Worker Award to Noelle Hanrahan
8:05 PM	Remarks by Barbara Dudley and Carl Lipscome
8:15 PM	Presentation of Ernie Goodman Award to Michael Deutsch
8:25 PM	Presentation of Law for the People Award to Soffiyah Elijah
8:40 PM	Invite Attendees to Microphone
9:30 PM	Program Concludes

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

Law for the People Award Soffiyah Elijah

offiyah Elijah is the Executive Director of the Correctional Association of New York and member of the NLG-NYC Chapter.

An accomplished advocate, attorney, scholar and educator, Ms. Elijah is the first woman and the first person of color to lead the nearly 170-year old organization in its mission to create a fairer, more effective, and humane criminal justice system. Prior to joining the staff of the Correctional Association in March 2011, Ms. Elijah served as Deputy Director and a clinical instructor at the Criminal Justice Institute at



Harvard Law School. At the Institute, she trained hundreds of law students to become effective and ethical lawyers and to engage in local and national reform of criminal and juvenile justice policies.

A native New Yorker, Ms. Elijah practiced criminal and family law in New York City for more than 20 years. Before moving to Harvard, she was a member of the faculty and Director and supervising attorney of the Defender Clinic at the City University of New York School of Law. She was a supervising attorney at the Neighborhood Defender Service of Harlem, where she defended indigent members of the Harlem community, and has also worked as a staff attorney for the Juvenile Rights Division of the Legal Aid Society.

Honored by the Massachusetts Chapter of the NLG in 2010 and the NLG-NYC Chapter in 2015, Ms. Elijah has dedicated her life to human rights and social activism. She is a recognized national and international authority on human rights issues and has served as a justice on several people's tribunals focused on the U.S. government's response to Hurricane Katrina, the testing of bombs in Vieques, Puerto Rico, and conditions of confinement inside American prisons. She has authored several articles and publications on U.S. criminal and juvenile justice policy and prison conditions and is a frequent presenter at national and international forums.

Ms. Elijah earned her Bachelor of Arts from Cornell University and Juris Doctorate from Wayne State University Law School.

Each year the National Lawyers Guild gives the Law for the People Award to an individual whose work embodies the values that our membership holds dear. Previous recipients include Walter Riley, Standish Willis, Jan Susler, Judith Berkan, and Jim Lafferty.

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25

Ernie Goodman Award

Michael Deutsch

with the People's Law Office and a Guild member since 1970. From 1991-1996, he was the Legal Director of the Center for Constitutional Rights. Mr. Deutsch's legal career has been devoted to the representation of political activists and political prisoners. He was one of the criminal defense lawyers for the rebelling Attica prisoners, a coordinator of the Attica Brothers Legal Defense, and one of the class counsel in the Attica civil suit which, after two decades of litigation, resulted in a 12 million dollar settlement.



He was attorney for the five Puerto Rican Nationalist prisoners imprisoned in the 1950s who won an unconditional sentence commutation from President Carter in 1979, and represented Puerto Rican independentistas in Chicago, New York, and Hartford who were charged with seditious conspiracy, the Wells Fargo expropriation, and subpoenaed before federal grand juries. He also helped to develop the "Prisoner of War" claim under international law for Puerto Rican prisoners.

He has defended Black Panthers, Black prisoners facing the death penalty, and was part of the legal team that challenged the first use of the high security "control units" for men at Marion Federal Prison and for women at Lexington Federal Prison.

More recently, Michael successfully defended Chicago Palestinian community activist Muhammad Salah charged with Terrorism and RICO as well as Palestinian community organizers targeted by the FBI and subpoenaed to a federal grand jury.

Presently, Mr. Deutsch represents Rasmea Odeh, the deputy director of the Arab-American Action Network (AANN), a former Palestinian political prisoner and torture survivor, who has been charged with providing false information on her naturalization application, nine years after she received her citizenship. After her conviction in federal court in Detroit, her case was remanded by the Sixth Circuit to reconsider the exclusion of her PTSD expert.

Mr. Deutsch has written and lectured extensively on prisons, international human rights, and political repression.

Ernest "Ernie" Goodman (1906-1997) of Detroit was a founding member of the National Lawyers Guild and an influential civil rights and First Amendment lawyer. Each year the Ernie Goodman Award is awarded to a Guild lawyer who, within the past several years or currently, is engaged in legal struggle against financial, political, or social odds to obtain justice on behalf of those who are poor, powerless, or persecuted. The Goodman Award is given by the National Lawyers Guild Foundation.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

C.B. King Award **Emily Bock**

Presser Social Justice Fellow and Beasley Scholar at the Temple University James E. Beasley School of Law in Philadelphia, PA. She has also been awarded the Honorable Dolores Sloviter Public Interest Fellowship, the Henry Maxmin Scholarship, and a SPIN Public Interest Honors Grant. She graduated with her B.A. in English Literature and a concentration in Gender and Sexuality Studies from Haverford College in 2011.



Prior to law school, Ms. Bock was

a Haverford House Fellow and worked at Community Legal Services of Philadelphia and at the National Clearinghouse for the Defense of Battered Women. She also volunteered with the Pardon Me Clinic of X-Offenders for Community Empowerment (XCE), the Criminal Records Expungement Project of the Philadelphia Lawyers for Social Equity (PLSE), and the Restorative Justice Project at SCI-Graterford.

As a law student, she has worked with Community Legal Services of Philadelphia, Women Against Abuse, the New Jersey Office of the Public Defender, the Temple Legal Aid Office, the Sheller Center for Social Justice, and the Defender Association of Philadelphia. She was the 2014-2015 co-chair of the Temple Law National Lawyers Guild Chapter, and is a co-founder of the Temple National Lawyers Guild Expungement Project. After law school, Ms. Bock will clerk for one year in the Superior Court of New Jersey – Criminal Division. She hopes to pursue a career as a public defender or to work more broadly with people who are formerly incarcerated/those with past criminal legal involvement.

C. B. King (Chevene Bowers King, 1923-1988) was one of the country's most prominent and courageous civil rights lawyers. For over 30 years, he practiced law in Albany, Georgia, where he was a major figure in the civil rights movement. He was well-known for his courage, courtroom eloquence, and legal skills in the face of tremendous adversity and sometimes even violent opposition during the civil rights movement in Georgia. C.B. King was also a great teacher. In his office, on the streets, and in the courtroom, he taught several generations of law students and young lawyers how to practice law with a commitment to the poor, the disenfranchised, and the oppressed. A great many students underwent life-changing experiences under his tutelage.

INDEX NO. 653668/2016

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Legal Worker Award

Noelle Hanrahan

oelle Hanrahan, is a private investigator, investigative iournalist and Director of Prison Radio, as well as a member of the Guild's San Francisco Bay Area Chapter, and in years past, the Philadelphia Chapter. Since 1992, she has produced over 3,000 of Mumia Abu-Jamal's radio essays and brought his first book out of prison, Live From Death Row (Harper Perennial). She edited All Things Censored (Seven Stories Press, 2002), and with Stephen Vittoria, she produced the acclaimed theatrically distributed feature documentary



Mumia: Long Distance Revolutionary (Street Legal Film 2013).

Noelle is a graduate of Stanford University with a B.A. in Gender, Race, and Class Studies, as well as Boston University with a M.A. in Criminal Justice. She is board President of the Redwood Justice Fund and a board member and past board president of the Quixote Center. Global Audio Forensic Investigations is her investigation firm. She is currently working on *Abu-Jamal v. Kerestes*, which is on the front line of bringing lifesaving medical care to Pennsylvania inmates, and *Hanrahan v. Mohr* which is advocating for the First Amendment rights of the Lucasville 7+ on Ohio's death row.

Prison Radio challenges unjust, racist and sexist police and prosecutorial practices that result in mass incarceration and the literal disenfranchisement of huge segments of our population. Since 1990, Prison Radio has been at the forefront of the movement challenging mass incarceration. The prisoners we work with have complete editorial freedom. Prison Radio seeks to amplify their uncensored voices. Prison Radio contributes these voices to documentaries, features, and movies and makes them available on our website and via subscriber newsletters. We broadcast on over 1,200 radio stations and reach millions of listeners and viewers. Prison Radio is celebrating its 25th Anniversary in 2016 and is a project of the Redwood Justice Fund, founded by Judi Bari and Tanya Brannan, Esq.

The annual NLG Legal Worker Award is given to a Guild member whose legal support work has demonstrated leadership in the organization, marked by one or more notable accomplishments, and recognized by their peers.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Debra Evenson Venceremos International Award **Audrey Bomse**

udrey Bomse has been a lawyer since 1980 and an activist basically all her life. She practiced criminal law in the U.S. for many years as a Public Defender and later civil rights law, representing the interests of the class of state and county inmates at the New Jersey Office of Inmate Advocacy.

In 2001, Audrey moved to Palestine to work as a Human Rights lawyer for seven years, largely focusing on the issue of Palestinian political prisoners. Her last position was legal director of the United Against Torture Coalition,



comprised of twelve NGOs working to prevent and combat torture. In that capacity she presented the coalition's "Alternative Report on Israel" to the UN Committee Against Torture in Geneva.

Audrey was a passenger on the second voyage of the Free Gaza Movement (FGM) in November 2008 and was subsequently detained for 4 days upon her return to Israel and was eventually deported. She then moved to London where she worked on legal issues involving the Israeli naval assault on the subsequent Freedom Flotillas to Gaza and associated issues. She moved to Miami in 2011.

Audrey was a member of the NLG delegation to Tunisia almost immediately after the revolution and, because her daughter and family live in Tunis, she has been there many times since. A particular interest of hers has been the transitional justice process - or lack thereof. Audrey was also a member of the NLG delegation to Egypt and has been actively working to support the Egyptian human rights movements.

Audrey has been an active member of the National Lawyers Guild for 30 years, past co-chair of its Prisoners' Rights Committee and current (long-standing) co-chair of its Palestine Subcommittee.

Former Guild President Debra Evenson (1942-2011) was one of the visionary architects of Cuba's legal system, and a staunch defender of the country at home. The award is presented by the International Committee in recognition of brave work to extend justice beyond borders.

The 2016 Debra Evenson Venceremos International Award was presented at the joint International Committee and Labor and Employment Committee Reception.

INDEX NO. 653668/2016

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Carol Weiss King Award Javier Maldonado

private practice best known for his groundbreaking work at the intersection of immigration and criminal law. He is responsible for establishing a wide range of precedent in the Fifth Circuit limiting the reach of the aggravated felony provision of the INA including *Kern v. Holder* (Florida false imprisonment is not an aggravated felony), *Paez Sarmientos v. Holder* (Florida sale of a controlled substance is not a drug trafficking offense), *Davila v. Holder* (New York sale of a controlled substance is not



an aggravated felony), and *Serna Guerra v. Mukasey* (Texas unauthorized driving of a vehicle is not an aggravated felony).

He regularly presents at state and national conferences on civil rights and immigration law and advises attorneys litigating cases in those areas. Maldonado is the previous Executive Director of the Texas Lawyers' Committee where he conducted impact litigation in the area of immigrants' rights. At the Lawyers Committee, Maldonado secured victories in *Martinez* Aguero v. Gonzalez, in which the Fifth Circuit affirmed that noncitizens stopped at the border are protected by the Fourth Amendment, and Ramirez Molina v. Ziglar, in which the Fifth Circuit held for the first time that noncitizens previously deported have the constitutional right to challenge their prior removal order. Prior to the Lawyers Committee, Maldonado served as a trial attorney at the Equal Employment Opportunity Commission where he litigated employment discrimination cases. Maldonado also served for three years as a staff attorney with the Mexican American Legal Defense and Educational Fund (MALDEF). He was born in Matamoros, Mexico and immigrated to the United States in 1974. Maldonado earned his B.A. and J.D. at Columbia University. Following law school, he clerked for U.S. District Court Judge George P. Kazen in Laredo, Texas. Today, Maldonado lives and works in San Antonio, Texas.

The National Immigration Project of the National Lawyers Guild awards the Carol Weiss King Award annually for excellence in the pursuit of social justice through organizing, litigating, and teaching. The award has honored dozens of individuals whose work has significantly advanced human and civil rights for all. Prominent U.S. lawyer Carol Weiss King (1895-1952) specialized in immigration law and the defense of the civil rights of immigrants, and was a founding member of the National Lawyers Guild.

The 2016 Carol Weiss King Award was presented at the Keynote Address.

INDEX NO. 653668/2016

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Arthur Kinoy Award Albert Woodfox

Louisiana, one of six children raised by a single mother. By the time he was a young adult, he had succumbed to the lure of the streets and found himself behind bars in a state that now has the distinction of being the forerunner when it comes to mass incarceration. His encounters with the law landed him in the notoriously dangerous Louisiana State Penitentiary (known as "Angola").



By 1977, two courts had concluded that state and federal constitutional violations

were rampant in the facility, one noting that conditions at Angola "shock the conscience of any right thinking person." In the 1960s and 1970s, Angola was segregated. By the early 1970s, Angola did not even have African American employees. In this volatile climate, Albert Woodfox and the late Herman Wallace courageously founded a prison chapter of the Black Panther Party. Robert King later joined them in their campaign for fair treatment and better conditions for inmates, racial solidarity between black and white inmates, and an end to the rape and sexual slavery that was then endemic in the prison. In an effort to quell their organizing, they were framed for murders and placed in solitary confinement, known as "Closed Innocence" and mounted their own defense for over twenty years until a local support group was formed and legal representation followed. Thereafter, their support expanded to a national and then an international coalition. What was initially a case soon became a campaign and then a movement.

The movement seeks to disrupt unjust and inhumane practices wherever they exist. After emerging from 43 horrific years in solitary confinement, Albert joined the effort that he inspired. When asked to explain how it is that he defied so many odds, Albert says: "If a cause is noble, you can carry the weight of the world on your shoulders." Albert spends his days making presentations, advocating for policy changes and legal reforms, and enjoying the company of his daughter, grandchildren, great-grandchildren, the Angola 3 support team, and his immense conglomerate of family, friends, and associates.

Albert is a victim of racism, abuses of power, prosecutorial misconduct, instances of judicial indifference, and official corruption, but he chooses his legacy to be that of an overcomer.

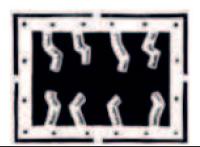
The Arthur Kinoy Award was established in 2008 as an occasional award given in the spirit of beloved member Arthur Kinoy. The inaugural recipient was former Jailhouse Lawyer VP Paul Wright. While there are no formal guidelines for the award, on special occasions it may be given to those individuals whose work and passion would have especially appealed to Arthur.

The 2016 Arthur Kinoy Award was presented at the Keynote Address.

INDEX NOEX 693668/202166 RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

Honoring Albert Woodfox Frederick Douglass was right:

"Find out just what any people will quietly submit to and you have found out the exact measure of injustice and wrong which will be imposed upon them."



You never stopped fighting; we are all stronger thanks to you.

Deborah & Henry Willis

So proud of all the honorees!

You Always Stand for Justice No Matter What!

> Bill Quigley New Orleans

VAN DER HOUT, BRIGAGLIANO & NIGHTINGALE, LLP

SPECIALIZING IN ALL ASPECTS OF IMMIGRATION AND NATIONALITY LAW

Congratulations Michael, Javier, Audrey, and all the other honorees for your

dedicated work promoting and defending the civil rights of all!

MARC VAN DER HOUT | ZACHARY NIGHTINGALE | STACEY GARTLAND CHRISTINE BRIGAGIIANO, OF COUNSEL | KATHERINE M. LEWIS | VALERIE ANNE ZURIN | JENNIE C. LIU AMALIA WILLE | GENNA BEIER | ALISA WHITTIELD | MEGAN SALLOMI | BETH COHN-MINTZ

SAN FRANCISCO

VBLAW.COM

ΡΑΙΟ ΛΙΤΟ

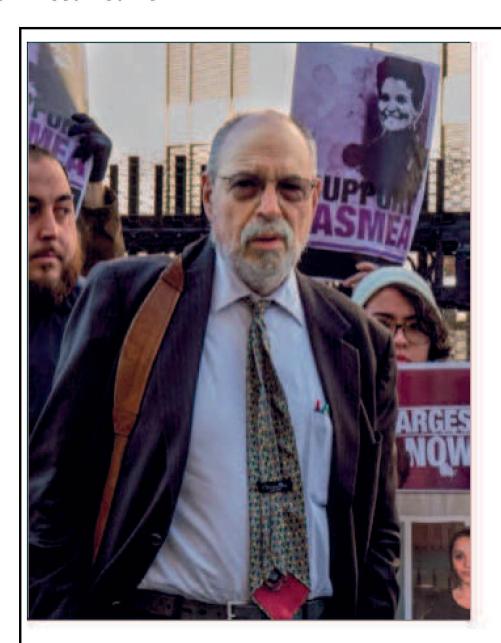


99 Hudson Street, 12 FL, New York, NY 10013 T: 212.966.5932 www.aaldef.org FB: bit.ly/aaldef Twitter: @aaldef

Congratulations to Michael Deutsch on his hard earned and well deserved award in recognition of his tireless efforts as a true lawyer for the people.

> Peter Schmiedel and Susan Mitchell

RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017



Congratulations to the Remarkable

Michael Deutsch

Our comrade, friend, mentor, and most worthy recipient of this year's Ernie Goodman Award!

Fighting for the Attica brothers, the self-determination of the Puerto Rican and Palestinian Peoples and their political prisoners, the targets of Grand Jury abuse, and many other freedom fighters and targets of racist and political repression for 46 years. You are, and always have been, a wise leader, a lawyers' lawyer, an activist's activist, and a brilliant political and legal strategist.

Congratulations to Soffiyah Elijah and all 2016 NLG Award winners

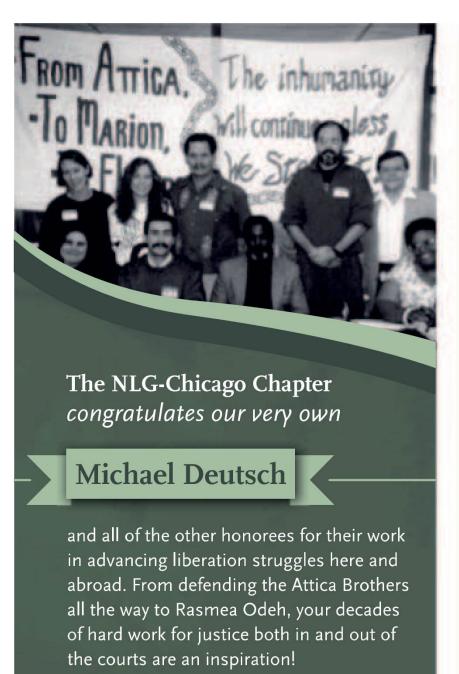
Freedom for Rasmea! Free Oscar López Rivera! **Black Lives Matter!** Reparations Won!

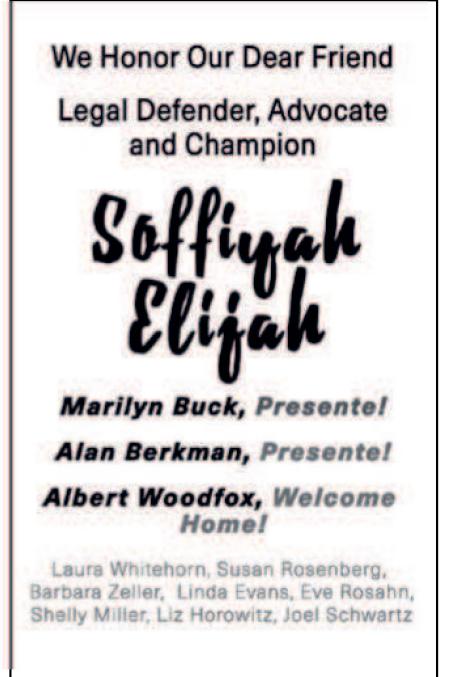
La Lucha Continua! The People's Law Office Family

Alexis, Ben, Brad, Flint, Kris, Jan, Jani, John, Joey, Lourdes, Sarah, Shubra, Dennis, Jeff & Pat



NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25 RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017





I AM BOTH HONORED & HUMBLED TO BE AMONG SUCH DISTINGUISHED RADICAL LEGAL and political **ACTIVISTS!**

- AUDREY





Congratulations, Audrey, for this well-deserved award. We are proud to know and work with you.

The Free Gaza Movement Board

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

CONGRATULATIONS TO ALL THE HONOREES, Especially for my Good Friend Michael Deutsch.

JIM FENNERTY

Javier

When you smile, the whole world smiles with you!

Congratulations on this muchdeserved recognition!

Trina and Mary



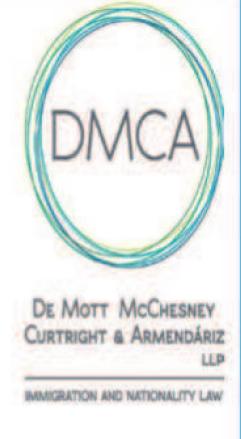
Congratulations to our friend and esteemed colleague Javier Maldonado on receiving the Carol Weiss King Award!



Your relentless pursuit of social justice through litigation and education has made a significant impact in our field and has inspired many.

Congratulations to all the NLG honorees!

- De Mott, McChesney, Curtright & Armendáriz, LLP



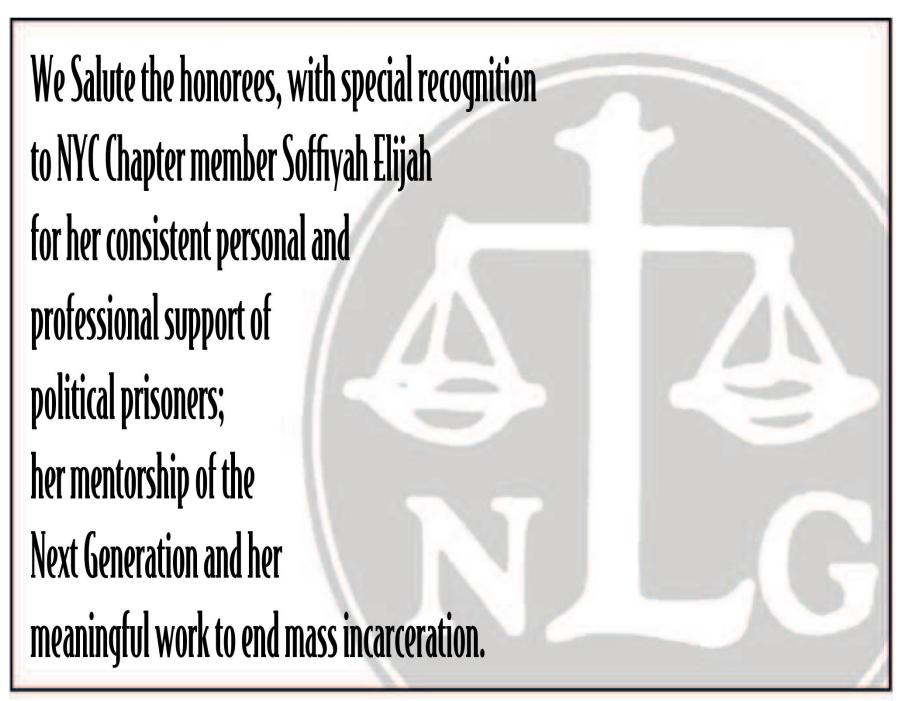
San Antonio/Austin/Houston Texas

WWW.DMCAUSA.COM

DMCA: BUILDING COMMUNITY, ONE PERSON, ONE FAMILY, ONE BUSINESS AT A TIME.

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25



THE PHILADELPHIA CHAPTER

OFTHE NLG

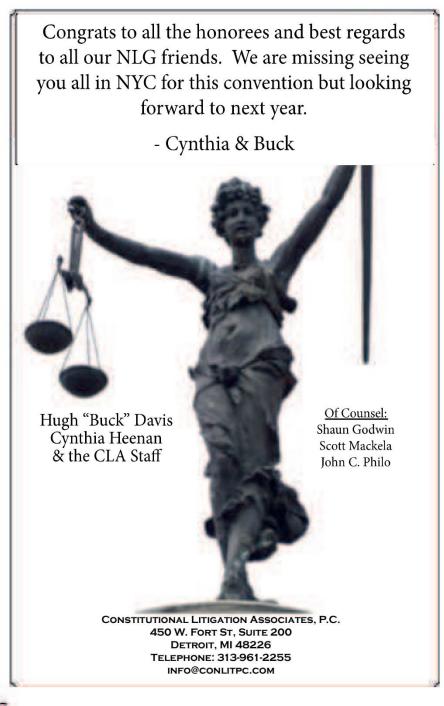
CONGRATULATES

EMILY BOCK

ONE OF PHILLY'S BEST AND BRIGHTEST

> ON THE C.B. KING AWARD





RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

INDEX NO EX 693668/2016

SEGAL & GREENBERG LLP

Salutes

Audrey Bomse, Soffiyah Elijah, Albert Woodfox, Javier Maldonado, Emily Bock, Michael Deutsch, and Noelle Hanrahan

> For Their **Advocacy and Vision**

Philip C. Segal Margery A. Greenberg

William R. Dalsimer Louise Gruner Gans Cindy S. Singh Stephen M. Latimer

179 Franklin Street New York, New York 10013 (212) 297-0503 www.segal-greenberg.com

Congratulations to all of tonight's outstanding Honorees

ATTORNEY AT LAW

WORKERS' COMPENSATION ● SOCIAL SECURITY DISABILITY EMPLOYMENT DISCRIMINATION • CIVIL RIGHTS

65 LENOX ROAD #1E ● BROOKLYN, NY 11226 (347) 413-9014 GEOFFREY.SCHOTTER@GMAIL.COM

WWW.SCHOTTERLAW.COM

Congratulations to all the NLG awardees. You are awesome.

Walter Riley, Law Office 1440 Broadway, Suite 612A Oakland, ČA 94612 **(510)** ■ walterriley@rrrandw.com

CONGRATULATIONS TO THE 2016 NATIONAL LAWYERS **GUILD HONOREES**

-Joseph Lipofsky

NYSCEF DOC. NO. Ø5 RECEIVED NYSCEF: 09/26/2018

Felicitaciones Javier

Es un orgullo para nosotros conocerte y trabajar contigo.

Your patience, guidance and wisdom are unparalleled. Your remarkable work has advanced the rights of all immigrants. We admire that you never back down from a tough case and that you're always willing to push the envelope.

From Deep in the Heart of Texas

Carlos Garcia Garcia and Garcia, McAllen, Texas

Denise Gilman, Austin, Texas

Barbara Hines, Austin, Texas

Ranjana Natarajan, Austin, Texas

Erica Schommer, San Antonio, Texas

Stephanie Taylor, Hansen and Taylor, Austin, Texas

Lee Teran, San Antonio, Texas

Frances Valdez, FValdezLaw, Houston, Texas

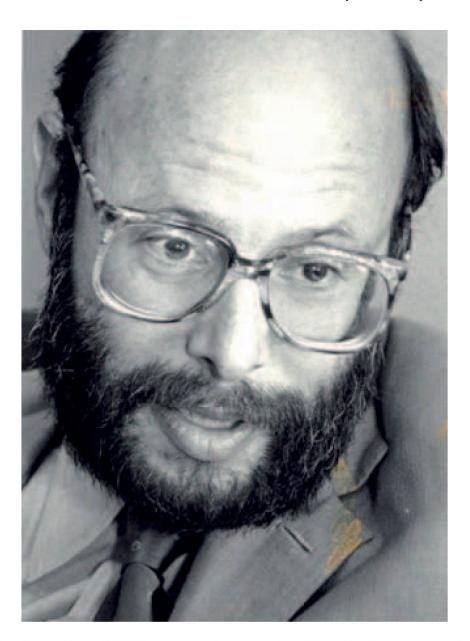
Jennifer Walker Gates, Chito Vela and Susannah Volpe Walker Gates Vela, Austin, Texas

> Kate Lincoln-Goldfinch Lincoln Goldfinch Law, Austin, Texas

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

HONORING MICHAEL RATNER

Michael Ratner was truly a revolutionary lawyer. He embodied the spirit of the National Lawyers Guild's founders who believed that the law could and must be used to protect those dissidents and revolutionaries who were most despised and persecuted by reactionary and anti-democratic governments around the world, especially our own.



Michael speaking at 1987 press conference about Ben Linder, who was tortured and murdered by the US-backed Contras while he was helping to build a hydroelectric plant in Nicaragua. Michael and CCR represented Ben's family, seeking redress against Contra leaders and the US government.

Because of Michael's leadership of the Guild and the Center for Constitutional Rights, US imperialism was exposed and undermined, and an anti-imperialist movement gained strength and legitimacy.

Michael's leadership, legal acumen and personal courage provided inspiration for generations of Guild lawyers and law students. He leavened his brilliant mind and creative legal skills with love and humor, and an abundant energy. His work, his laugh, his irony and his enduring belief in the revolutionary spirit of the oppressed will live on.

NYSCEF DOC. NO. 05 RECEIVED NYSCEF: 09/26/2018

The Presidents of the Guild are gratified to know that Michael's spirit and inspiration are embodied in this year's honorees.

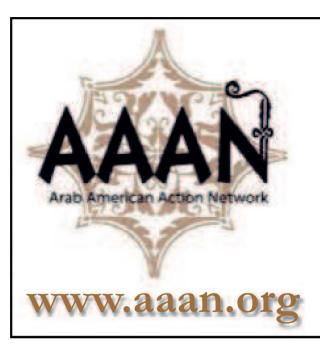
MICHAEL RATNER, PRESENTE!

Michael Avery Natasha Lycia Ora Bannan John Brittain Marjorie Cohn Barbara Dudley Peter Erlinder David Gespass Bill Goodman Paul Harris Karen Jo Koonan Jim Larson **Bruce Nestor** Azadeh Shahshahani Marc Van Der Hout **Doron Weinberg**

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

INDEX NO EX 693668/202166

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25



AAAN salutes NLG and the venerable Michael Deutsch for their incredible work defending the rights of Palestinians in Chicago!

If we see only the worst, it destroys our capacity to do something. If we remember those times and places-and there are so many-where people have behaved magnificently, this gives us the energy to act, and at least the possibility of sending this spinning top of a world in a different direction. And if we do act, in however small a way, we don't have to wait for some grand utopian future. The future is an infinite succession of presents, and to live now as we think human beings should live, in defiance of all that is bad around us, is itself a marvelous victory. - Howard Zinn

To Michael Deutsch

Justice is a constant struggle thanks for your constancy Congratulations on a well deserved award.

Susan Kaplan & Len Cavise

Conrad Johnson, Brenda Eberhart, Brian Donnelly and Mary Zulack unite in praising Our hero, the one and only Javier Maldonado During student days at Columbia Law School we saw your determination to right all wrongs. We knew you would change the world in important and positive ways- To you, and equally to your wife and children, we say: CONGRATULATIONS

WILLIAM ROTHBERG

LAW OFFICES OF WILLIAM ROTHBERG

16 COURT STREET BROOKLYN, NEW YORK 1124L (718) 624-2200

BILL & ELLEN

¡PRESENTE!

In the 1970's the Guild was getting its Military Law Project in Southeast Asia (now called the Military Law Task Force) started while the war in Vietnam was winding down. A couple, Bill Schaap and Ellen Ray, volunteered to go to Okinawa to start and steer the Project's operation there. They organized and administered superbly. Their legacy lives. Okinawa was probably our most active outpost. Like other founders of the Military Law Task Force, they stayed close to the peace, justice, and opposition to empire that inspired the founding. In the past year, Ellen died, then Bill did. We owe them much.

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017



Dare to Struggle

Dare to Win!

Lynne Stewart Ralph Poynter CONGRATULATIONS JAVIER, ON A WELL DESERVED AWARD!

Hines & Leigh

1005 E. 40th St. Austin, TX 78751 (512) 452-0201 www.hines-leigh.com

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

We Salute AUDREY BOMSE

and her fellow honorees

Audrey is a global people's lawyer whose dedication, innovation and commitment inspires us all to struggle for a world of justice and liberation.

Suzanne Adely Marjorie Cohn Jeff Frank John Fussell Katie Gallagher Steven Goldberg Zaha Hassan Arthur Heitzer Human Rights Defense Center
Kerry McLean
Daniel Meyers
Jeanne Mirer
NLG Cuba Subcommittee
William Quigley
Andrew Reid
Lucy Rodriguez

Ann Schneider
Susan Scott
Newland Smith
Judy Somberg
Uri Strauss
Jan Susler
Paul Wright
Emily Yozell

THANK YOU TO MICHAEL DEUTSCH FOR ALL YOUR WORK!

From Margaret P. Levy, West Hartford, CT The Quixote Center Board and Staff congratulate you, Noelle, our friend and companion in seeking justice.

You are an inspiration.



For Michael Deutsch who richly deserves the Ernie Goodman Award

Marty Stolar & Elsie Chandler

INDEX NO.EX 693668/2016 RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

CONGRATULATIONS...

...to all 2016 Convention Honorees, including NPAP members Michael Deutsch and Javier Maldonado, for their outstanding contributions to ensuring justice for all.

> National Police Accountability Project 499 7th Ave., New York, NY www.npapjustice.org

Three great reasons for our active, committed support of the **National Lawyers Guild: Audrey Bomse, Michael Deutsch,** Soffiyah Elijah.

> Lucky Us. **Dan Meyers** Joan Max Reinmuth

For their dedication to justice and especially to the freedom for all U.S. political prisoners, I salute Mike, Soffiyah, Audrey and Noelle

Free Palestine!

Bob Boyle

Sincere appreciation to the NLG National Office Staff

Daniel McGee King Downing Lisa Drapkin Tasha Moro Traci Yoder Pooja Gehi

from former NLG National Office Staffs and Collectives

Holly Sullivan Hazleton Carlin Meyer Phyllis Bennis Ian Head Rick Best Jamie Munro Alicia Kaplow Dana Biberman Vernell Pratt Karen Jo Koonan Heidi Boghosian Corinne Rafferty Jeffrey Kupers Kevi Brannelly Franklin Siegel Sylvia Cedillo Wini Leeds Gunnar Sievert Joseph Lipofsky Kenneth Cloke Marina Sitrin Bernadine Dohrn Michel Martinez Hizabeth St. Clair Daniel Mayfield Barbara Dudley Deborah Weimer Carol Grumbach Dale Wiehoff

Michael Ratner presente!

RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25



Congratulations to All This Year's Honorees

From

The John Marshall Law School Restorative Justice Project

Bringing Peace and Justice to the Chicago Public Schools

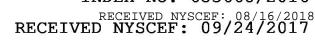
315 South Plymouth Court Chicago, Illinois 60604 312-427-2737 www.jmls.edu The Rosenberg Fund for Children salutes our friends

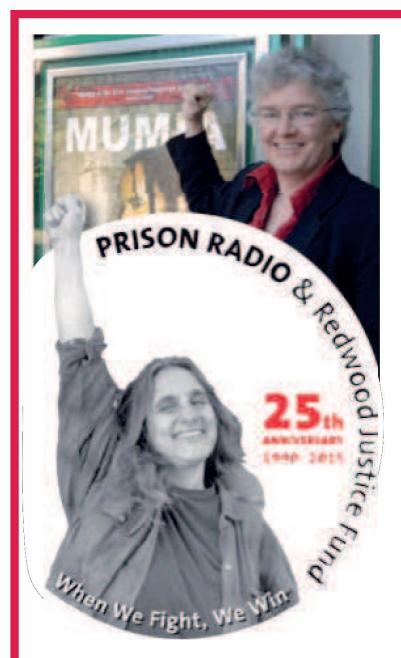
Michael Deutsch Soffiyah Elijah Noelle Hanrahan & the other honorees

for their unyielding work for justice



www.rfc.org





The Redwood Justice Fund

(founded by Judi Bari & Tanya Brannan, Esq.)

Salutes NLG Legal Worker of the Year 2016 Noelle Hanrahan, P.I.

"Noelle has dedicated her life to helping prisoners speak to the other citizens of this society. She is one of the most effective prison right investigators in the country because she doesn't speak for the prisoners, she makes it possible for us to hear them speak for themselves. I think Noelle deserves this award because she gets work done. And she isn't afraid to win."

Board Vice President Karen Rudolph, Esq.

Bit.ly/PrisonRadio

In Memory of our Friend Michael Ratner

Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C. New York, New York

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

TERRY GILBERT & JACQUELINE GREENE

Extend their congratulations to

Michael Deutsch

as recipient of the Ernie Goodman Award and for all the great work he has done on behalf of political prisoners and oppressed people.

FRIEDMAN & GILBERT

55 Public Square, Suite1055 Cleveland, Ohio 44113 FriedmanAndGilbert.com

The National Lawyers Guild thanks the following supporters

Sheila Dugan
The Jericho Movement for Amnesty and w
Freedom for All Political Prisoners
Carlin Meyer
William "Bill" Montross
Maria Baldini-Potermin
Deborah Rand
Rebecca Shapless

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017 NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

INDEX NO.EX 693668/202166

Congratulations

Soffiyah Elijah

2016 Law for the People Award Honoree We salute you for your steadfast commitment to the human rights and dignity of all incarcerated people, and for having led the CA with honor, courage, and distinction for the past five years.

We love you.

The Correctional Association of New York



Thank you Honorees for your steadfast commitment to Justice.

> Thank you NLG for being there for people in struggle.

Holly Maguigan and Abdeen Jabara

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

Matt Piers, Kalman Resnick and the law firm of HSPRD congratulate our friend and colleague

Michael Deutsch

for an outstanding career, fighting in the courts for justice and social progress.

70 West Madison Street, Suite 4000, Chicago, IL



NYSCEF DOC. NO. Ø5

We join the NLG in celebrating Audrey Bomse's lifelong work as a fearless political and social justice activist, as well as a passionate "lawyer for the people". We continue to be inspired by your dedication and commitment to just causes across the globe. You are not only a tireless fighter but also a wonderful, attentive and loving mother, grandmother and friend. Thank you for being who you are.

Venceremos!

Love, Your family and friends

Dan, Corinna, Brahim, Margot, Sydney, Josh, Kacie, Julien, Margarita, Maggie, Susan, Val, Azadeh, Hal, Yonit, Anaheed, Malik, Ann, Ujju, Greta, Sultana, Amaranta, Hilary, Lubna, Mireille, Lillian and Larry

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25

Congratulations to the courageous Albert Woodfox, Noelle Hanrahan and all of this year's honorees. Many thanks to the National Lawyers Guild for your tireless work for human rights, civil liberties and social justice.

-People's Rights Fund

So proud of all the honorees!

You Always Stand for Justice No Matter What!

> Bill Quigley New Orleans

Ethel Rosenberg was not a spy and her execution was wrongful

#ExonerateEthel



Sign the petition at rfc.org/ethel calling on President Obama to exonerate Ethel

> Stop by the Rosenberg Fund for Children table or visit rfc.org/ethel to learn more

Congratulations!

Soffiyah Elijah (Law For the People Award) Noelle Hanrahan (Legal Worker of the Year).

"Greetings, my friends at the NLG. On a move. Congratulations to all the honorees at this year's convention. Shout out to Sister Soffiyah Elijah, a freedom fighter in the law. She laughs when I tell her I thought she was a Jewish woman years ago.

What does Noelle Hanrahan bring to the table, besides her relentless energy honed on the basketball courts of Stanford? She brings a vision, actualized in Prison Radio, which performs a unique function. It breaks down walls. It brings the voices of the damned, the imprisoned, the oppressed and the dispossessed to you, to millions in America. That, in a time when presidential candidates clamor to build yet more walls is a prodigious and noble feat in itself that deserves your plaudits and praise.

For as many of you have heard me say a hundred times before, America is the prison house of nations. Anything that pulls bricks out of that monstrosity should be applauded. She is, too, a dogged researcher who, as a licensed private investigator, digs into the detritus of the criminal justice system to uncover evidence of violations of the constitution and laws that judges swear to uphold. For this, too, she deserves your kudos.

Thank you for your time. To all your honorees, congratulations. And Noelle? Nicely done.

> From imprisoned nation, this is Mumia Abu-Jamal. bit.ly/PrisonRadio

Comradely Greetings from the Seattle Chapter Congratulations to all of this year's Honorees

Congratulations to Soffiyah Elijah who is always for the people!

Elizabeth Sackler & the Sackler Center family

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

The International Committee's Palestine Subcommittee says,

THANK YOU, AUDREY!!

for being the Rock of Gibraltar that we depend upon being there for us, always, to save us from our own gaffs of analysis and judgment; hit the nail on its head every time; send us every newsworthy article, courtesy of the Audrey Bomse Palestine/Israel Clearinghouse; and serve us with such love, humor, and deftly light touch as Mother-Hen-in-Chief, without which there would not be a Palestine Subcommittee.

We love you, we need you, and will you still be there when we're 84?

Congratulations to our dear friend Michael

on this well deserved award! We appreciate and admire your years of selflessly supporting the Attica Brothers, the Black Liberation Movement, the Puerto Rican Independence movement, the struggle of the Palestinian people, and other antiracist and anti-imperialist struggles.



From your Knowledge Group friends in Chicago who rely on your thought provoking and insightful analysis. Erica, Ginger, John, Margaret, Melinda, Susan, and Steve

THE INDIANA CHAPTER OF
THE NATIONAL LAWYERS
GUILD CONGRATULATES
MICHAEL DEUTSCH ON
HIS RECEIPT OF THE ERNIE
GOODMAN AWARD AND
THANKS HIM FOR HIS WORK
ON BEHALF OF POLITICAL
PRISONERS EVERYWHERE.



Congratulations to Michael Deutsch

From Attica to Puerto Rican independistas to Muhammed Salah to Rasmea and beyond, you have always been there for our people!

Steven Saltzman 200 S. Michigan, Ste. 201 Chicago, Illinois 60604 (312) 427-4500 SSaltzlaw@gmail.com

> Michael, our friend and mentor

> > Ed & Lorry

The International Committee Celebrates and Congratulates Audrey Bomse, Co-Chair of the Free Palestine Subcommittee and Deserving Recipient of the Debra Evenson Veneceremos Award for International Human Rights Work.

Here she is with the 2011 Joint Guild Delegation on the Streets of Tunisia.



Le Dressay & Company

Le Dressay & Company is proud to support the important work of the National Lawyers Guild.

Le Dressay & Company represents clients in complex commercial, civil, and criminal litigation in Canada and the State of Arizona.

| #103-1525 West 8th Avenue, Vancouver, BC V6J 1T5 |

| T: 604-739-0017 | F: 604-739-0041 | www.ledressay.com | Artwork courtesy of Jeff Wilson (jeffwilsonart.org)

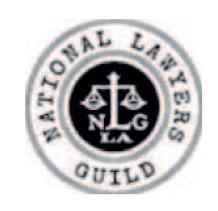


RECEIVED NYSCEF: 08/16/201
RECEIVED NYSCEF: 09/24/2017

The Los Angeles Chapter of the National Lawyers Guild salutes this year's #Law4ThePeople Honorees:

Soffiyah Elijah Albert Woodfox Michael Deutsch Audrey Bomse Javier Maldonado Noelle Hanrahan Emily Bock

"We need to do more than just what is right.
We need to join together and right what is wrong."
-Leonard Peltier



RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25

Congratulations, Javier!

Looking forward to seeing the work of your Latino litigator superpowers in the years to come.

Andrade Legal

Immigration Law

The Law Offices of Dorfman & Dorfman 72 Guy Lombardo Ave #2 | Freeport, NY 11520 (516) 379-0500

Congratulations to the Guild

for its longtime struggle for

peace and justice.

Congratulations, Audrey, for a well deserved award! And congratulations to all the honorees for your important and amazing work.

- Cathy Dreyfuss

Congratulations Emily on the C.B. King Award!

We're so proud of you!

Your Temple Law family

The NLG National Office congratulates the **National Immigration Project** of the NLG on their 45th year of fighting for immigrants' rights.

Happy anniversary, NIPNLG!



I want to thank the National Lawyers Guild for all the help they have given to Veterans for Peace to effect the freedom to stand at the Vietnam Memorial in New York City 24/7.

-John K. Spitzberg

Past President, Local 099 Veterans for Peace, Industrial Workers of the World

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

INDEX NO EX 693668/202166

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

The **DC NLG chapter** acknowledges honorees Albert Woodfox, practitioner Michael Deutsch and ALL of the honorees at the 2016 Law for the People Convention.

Please join us in **August 2017** for the **80th Anniversary** Law for the People Convention, in Washington, DC! We will mark this special anniversary with a great convention, including radical lawyers, activists, guests and freedom fighters from across the country.

Hope to see you there!



Congratulations to Chicago NLG member Max Suchan, the first NLG Leonard I. Weinglass Memorial Fellow!

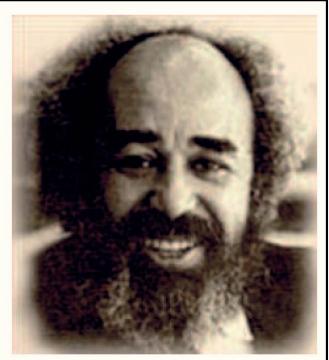
Max will be working with the Chicago Community Bond Fund to increase volunteer capacity and help develop organizational strategies to end money bond.

The Weinglass Fellowship will be offered annually a new Guild attorney to work on a specific civil rights or civil liberties project.

Congratulations to the

Congratulations to the 2016 NLG Haywood Burns Memorial Fellows!

The Haywood Burns Fellowships are designed to encourage projects in the NLG's tradition of "people's lawyering." The program exists to help students and legal workers apply their talents and skills to find creative ways to use the law to advance justice.



2016 Haywood Burns Fellows

Daniel Fryer, University of Michigan Law School Equal Justice Initiative

Martha Laura Garcia, Loyola University Chicago School of Law Illinois Migrant Legal Assistance Project

Joelle Eliza M. Lingat, CUNY Law Northeast New Jersey Legal Services Employment Opportunity Project

Anya Morgan, University of Texas School of Law Sylvia Rivera Law Project

Crystal Peters, Brooklyn Law School Center for Popular Democracy

Mark Shervington, Legal Worker NYC-NLG Parole Preparation Project

Special thanks to all those NLG members and allies who donated to the 2016 Haywood Burns Fellowship Fund!

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

YOU'RE NOT AS YOUNG AS YOU USED TO BE.

DON'T LET THE VISION DIE.

REMEMBER THE GUILD IN YOUR WILL.

National Lawyers Guild Foundation

132 Nassau Street Room 922 • New York, NY 10038 (212) 679-5100 ext. 16 nlgfoundation@nlg.org



NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

2015 Banquet Donors

The National Lawyers Guild Foundation thanks our generous donors. Your support helps build a stronger Guild!

Abenicio Cisneros Alice Jennings-Edwards

Arthur Heitzer Avra Wing

Azadeh Shahshahani Barbara Dudley

Barbara Newman Barbara Rhine Benjamin Stein

Carpenter & Mayfield

Cathy Dreyfuss

Constance Carpenter Cynthia Heenan Dalisai Nisperos Dave Mitchell

David Gespass

David Hettick

Diana Rothman Elba Galvan Gabriela Lopez

Goodman & Hurwitz, P.C.

Hannah Adams

Henry & Deborah Willis

Jalle Dafa

James Fennerty James Klimaski Jean Stevens Jeanne Mirer

Jeffrey Petrucelly Jon Schoenhorn Joseph Berra

Judy Somberg

Karen Jo Koonan Katherine Lewis

Kris Hermes

Larry Hildes

Liz Jackson

Lynne Wilson

Marc Van Der Hout

Maria Andrade Marjorie Cohn

Martha Schmidt Matthew Ross

Mattie Armstrong

Mike Godbe

Nancy Hormachea Nanette Kripke Natasha Bannan

National Immigration Project of the NLG

Neil Fox

NLG New York City Chapter

Noreen Farrell Pasquale Lombardo Priscilla Orta-Wenner R. Michael Flynn Rachel Gendell

Richard P. Koch

Richard Soble & Barbara Kessler

Rudy Balderama Sasha Novis Sonya Mehta Stephen Bingham Steven Goldberg Theresa Kleinhaus Tim Hoffman

Urszula Masny-Latos

Val Carlson

William Monning

We make every effort to correctly list each donor's name and extend our heartfelt apologies for any mistakes. Please contact nlgfoundation@nlg.org for corrections.

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM INDEX NO. 653668/2016

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit 2

INDEX NO. 653668/2016

NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 09/26/2018

The Lawfare Project 633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995

Supreme Court of the State of New York County of New York

)
Bibliotechnical Athenaeum,)
Plaintiff,)
) Index No. 653668/2016
- against -	
National Lawyers Guild, Inc., &) Amended Complaint
The National Lawyers Guild)
Foundation, Inc.)
Defendants.)
)
)

Plaintiff, complaining of the Defendants by its attorney, Benjamin Ryberg, Attorney at Law, respectfully sets forth and alleges as follows:

I. Introduction

- 1. This is an action for unlawful discrimination under the New York City and State Human Rights Laws. As set forth in more detail below, the Defendants, a place or provider of public accommodation, have unlawfully denied such public accommodation to the Plaintiff on the grounds of its Israeli citizenship and national origin.
- 2. More specifically, the Defendants refused to permit Plaintiff to participate in its Annual Banquet to be held in New York in August of 2016 by refusing to sell Plaintiff advertising space in its Dinner Journal to be distributed at such banquet. This refusal was based solely on Plaintiff's Israeli citizenship and national origin.

NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

- 3. It should be emphasized that this action does not challenge the Defendants' right to criticize Israel; to hold anti-Israel or anti-Semitic views; or to advocate for policies based on such views.
- 4. Instead, this action challenges the Defendants' unlawful public accommodation discrimination regardless of the political position which underlies such discrimination.

II. Parties

- 5. Plaintiff Bibliotechnical Athenaeum ("Plaintiff" or "Bibliotechnical") is an Israeli organization with places of business in New York, New York and Elazar, Gush Etzion, Israel.
- 6. Defendants National Lawyers Guild, Inc. and The National Lawyers Guild Foundation, Inc. (collectively, the "Guild") are New York not-for-profit corporations with principle places of business in the State of New York, County of New York.

III. Venue and Jurisdiction

- 7. Venue in the County of New York is appropriate in that the Guild is located in the County of New York.
- 8. Subject matter jurisdiction over this action exists in that the Supreme Court of the State of New York has general jurisdiction. Further, Plaintiff is seeking injunctive relief against the Defendants.
- 9. Personal jurisdiction exists in that this matter arises out of the Defendants' activities in the State of New York, specifically the providing of public accommodation and unlawfully denying such accommodation to the Plaintiff.

V. Background

10. The Guild regularly holds conferences and events, both inside and outside of New York. These events are open to the public and food, drink, and lodging are typically offered to participants.

INDEX NO EX 693668/2016 RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

- 11. In August 2016, the Guild held a "Law for the People" convention in Manhattan (the "Convention").
- 12. In connection with the Convention, the Guild offered to the public the opportunity to purchase advertising in its "dinner journal" to be distributed at its annual banquet.
- 13. More specifically, the Guild posted the following message on its web site:

 Show your support for the NLG with an ad in our annual Dinner Journal!

 Distributed at the Banquet of the #Law4thePeople Convention, placing an ad in the journal is a great way to congratulate our outstanding honorees, publicize your firm or organization, or just share a message of your own!
- 14. In response to this message, on or about June 26, 2016, Bibliotechnical submitted the following advertisement to be included in the dinner journal:



- 15. This advertisement is typical of advertisements which are accepted and included in the dinner journal by the Guild.
- 16. On June 27, 2016, Bibliotechnical duly paid the \$200 fee for publication of this advertisement.
- 17. On the same day, the Guild rejected the advertisement, advising Bibliotechnical that it would not accept monies from an Israeli organization. The next day, the \$200 was refunded.
- 18. Subsequently, the Guild published its annual dinner journal, a copy of which is attached hereto and incorporated herein by reference.

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

INDEX NO. 653668/2016

NYSCEF DOC. NO. Ø5 RECEIVED NYSCEF: 09/26/2018

19. The dinner journal contained no advertisement from the Plaintiff even though it contained many, similar ads from non-Israeli organizations.

VI. Causes of Action and Demand for Relief

First Cause of Action: Violation of

New York City Human Rights Law § 8-107(4)(1)

- 20. The preceding paragraphs are incorporated as if restated herein.
- 21. Bibliotechnical is a "person" within the meaning of the New York City Human Rights Law in that it is an organization and the New York City Human Rights Law defines a "person" as including "one or more, natural persons, proprietorships partnerships, associations, group associations, organizations, governmental bodies or agencies, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers." New York City Human Rights Law § 8-102.
- 22. Further, Bibliotechnical is of Israeli citizenship and national origin. This is clear without even looking beyond the Hebrew in its founding documents, but the courts have held that corporations can even have a racial identity for purposes of anti-discrimination claims. *See, e.g., Hudson Valley Theater Inc. v. Heimbach*, 671 F.2d 702 (2d. Cir. 1982).
- 23. The Guild is and/or regularly operates a place or provider of public accommodation in that it provides "goods, services, facilities, accommodations, advantages or privileges of any kind" within the meaning of New York City Human Rights Law Section 8-102(9). More specifically, the Guild holds an annual banquet and offers advertising to the public in connection with such banquet.
- 24. The Guild violated the New York City Human Rights Law by denying Bibliotechnical, because of its citizenship and national origin, the full and equal enjoyment, on equal terms and conditions, of the accommodations, advantages, services,

08/16/2018 COUNTY CLERK PM INDEX NO. 653668/2016

NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

facilities or privileges of the place or provider of public accommodation. New York City Human Rights Law § 8-107(4)(1)(a).

Second Cause of Action: Violation of

New York City Human Rights Law § 8-107(4)(2)

- 25. The preceding paragraphs are incorporated as if restated herein.
- 26. The Guild violated the New York City Human Rights Law by making a declaration to Bibliotechnical that full and equal enjoyment, on equal terms and conditions, of the accommodations, advantages, facilities and privileges of the place or provider of public accommodation would be denied to Bibliotechnical because of its citizenship and national origin. New York City Human Rights Law § 8-107(4)(2)(a).

Third Cause of Action: Violation of New York City Human Rights Law § 8-107(18)

- 27. The preceding paragraphs are incorporated as if restated herein.
- 28. The Guild violated the New York City Human Rights Law by discriminating against, boycotting, or refusing to sell to Bibliotechnical because of its citizenship and national origin. New York City Human Rights Law § 8-107(18).

Fourth Cause of Action: Violation of

New York State Human Rights Law § 296

- 29. The preceding paragraphs are incorporated as if restated herein.
- 30. Bibliotechnical is a "person" within the meaning of the New York State Human Rights Law in that the New York State Human Rights Law defines a "person" as including "one or more individuals, partnerships, associations, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers." New York Executive Law § 292(1).
- 31. Further, Bibliotechnical is of Israeli national origin. This is clear without even looking beyond the Hebrew in its founding documents, but the Courts have held that

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

INDEX NO. 653668/2016

NYSCEF DOC. NO. 05 RECEIVED NYSCEF: 09/26/2018

corporations can have even a racial identity for purposes of anti-discrimination claims. *See, e.g., Hudson Valley Theater Inc. v. Heimbach*, 671 F.2d 702 (2d. Cir. 1982).

- 32. Further, the Guild regularly operates places of public accommodation, resort, or amusement in that it puts on conferences which take place in the public areas of structures and in which food and lodging is offered. Indeed, this action arises from a banquet to be held in New York in August of 2016.
- 33. The Guild violated the New York State Human Rights Law by denying Bibliotechnical, because of its national origin, the accommodations, advantages, facilities or privileges of the Guild's event. New York Executive Law § 296(2).

Fifth Cause of Action: Violation of

New York State Human Rights Law § 296(13)

- 34. The preceding paragraphs are incorporated as if restated herein.
- 35. The Guild violated the New York State Human Rights Law by boycotting, blacklisting, or refusing to sell to Bibliotechnical because of its national origin. New York Executive Law § 296(13).

[continued on next page]

INDEX NO EX 693668/2016

RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

WHEREFORE, Plaintiff demands judgment against the Defendants for (1) an appropriate amount of compensatory and punitive damages not to exceed \$100,000; (2) an injunction ordering the Defendants to cease engaging in discriminatory conduct; (3) costs, interest, and reasonable attorney's fees; and (4) such other and further relief as the Court deems just.

Respectfully submitted,

The Lawfare Project

Benjamin Ryberg

633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995

Dated: September 24, 2017

Brooklyn, NY



NLG #Law4thePeople Convention

August 2016
New York City
NYU School of Law



FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM INDEX NO. 653668/2016

RECEIVED NYSCEF: 08/26/2018

NYSCEF DOC. NO. 05

Cover: Guild contingent at disarmament rally, New York City, 1982. From left: Teddi Smokler, Stanley Faulkner, Ned Smokler, Peter Weiss, Deborah Rand, Harry Rand, Victor Rabinowitz, Gordon Johnson, unidentified. Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.

Layout and Design by Tasha Moro

NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

Welcome to New York!

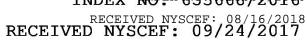
Dear fellow Guild members, supporters, and allies:

On behalf of the New York City Chapter, welcome to the NLG's Annual Banquet. Each year convention participants pause for an evening of celebration, to savor reflection with like-minded legal activists and recommit to the work of justice.

We hope you have enjoyed convening on campus, which was once the traditional format for NLG conventions, and that you have found the facilities amenable to productive work. Please join us in heartfelt thanks to New York University School of Law's Public Interest Law Center (PILC) for co-hosting the Convention, including Dean Trevor Morrison, Assistant Dean for Public Service Lisa Hoyes, Prof. Helen Hershkoff, NYU Law's Events Coordinator Josie Haas, Alesha Gooden, Nikita Chardhry, Ashley Martin, and Jerry Roman of NYU's Office of Housing Services. A special salute goes to Lisa Borge, Programs Manager of the NYU Law Public Interest Law Center.

The New York City Chapter has been fortunate to have generations of members who have worked in support of movements for social justice. They have founded projects that have gone on to become national programs or nonprofit organizations, and started law collectives, movement offices, and public interest law firms. They've been voices for the recognition of legal workers and mentors to generations of students. Some have been impactful judges. But our work has always benefited from our connection to our national organization, making us stronger and more effective.

Which brings us to our gathering this evening. The Annual Banquet, in addition to being a pause to celebrate and socialize, is above all the national organization's annual fundraising event. The NLG has not followed the trend of having high-ticket galas or events exclusively for major donors, so our annual gathering remains inclusive and affordable. That means the success of the national organization's sole fundraiser depends on us all stepping up to do our part. This year, we meet days after two national political conventions where the NLG was instrumental in defending the right of people's movements NOT to remain silent. Last month, the NLG was everywhere that people raised their voices against racist police killings. The importance of a national organization like ours is vital in these times.





Guild members demonstrating at the New York Federal Building in NYCagainst U.S. aid to the Nicaragua Contras, 1984. (Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.)

Last year our wonderful member, Allan Botshon, made a transformative bequest to the NYC Chapter (stewarded by his friend and Chapter Director, Susan Howard). Our chapter shared a substantial part of Mr. Botshon's gift with the national organization which helped resolve

immediate financial challenges. The national organization now needs to build capacity to grow and meet the challenges of these perilous high-stakes times. If everyone tonight makes a pledge to the NLG Foundation, it will show immediate returns, helping the national organization progress and build capacity. Please consider making a pledge at tonight's banquet!

The New York City Chapter has been honored to host this year's Law for the People Convention, and we look forward to passing the baton to our sister chapter in Washington, D.C., host for the NLG's 80th Anniversary Convention next year. Thanks to the convention planning committee and volunteers for working to make this Convention a success. Two individual thanks are in order: Chapter Executive Director Susan Howard masterfully coordinated the many components of making the NLG's first on-campus national meeting in decades work, and former chapter president and National Office collective member Franklin Siegel secured the event venue and lodging facilities, as he did for the NLG's last summer convention 23 years ago. We thank the National Office staff—King Downing, Lisa Drapkin, Pooja Gehi, Daniel McGee, Tasha Moro, and Traci Yoder—for a truly enjoyable collaboration. We also thank NLG president Natasha Bannan for asking the NYC chapter to consider hosting the Convention.

Finally, please join in a rousing cheer for a comrade and NLG leader who inspired us all: MICHAEL RATNER PRESENTE!

In solidarity,

Carl Lipscombe, President and Susan Howard, Executive Director on behalf of the NYC-NLG Chapter

NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

Program

Friday, August 5, 2016

7 PM-10 PM

7:30 PM	Welcome by Pooja Gehi & Natasha Lycia Ora Bannan
7:45 PM	Presentation of C.B. King Award to Emily Bock
7:55 PM	Presentation of Legal Worker Award to Noelle Hanrahan
8:05 PM	Remarks by Barbara Dudley and Carl Lipscome
8:15 PM	Presentation of Ernie Goodman Award to Michael Deutsch
8:25 PM	Presentation of Law for the People Award to Soffiyah Elijah
8:40 PM	Invite Attendees to Microphone
9:30 PM	Program Concludes

Law for the People Award Soffiyah Elijah

offiyah Elijah is the Executive Director of the Correctional Association of New York and member of the NLG-NYC Chapter.

An accomplished advocate, attorney, scholar and educator, Ms. Elijah is the first woman and the first person of color to lead the nearly 170-year old organization in its mission to create a fairer, more effective, and humane criminal justice system. Prior to joining the staff of the Correctional Association in March 2011, Ms. Elijah served as Deputy Director and a clinical instructor at the Criminal Justice Institute at



Harvard Law School. At the Institute, she trained hundreds of law students to become effective and ethical lawyers and to engage in local and national reform of criminal and juvenile justice policies.

A native New Yorker, Ms. Elijah practiced criminal and family law in New York City for more than 20 years. Before moving to Harvard, she was a member of the faculty and Director and supervising attorney of the Defender Clinic at the City University of New York School of Law. She was a supervising attorney at the Neighborhood Defender Service of Harlem, where she defended indigent members of the Harlem community, and has also worked as a staff attorney for the Juvenile Rights Division of the Legal Aid Society.

Honored by the Massachusetts Chapter of the NLG in 2010 and the NLG-NYC Chapter in 2015, Ms. Elijah has dedicated her life to human rights and social activism. She is a recognized national and international authority on human rights issues and has served as a justice on several people's tribunals focused on the U.S. government's response to Hurricane Katrina, the testing of bombs in Vieques, Puerto Rico, and conditions of confinement inside American prisons. She has authored several articles and publications on U.S. criminal and juvenile justice policy and prison conditions and is a frequent presenter at national and international forums.

Ms. Elijah earned her Bachelor of Arts from Cornell University and Juris Doctorate from Wayne State University Law School.

Each year the National Lawyers Guild gives the Law for the People Award to an individual whose work embodies the values that our membership holds dear. Previous recipients include Walter Riley, Standish Willis, Jan Susler, Judith Berkan, and Jim Lafferty.

Ernie Goodman Award

Michael Deutsch

with the People's Law Office and a Guild member since 1970. From 1991-1996, he was the Legal Director of the Center for Constitutional Rights. Mr. Deutsch's legal career has been devoted to the representation of political activists and political prisoners. He was one of the criminal defense lawyers for the rebelling Attica prisoners, a coordinator of the Attica Brothers Legal Defense, and one of the class counsel in the Attica civil suit which, after two decades of litigation, resulted in a 12 million dollar settlement.



He was attorney for the five Puerto Rican Nationalist prisoners imprisoned in the 1950s who won an unconditional sentence commutation from President Carter in 1979, and represented Puerto Rican independentistas in Chicago, New York, and Hartford who were charged with seditious conspiracy, the Wells Fargo expropriation, and subpoenaed before federal grand juries. He also helped to develop the "Prisoner of War" claim under international law for Puerto Rican prisoners.

He has defended Black Panthers, Black prisoners facing the death penalty, and was part of the legal team that challenged the first use of the high security "control units" for men at Marion Federal Prison and for women at Lexington Federal Prison.

More recently, Michael successfully defended Chicago Palestinian community activist Muhammad Salah charged with Terrorism and RICO as well as Palestinian community organizers targeted by the FBI and subpoenaed to a federal grand jury.

Presently, Mr. Deutsch represents Rasmea Odeh, the deputy director of the Arab-American Action Network (AANN), a former Palestinian political prisoner and torture survivor, who has been charged with providing false information on her naturalization application, nine years after she received her citizenship. After her conviction in federal court in Detroit, her case was remanded by the Sixth Circuit to reconsider the exclusion of her PTSD expert.

Mr. Deutsch has written and lectured extensively on prisons, international human rights, and political repression.

Ernest "Ernie" Goodman (1906-1997) of Detroit was a founding member of the National Lawyers Guild and an influential civil rights and First Amendment lawyer. Each year the Ernie Goodman Award is awarded to a Guild lawyer who, within the past several years or currently, is engaged in legal struggle against financial, political, or social odds to obtain justice on behalf of those who are poor, powerless, or persecuted. The Goodman Award is given by the National Lawyers Guild Foundation.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

C.B. King Award **Emily Bock**

Presser Social Justice Fellow and Beasley Scholar at the Temple University James E. Beasley School of Law in Philadelphia, PA. She has also been awarded the Honorable Dolores Sloviter Public Interest Fellowship, the Henry Maxmin Scholarship, and a SPIN Public Interest Honors Grant. She graduated with her B.A. in English Literature and a concentration in Gender and Sexuality Studies from Haverford College in 2011.



Prior to law school, Ms. Bock was

a Haverford House Fellow and worked at Community Legal Services of Philadelphia and at the National Clearinghouse for the Defense of Battered Women. She also volunteered with the Pardon Me Clinic of X-Offenders for Community Empowerment (XCE), the Criminal Records Expungement Project of the Philadelphia Lawyers for Social Equity (PLSE), and the Restorative Justice Project at SCI-Graterford.

As a law student, she has worked with Community Legal Services of Philadelphia, Women Against Abuse, the New Jersey Office of the Public Defender, the Temple Legal Aid Office, the Sheller Center for Social Justice, and the Defender Association of Philadelphia. She was the 2014-2015 co-chair of the Temple Law National Lawyers Guild Chapter, and is a co-founder of the Temple National Lawyers Guild Expungement Project. After law school, Ms. Bock will clerk for one year in the Superior Court of New Jersey – Criminal Division. She hopes to pursue a career as a public defender or to work more broadly with people who are formerly incarcerated/those with past criminal legal involvement.

C. B. King (Chevene Bowers King, 1923-1988) was one of the country's most prominent and courageous civil rights lawyers. For over 30 years, he practiced law in Albany, Georgia, where he was a major figure in the civil rights movement. He was well-known for his courage, courtroom eloquence, and legal skills in the face of tremendous adversity and sometimes even violent opposition during the civil rights movement in Georgia. C.B. King was also a great teacher. In his office, on the streets, and in the courtroom, he taught several generations of law students and young lawyers how to practice law with a commitment to the poor, the disenfranchised, and the oppressed. A great many students underwent life-changing experiences under his tutelage.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Legal Worker Award

Noelle Hanrahan

oelle Hanrahan, is a private investigator, investigative iournalist and Director of Prison Radio, as well as a member of the Guild's San Francisco Bay Area Chapter, and in years past, the Philadelphia Chapter. Since 1992, she has produced over 3,000 of Mumia Abu-Jamal's radio essays and brought his first book out of prison, Live From Death Row (Harper Perennial). She edited All Things Censored (Seven Stories Press, 2002), and with Stephen Vittoria, she produced the acclaimed theatrically distributed feature documentary



Mumia: Long Distance Revolutionary (Street Legal Film 2013).

Noelle is a graduate of Stanford University with a B.A. in Gender, Race, and Class Studies, as well as Boston University with a M.A. in Criminal Justice. She is board President of the Redwood Justice Fund and a board member and past board president of the Quixote Center. Global Audio Forensic Investigations is her investigation firm. She is currently working on *Abu-Jamal v. Kerestes*, which is on the front line of bringing lifesaving medical care to Pennsylvania inmates, and *Hanrahan v. Mohr* which is advocating for the First Amendment rights of the Lucasville 7+ on Ohio's death row.

Prison Radio challenges unjust, racist and sexist police and prosecutorial practices that result in mass incarceration and the literal disenfranchisement of huge segments of our population. Since 1990, Prison Radio has been at the forefront of the movement challenging mass incarceration. The prisoners we work with have complete editorial freedom. Prison Radio seeks to amplify their uncensored voices. Prison Radio contributes these voices to documentaries, features, and movies and makes them available on our website and via subscriber newsletters. We broadcast on over 1,200 radio stations and reach millions of listeners and viewers. Prison Radio is celebrating its 25th Anniversary in 2016 and is a project of the Redwood Justice Fund, founded by Judi Bari and Tanya Brannan, Esq.

The annual NLG Legal Worker Award is given to a Guild member whose legal support work has demonstrated leadership in the organization, marked by one or more notable accomplishments, and recognized by their peers.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Debra Evenson Venceremos International Award **Audrey Bomse**

udrey Bomse has been a lawyer since 1980 and an activist basically all her life. She practiced criminal law in the U.S. for many years as a Public Defender and later civil rights law, representing the interests of the class of state and county inmates at the New Jersey Office of Inmate Advocacy.

In 2001, Audrey moved to Palestine to work as a Human Rights lawyer for seven years, largely focusing on the issue of Palestinian political prisoners. Her last position was legal director of the United Against Torture Coalition,



comprised of twelve NGOs working to prevent and combat torture. In that capacity she presented the coalition's "Alternative Report on Israel" to the UN Committee Against Torture in Geneva.

Audrey was a passenger on the second voyage of the Free Gaza Movement (FGM) in November 2008 and was subsequently detained for 4 days upon her return to Israel and was eventually deported. She then moved to London where she worked on legal issues involving the Israeli naval assault on the subsequent Freedom Flotillas to Gaza and associated issues. She moved to Miami in 2011.

Audrey was a member of the NLG delegation to Tunisia almost immediately after the revolution and, because her daughter and family live in Tunis, she has been there many times since. A particular interest of hers has been the transitional justice process - or lack thereof. Audrey was also a member of the NLG delegation to Egypt and has been actively working to support the Egyptian human rights movements.

Audrey has been an active member of the National Lawyers Guild for 30 years, past co-chair of its Prisoners' Rights Committee and current (long-standing) co-chair of its Palestine Subcommittee.

Former Guild President Debra Evenson (1942-2011) was one of the visionary architects of Cuba's legal system, and a staunch defender of the country at home. The award is presented by the International Committee in recognition of brave work to extend justice beyond borders.

The 2016 Debra Evenson Venceremos International Award was presented at the joint International Committee and Labor and Employment Committee Reception.

NYSCEF DOC. NO. 25 RECEIVED NYSCEF: 09/26/2018

Carol Weiss King Award Javier Maldonado

private practice best known for his groundbreaking work at the intersection of immigration and criminal law. He is responsible for establishing a wide range of precedent in the Fifth Circuit limiting the reach of the aggravated felony provision of the INA including *Kern v. Holder* (Florida false imprisonment is not an aggravated felony), *Paez Sarmientos v. Holder* (Florida sale of a controlled substance is not a drug trafficking offense), *Davila v. Holder* (New York sale of a controlled substance is not



an aggravated felony), and *Serna Guerra v. Mukasey* (Texas unauthorized driving of a vehicle is not an aggravated felony).

He regularly presents at state and national conferences on civil rights and immigration law and advises attorneys litigating cases in those areas. Maldonado is the previous Executive Director of the Texas Lawyers' Committee where he conducted impact litigation in the area of immigrants' rights. At the Lawyers Committee, Maldonado secured victories in *Martinez* Aguero v. Gonzalez, in which the Fifth Circuit affirmed that noncitizens stopped at the border are protected by the Fourth Amendment, and Ramirez Molina v. Ziglar, in which the Fifth Circuit held for the first time that noncitizens previously deported have the constitutional right to challenge their prior removal order. Prior to the Lawyers Committee, Maldonado served as a trial attorney at the Equal Employment Opportunity Commission where he litigated employment discrimination cases. Maldonado also served for three years as a staff attorney with the Mexican American Legal Defense and Educational Fund (MALDEF). He was born in Matamoros, Mexico and immigrated to the United States in 1974. Maldonado earned his B.A. and J.D. at Columbia University. Following law school, he clerked for U.S. District Court Judge George P. Kazen in Laredo, Texas. Today, Maldonado lives and works in San Antonio, Texas.

The National Immigration Project of the National Lawyers Guild awards the Carol Weiss King Award annually for excellence in the pursuit of social justice through organizing, litigating, and teaching. The award has honored dozens of individuals whose work has significantly advanced human and civil rights for all. Prominent U.S. lawyer Carol Weiss King (1895-1952) specialized in immigration law and the defense of the civil rights of immigrants, and was a founding member of the National Lawyers Guild.

The 2016 Carol Weiss King Award was presented at the Keynote Address.

NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 09/26/2018

Arthur Kinoy Award Albert Woodfox

Louisiana, one of six children raised by a single mother. By the time he was a young adult, he had succumbed to the lure of the streets and found himself behind bars in a state that now has the distinction of being the forerunner when it comes to mass incarceration. His encounters with the law landed him in the notoriously dangerous Louisiana State Penitentiary (known as "Angola").



By 1977, two courts had concluded that state and federal constitutional violations

were rampant in the facility, one noting that conditions at Angola "shock the conscience of any right thinking person." In the 1960s and 1970s, Angola was segregated. By the early 1970s, Angola did not even have African American employees. In this volatile climate, Albert Woodfox and the late Herman Wallace courageously founded a prison chapter of the Black Panther Party. Robert King later joined them in their campaign for fair treatment and better conditions for inmates, racial solidarity between black and white inmates, and an end to the rape and sexual slavery that was then endemic in the prison. In an effort to quell their organizing, they were framed for murders and placed in solitary confinement, known as "Closed Innocence" and mounted their own defense for over twenty years until a local support group was formed and legal representation followed. Thereafter, their support expanded to a national and then an international coalition. What was initially a case soon became a campaign and then a movement.

The movement seeks to disrupt unjust and inhumane practices wherever they exist. After emerging from 43 horrific years in solitary confinement, Albert joined the effort that he inspired. When asked to explain how it is that he defied so many odds, Albert says: "If a cause is noble, you can carry the weight of the world on your shoulders." Albert spends his days making presentations, advocating for policy changes and legal reforms, and enjoying the company of his daughter, grandchildren, great-grandchildren, the Angola 3 support team, and his immense conglomerate of family, friends, and associates.

Albert is a victim of racism, abuses of power, prosecutorial misconduct, instances of judicial indifference, and official corruption, but he chooses his legacy to be that of an overcomer.

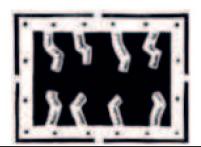
The Arthur Kinoy Award was established in 2008 as an occasional award given in the spirit of beloved member Arthur Kinoy. The inaugural recipient was former Jailhouse Lawyer VP Paul Wright. While there are no formal guidelines for the award, on special occasions it may be given to those individuals whose work and passion would have especially appealed to Arthur.

The 2016 Arthur Kinoy Award was presented at the Keynote Address.

INDEX NOEX 693668/202166 RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

Honoring Albert Woodfox Frederick Douglass was right:

"Find out just what any people will quietly submit to and you have found out the exact measure of injustice and wrong which will be imposed upon them."



You never stopped fighting; we are all stronger thanks to you.

Deborah & Henry Willis

So proud of all the honorees!

You Always Stand for Justice No Matter What!

> Bill Quigley New Orleans

VAN DER HOUT, BRIGAGLIANO & NIGHTINGALE, LLP

SPECIALIZING IN ALL ASPECTS OF IMMIGRATION AND NATIONALITY LAW

Congratulations Michael, Javier, Audrey, and all the other honorees for your

dedicated work promoting and defending the civil rights of all!

MARC VAN DER HOUT | ZACHARY NIGHTINGALE | STACEY GARTLAND CHRISTINE BRIGAGIIANO, OF COUNSEL | KATHERINE M. LEWIS | VALERIE ANNE ZURIN | JENNIE C. LIU AMALIA WILLE | GENNA BEIER | ALISA WHITTIELD | MEGAN SALLOMI | BETH COHN-MINTZ

SAN FRANCISCO

VBLAW.COM

ΡΑΙΟ ΛΙΤΟ

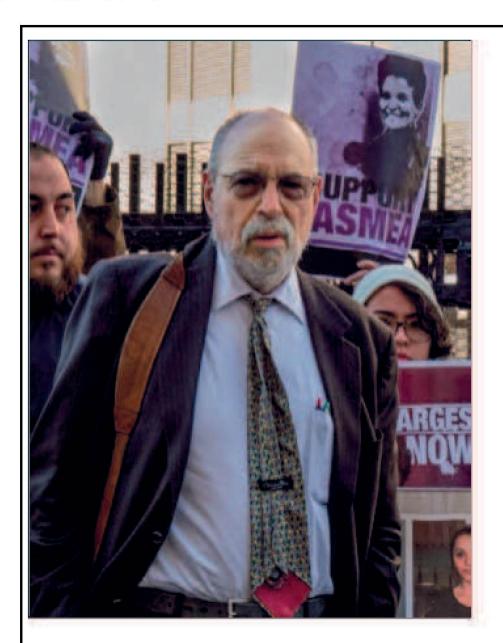


99 Hudson Street, 12 FL, New York, NY 10013 T: 212.966.5932 www.aaldef.org FB: bit.ly/aaldef Twitter: @aaldef

Congratulations to Michael Deutsch on his hard earned and well deserved award in recognition of his tireless efforts as a true lawyer for the people.

> Peter Schmiedel and Susan Mitchell

RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017



Congratulations to the Remarkable

Michael Deutsch

Our comrade, friend, mentor, and most worthy recipient of this year's Ernie Goodman Award!

Fighting for the Attica brothers, the self-determination of the Puerto Rican and Palestinian Peoples and their political prisoners, the targets of Grand Jury abuse, and many other freedom fighters and targets of racist and political repression for 46 years. You are, and always have been, a wise leader, a lawyers' lawyer, an activist's activist, and a brilliant political and legal strategist.

Congratulations to Soffiyah Elijah and all 2016 NLG Award winners

Freedom for Rasmea! Free Oscar López Rivera! **Black Lives Matter!** Reparations Won!

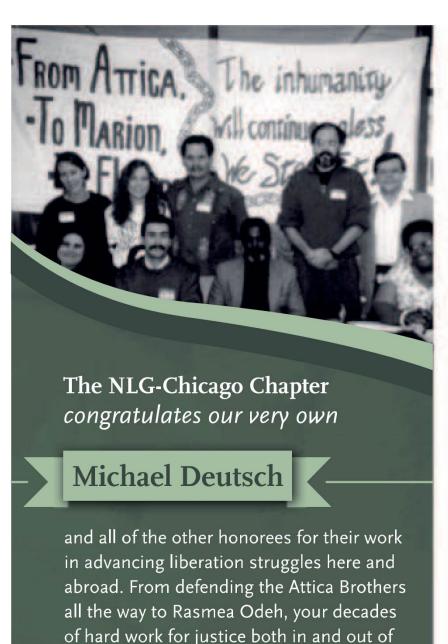
La Lucha Continua! The People's Law Office Family

Alexis, Ben, Brad, Flint, Kris, Jan, Jani, John, Joey, Lourdes, Sarah, Shubra, Dennis, Jeff & Pat

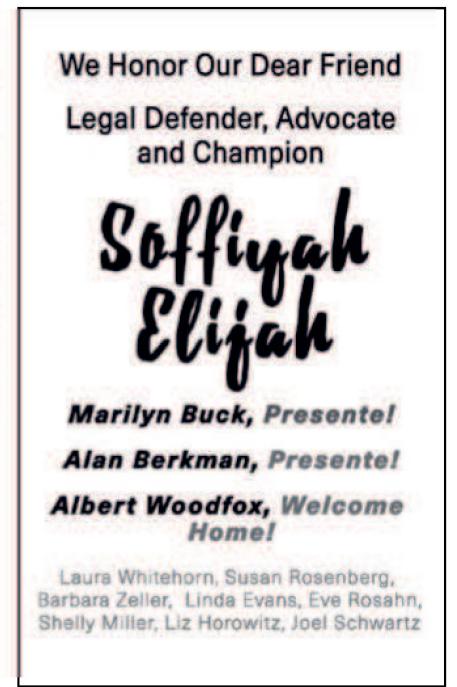


RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

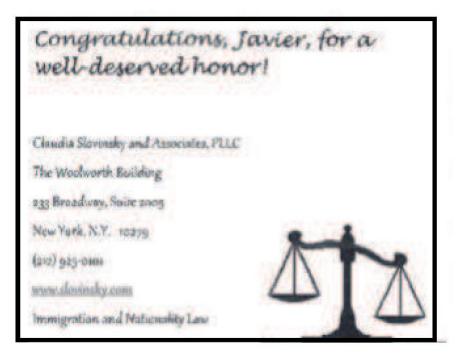


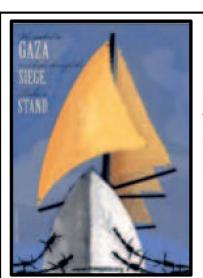
the courts are an inspiration!



I AM BOTH
HONORED &
HUMBLED TO BE
AMONG SUCH
DISTINGUISHED
RADICAL LEGAL
AND POLITICAL
ACTIVISTS!

- AUDREY





Congratulations, Audrey, for this well-deserved award. We are proud to know and work with you.

The Free Gaza Movement Board

CONGRATULATIONS TO ALL THE HONOREES, ESPECIALLY FOR MY GOOD FRIEND MICHAEL DEUTSCH.

JIM FENNERTY

Javier

When you smile, the whole world smiles with you!

Congratulations on this muchdeserved recognition!

Trina and Mary



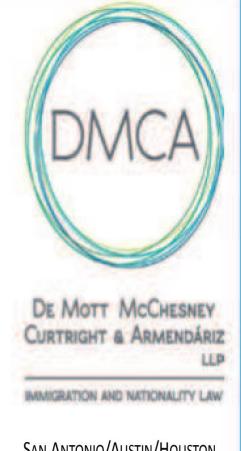
Congratulations to our friend and esteemed colleague Javier Maldonado on receiving the Carol Weiss King Award!



Your relentless pursuit of social justice through litigation and education has made a significant impact in our field and has inspired many.

Congratulations to all the NLG honorees!

- De Mott, McChesney, Curtright & Armendáriz, LLP



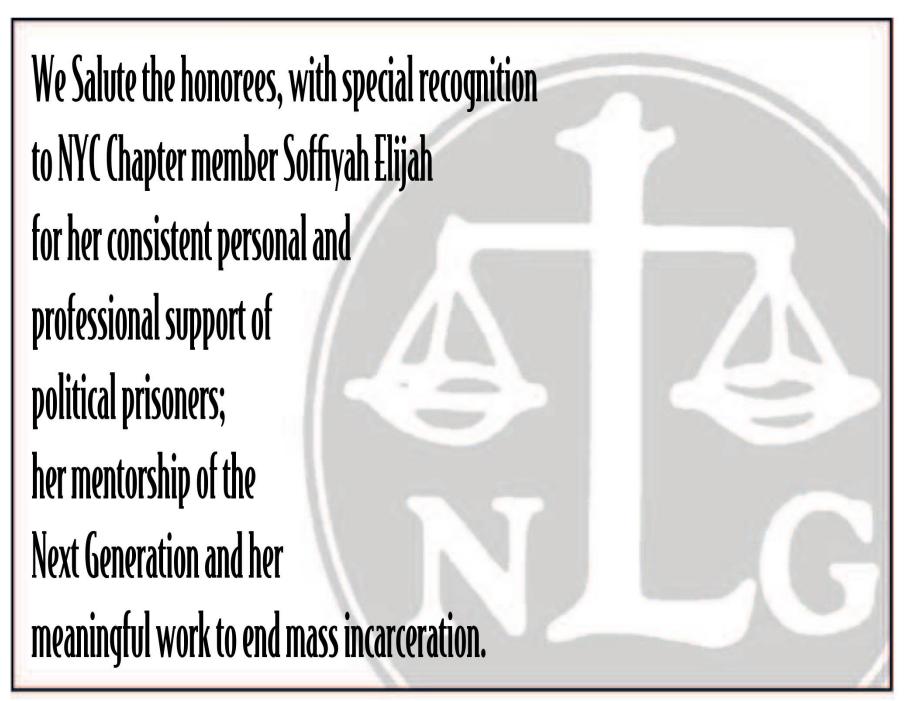
SAN ANTONIO/AUSTIN/HOUSTON **TEXAS**

WWW.DMCAUSA.COM

DMCA: BUILDING COMMUNITY, ONE PERSON, ONE FAMILY, ONE BUSINESS AT A TIME.

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25



THE PHILADELPHIA CHAPTER

OFTHE NLG

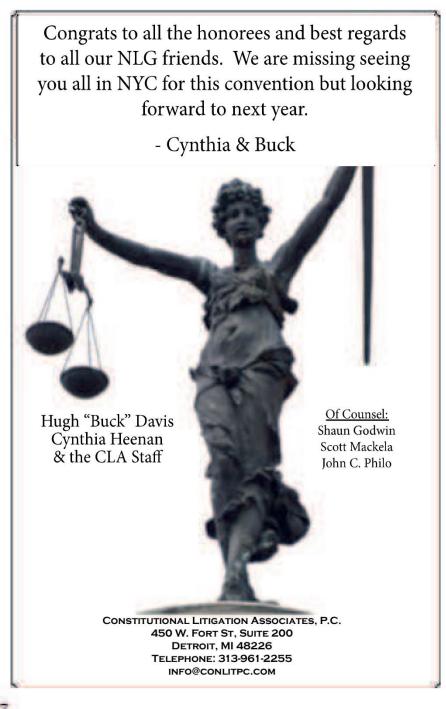
CONGRATULATES

EMILY BOCK

ONE OF PHILLY'S BEST AND BRIGHTEST

> ON THE C.B. KING AWARD





RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017 NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

SEGAL & GREENBERG LLP

Salutes

Audrey Bomse, Soffiyah Elijah, Albert Woodfox, Javier Maldonado, Emily Bock, Michael Deutsch, and Noelle Hanrahan

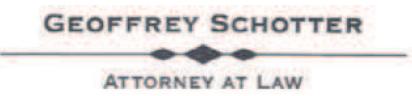
> For Their **Advocacy and Vision**

Philip C. Segal Margery A. Greenberg

William R. Dalsimer Louise Gruner Gans Cindy S. Singh Stephen M. Latimer

179 Franklin Street New York, New York 10013 (212) 297-0503 www.segal-greenberg.com

Congratulations to all of tonight's outstanding Honorees



WORKERS' COMPENSATION ● SOCIAL SECURITY DISABILITY EMPLOYMENT DISCRIMINATION • CIVIL RIGHTS

65 LENOX ROAD #1E ● BROOKLYN, NY 11226 (347) 413-9014 GEOFFREY.SCHOTTER@GMAIL.COM

WWW.SCHOTTERLAW.COM

Congratulations to all the NLG awardees. You are awesome.

INDEX NO EX 693668/2016

Walter Riley, Law Office 1440 Broadway, Suite 612A Oakland, ČA 94612 **(510)** ■ walterriley@rrrandw.com

CONGRATULATIONS TO THE 2016 NATIONAL LAWYERS **GUILD HONOREES**

-Joseph Lipofsky

YSCEF DOC. NO. Ø5 RECEIVED NYSCEF: 08/26/2018

Felicitaciones Javier

Es un orgullo para nosotros conocerte y trabajar contigo.

Your patience, guidance and wisdom are unparalleled. Your remarkable work has advanced the rights of all immigrants. We admire that you never back down from a tough case and that you're always willing to push the envelope.

From Deep in the Heart of Texas

Carlos Garcia Garcia and Garcia, McAllen, Texas

Denise Gilman, Austin, Texas

Barbara Hines, Austin, Texas

Ranjana Natarajan, Austin, Texas

Erica Schommer, San Antonio, Texas

Stephanie Taylor, Hansen and Taylor, Austin, Texas

Lee Teran, San Antonio, Texas

Frances Valdez, FValdezLaw, Houston, Texas

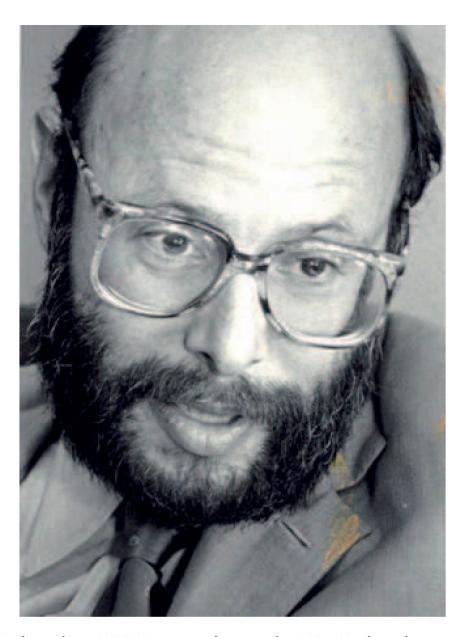
Jennifer Walker Gates, Chito Vela and Susannah Volpe Walker Gates Vela, Austin, Texas

> Kate Lincoln-Goldfinch Lincoln Goldfinch Law, Austin, Texas

INDEX NO.EX 693668/20216 RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

HONORING MICHAEL RATNER

Michael Ratner was truly a revolutionary lawyer. He embodied the spirit of the National Lawyers Guild's founders who believed that the law could and must be used to protect those dissidents and revolutionaries who were most despised and persecuted by reactionary and anti-democratic governments around the world, especially our own.



Michael speaking at 1987 press conference about Ben Linder, who was tortured and murdered by the US-backed Contras while he was helping to build a hydroelectric plant in Nicaragua. Michael and CCR represented Ben's family, seeking redress against Contra leaders and the US government.

Because of Michael's leadership of the Guild and the Center for Constitutional Rights, US imperialism was exposed and undermined, and an anti-imperialist movement gained strength and legitimacy.

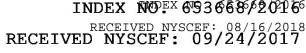
Michael's leadership, legal acumen and personal courage provided inspiration for generations of Guild lawyers and law students. He leavened his brilliant mind and creative legal skills with love and humor, and an abundant energy. His work, his laugh, his irony and his enduring belief in the revolutionary spirit of the oppressed will live on.

NYSCEF DOC. NO. 05 RECEIVED NYSCEF: 09/26/2018

The Presidents of the Guild are gratified to know that Michael's spirit and inspiration are embodied in this year's honorees.

MICHAEL RATNER, PRESENTE!

Michael Avery Natasha Lycia Ora Bannan John Brittain Marjorie Cohn Barbara Dudley Peter Erlinder David Gespass Bill Goodman Paul Harris Karen Jo Koonan Jim Larson **Bruce Nestor** Azadeh Shahshahani Marc Van Der Hout **Doron Weinberg**





AAAN salutes NLG and the venerable Michael Deutsch for their incredible work defending the rights of Palestinians in Chicago!

If we see only the worst, it destroys our capacity to do something. If we remember those times and places-and there are so many-where people have behaved magnificently, this gives us the energy to act, and at least the possibility of sending this spinning top of a world in a different direction. And if we do act, in however small a way, we don't have to wait for some grand utopian future. The future is an infinite succession of presents, and to live now as we think human beings should live, in defiance of all that is bad around us, is itself a marvelous victory. - Howard Zinn

To Michael Deutsch

Justice is a constant struggle thanks for your constancy Congratulations on a well deserved award.

Susan Kaplan & Len Cavise

Conrad Johnson, Brenda Eberhart, Brian Donnelly and Mary Zulack unite in praising Our hero, the one and only Javier Maldonado During student days at Columbia Law School we saw your determination to right all wrongs. We knew you would change the world in important and positive ways- To you, and equally to your wife and children, we say: CONGRATULATIONS

WILLIAM ROTHBERG

LAW OFFICES OF WILLIAM ROTHBERG

16 COURT STREET BROOKLYN, NEW YORK 1124L (718) 624-2200

BILL & ELLEN

¡PRESENTE!

In the 1970's the Guild was getting its Military Law Project in Southeast Asia (now called the Military Law Task Force) started while the war in Vietnam was winding down. A couple, Bill Schaap and Ellen Ray, volunteered to go to Okinawa to start and steer the Project's operation there. They organized and administered superbly. Their legacy lives. Okinawa was probably our most active outpost. Like other founders of the Military Law Task Force, they stayed close to the peace, justice, and opposition to empire that inspired the founding. In the past year, Ellen died, then Bill did. We owe them much.

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25



Dare to Struggle

Dare to Win!

Lynne Stewart Ralph Poynter CONGRATULATIONS JAVIER,
ON A WELL DESERVED
AWARD!

Hines & Leigh

1005 E. 40th St. Austin, TX 78751 (512) 452-0201 www.hines-leigh.com

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

We Salute AUDREY BOMSE

and her fellow honorees

Audrey is a global people's lawyer whose dedication, innovation and commitment inspires us all to struggle for a world of justice and liberation.

Suzanne Adely Marjorie Cohn Jeff Frank John Fussell Katie Gallagher Steven Goldberg Zaha Hassan Arthur Heitzer Human Rights Defense Center
Kerry McLean
Daniel Meyers
Jeanne Mirer
NLG Cuba Subcommittee
William Quigley
Andrew Reid
Lucy Rodriguez

Ann Schneider
Susan Scott
Newland Smith
Judy Somberg
Uri Strauss
Jan Susler
Paul Wright
Emily Yozell

THANK YOU TO MICHAEL DEUTSCH FOR ALL YOUR WORK!

From Margaret P. Levy, West Hartford, CT The Quixote Center Board and Staff congratulate you, Noelle, our friend and companion in seeking justice.

You are an inspiration.



For Michael Deutsch who richly deserves the Ernie Goodman Award

Marty Stolar & Elsie Chandler

INDEX NO.EX 693668/2016 RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 09/24/2017

CONGRATULATIONS...

...to all 2016 Convention Honorees, including NPAP members Michael Deutsch and Javier Maldonado, for their outstanding contributions to ensuring justice for all.

> National Police Accountability Project 499 7th Ave., New York, NY www.npapjustice.org

Three great reasons for our active, committed support of the **National Lawyers Guild: Audrey Bomse, Michael Deutsch,** Soffiyah Elijah.

> Lucky Us. **Dan Meyers** Joan Max Reinmuth

For their dedication to justice and especially to the freedom for all U.S. political prisoners, I salute Mike, Soffiyah, Audrey and Noelle

Free Palestine!

Bob Boyle

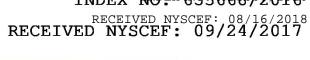
Sincere appreciation to the NLG National Office Staff

Daniel McGee King Downing Lisa Drapkin Tasha Moro Traci Yoder Pooja Gehi

from former NLG National Office Staffs and Collectives

Holly Sullivan Hazleton Carlin Meyer Phyllis Bennis Ian Head Rick Best Jamie Munro Alicia Kaplow Dana Biberman Vernell Pratt Karen Jo Koonan Heidi Boghosian Corinne Rafferty Jeffrey Kupers Kevi Brannelly Franklin Siegel Sylvia Cedillo Wini Leeds Gunnar Sievert Joseph Lipofsky Kenneth Cloke Marina Sitrin Bernadine Dohrn Michel Martinez Hizabeth St. Clair Daniel Mayfield Barbara Dudley Deborah Weimer Carol Grumbach Dale Wiehoff

Michael Ratner presente!





Congratulations to All This Year's Honorees

From

The John Marshall Law School Restorative Justice Project

Bringing Peace and Justice to the Chicago Public Schools

315 South Plymouth Court Chicago, Illinois 60604 312-427-2737 www.jmls.edu

The Rosenberg Fund for Children salutes our friends

> Michael Deutsch Soffiyah Elijah **Noelle Hanrahan** & the other honorees

for their unyielding work for justice



RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017



The Redwood Justice Fund

(founded by Judi Bari & Tanya Brannan, Esq.)

Salutes NLG Legal Worker of the Year 2016 Noelle Hanrahan, P.I.

"Noelle has dedicated her life to helping prisoners speak to the other citizens of this society. She is one of the most effective prison right investigators in the country because she doesn't speak for the prisoners, she makes it possible for us to hear them speak for themselves. I think Noelle deserves this award because she gets work done. And she isn't afraid to win."

Board Vice President Karen Rudolph, Esq.

Bit.ly/PrisonRadio

In Memory of our Friend Michael Ratner

Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C. New York, New York

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

TERRY GILBERT & JACQUELINE GREENE

Extend their congratulations to

Michael Deutsch

as recipient of the Ernie Goodman Award and for all the great work he has done on behalf of political prisoners and oppressed people.

FRIEDMAN & GILBERT

55 Public Square, Suite1055 Cleveland, Ohio 44113 FriedmanAndGilbert.com

The National Lawyers Guild thanks the following supporters

Sheila Dugan
The Jericho Movement for Amnesty and w
Freedom for All Political Prisoners
Carlin Meyer
William "Bill" Montross
Maria Baldini-Potermin
Deborah Rand
Rebecca Shapless

INDEX NO.EX 693668/202166 RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

Congratulations

Soffiyah Elijah

2016 Law for the People Award Honoree We salute you for your steadfast commitment to the human rights and dignity of all incarcerated people, and for having led the CA with honor, courage, and distinction for the past five years.

We love you.

The Correctional Association of New York



Thank you Honorees for your steadfast commitment to Justice.

Thank you NLG for being there for people in struggle.

Holly Maguigan and Abdeen Jabara

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2017
RECEIVED NYSCEF: 09/24/2017

Matt Piers, Kalman Resnick and the law firm of HSPRD congratulate our friend and colleague

Michael Deutsch

for an outstanding career, fighting in the courts for justice and social progress.

70 West Madison Street, Suite 4000, Chicago, IL



NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 09/26/2018

We join the NLG in celebrating Audrey Bomse's lifelong work as a fearless political and social justice activist, as well as a passionate "lawyer for the people". We continue to be inspired by your dedication and commitment to just causes across the globe. You are not only a tireless fighter but also a wonderful, attentive and loving mother, grandmother and friend. Thank you for being who you are.

Venceremos!

Love, Your family and friends

Dan, Corinna, Brahim, Margot, Sydney, Josh, Kacie, Julien, Margarita, Maggie, Susan, Val, Azadeh, Hal, Yonit, Anaheed, Malik, Ann, Ujju, Greta, Sultana, Amaranta, Hilary, Lubna, Mireille, Lillian and Larry

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

Congratulations to the courageous Albert Woodfox, Noelle Hanrahan and all of this year's honorees. Many thanks to the National Lawyers Guild for your tireless work for human rights, civil liberties and social justice.

-People's Rights Fund

So proud of all the honorees!

You Always Stand for Justice No Matter What!

> Bill Quigley New Orleans

Ethel Rosenberg was not a spy and her execution was wrongful

#ExonerateEthel



Sign the petition at rfc.org/ethel calling on President Obama to exonerate Ethel

> Stop by the Rosenberg Fund for Children table or visit rfc.org/ethel to learn more

Congratulations!

Soffiyah Elijah (Law For the People Award) Noelle Hanrahan (Legal Worker of the Year).

"Greetings, my friends at the NLG. On a move. Congratulations to all the honorees at this year's convention. Shout out to Sister Soffiyah Elijah, a freedom fighter in the law. She laughs when I tell her I thought she was a Jewish woman years ago.

What does Noelle Hanrahan bring to the table, besides her relentless energy honed on the basketball courts of Stanford? She brings a vision, actualized in Prison Radio, which performs a unique function. It breaks down walls. It brings the voices of the damned, the imprisoned, the oppressed and the dispossessed to you, to millions in America. That, in a time when presidential candidates clamor to build yet more walls is a prodigious and noble feat in itself that deserves your plaudits and praise.

For as many of you have heard me say a hundred times before, America is the prison house of nations. Anything that pulls bricks out of that monstrosity should be applauded. She is, too, a dogged researcher who, as a licensed private investigator, digs into the detritus of the criminal justice system to uncover evidence of violations of the constitution and laws that judges swear to uphold. For this, too, she deserves your kudos.

Thank you for your time. To all your honorees, congratulations. And Noelle? Nicely done.

> From imprisoned nation, this is Mumia Abu-Jamal. bit.ly/PrisonRadio

Comradely Greetings from the Seattle Chapter Congratulations to all of this year's Honorees

Congratulations to Soffiyah Elijah who is always for the people!

Elizabeth Sackler & the Sackler Center family

The International Committee's Palestine Subcommittee says,

THANK YOU, AUDREY!!

for being the Rock of Gibraltar that we depend upon being there for us, always, to save us from our own gaffs of analysis and judgment; hit the nail on its head every time; send us every newsworthy article, courtesy of the Audrey Bomse Palestine/Israel Clearinghouse; and serve us with such love, humor, and deftly light touch as Mother-Hen-in-Chief, without which there would not be a Palestine Subcommittee.

We love you, we need you, and will you still be there when we're 84?

Congratulations to our dear friend Michael

on this well deserved award! We appreciate and admire your years of selflessly supporting the Attica Brothers, the Black Liberation Movement, the Puerto Rican Independence movement, the struggle of the Palestinian people, and other antiracist and anti-imperialist struggles.



From your Knowledge Group friends in Chicago who rely on your thought provoking and insightful analysis. Erica, Ginger, John, Margaret, Melinda, Susan, and Steve

THE INDIANA CHAPTER OF
THE NATIONAL LAWYERS
GUILD CONGRATULATES
MICHAEL DEUTSCH ON
HIS RECEIPT OF THE ERNIE
GOODMAN AWARD AND
THANKS HIM FOR HIS WORK
ON BEHALF OF POLITICAL
PRISONERS EVERYWHERE.



Congratulations to Michael Deutsch

From Attica to Puerto Rican independistas to Muhammed Salah to Rasmea and beyond, you have always been there for our people!

Steven Saltzman 200 S. Michigan, Ste. 201 Chicago, Illinois 60604 (312) 427-4500 SSaltzlaw@gmail.com

> Michael, our friend and mentor

> > Ed & Lorry

The International Committee Celebrates and Congratulates Audrey Bomse, Co-Chair of the Free Palestine Subcommittee and Deserving Recipient of the Debra Evenson Veneceremos Award for International Human Rights Work.

Here she is with the 2011 Joint Guild Delegation on the Streets of Tunisia.



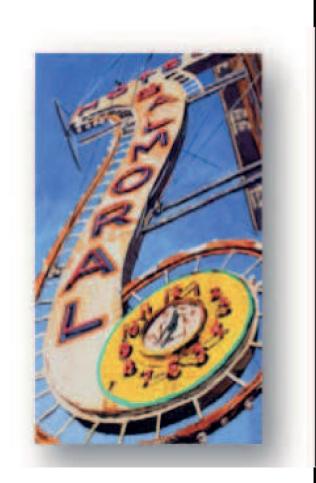
Le Dressay & Company

Le Dressay & Company is proud to support the important work of the National Lawyers Guild.

Le Dressay & Company represents clients in complex commercial, civil, and criminal litigation in Canada and the State of Arizona.

| #103-1525 West 8th Avenue, Vancouver, BC V6J 1T5 |

| T: 604-739-0017 | F: 604-739-0041 | www.ledressay.com | Artwork courtesy of Jeff Wilson (jeffwilsonart.org)

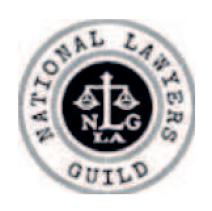


RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

The Los Angeles Chapter of the National Lawyers Guild salutes this year's #Law4ThePeople Honorees:

Soffiyah Elijah Albert Woodfox Michael Deutsch Audrey Bomse Javier Maldonado Noelle Hanrahan Emily Bock

"We need to do more than just what is right.
We need to join together and right what is wrong."
-Leonard Peltier



RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25

Congratulations, Javier!

Looking forward to seeing the work of your Latino litigator superpowers in the years to come.

Andrade Legal

Immigration Law

Congratulations to the Guild for its longtime struggle for peace and justice.

The Law Offices of Dorfman & Dorfman 72 Guy Lombardo Ave #2 | Freeport, NY 11520 (516) 379-0500

Congratulations, Audrey, for a well deserved award! And congratulations to all the honorees for your important and amazing work.

- Cathy Dreyfuss

Congratulations Emily on the C.B. King Award!

We're so proud of you!

Your Temple Law family

The NLG National Office congratulates the **National Immigration Project** of the NLG on their 45th year of fighting for immigrants' rights.

Happy anniversary, NIPNLG!



I want to thank the National Lawyers Guild for all the help they have given to Veterans for Peace to effect the freedom to stand at the Vietnam Memorial in New York City 24/7.

-John K. Spitzberg

Past President, Local 099 Veterans for Peace, Industrial Workers of the World

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

INDEX NO EX 693668/202166

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

The **DC NLG chapter** acknowledges honorees Albert Woodfox, practitioner Michael Deutsch and ALL of the honorees at the 2016 Law for the People Convention.

Please join us in **August 2017** for the **80th Anniversary Law for the People Convention**, in Washington, DC!
We will mark this special anniversary with a great convention, including radical lawyers, activists, guests and freedom fighters from across the country.

Hope to see you there!



Congratulations to Chicago NLG member Max Suchan, the first NLG Leonard I. Weinglass Memorial Fellow!

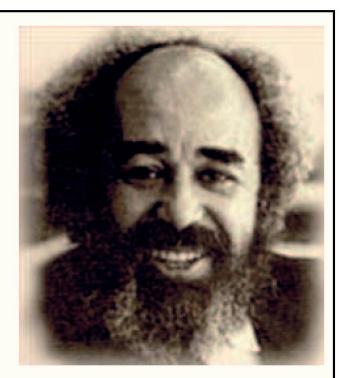
Max will be working with the Chicago Community Bond Fund to increase volunteer capacity and help develop organizational strategies to end money bond.

The Weinglass Fellowship will be offered annually a new Guild attorney to work on a specific civil rights or civil liberties project.

NYSCEF DOC. NO. 65 NYSCEF DOC. NO. 25

Congratulations to the 2016 NLG Haywood Burns Memorial Fellows!

The Haywood Burns Fellowships are designed to encourage projects in the NLG's tradition of "people's lawyering." The program exists to help students and legal workers apply their talents and skills to find creative ways to use the law to advance justice.



2016 Haywood Burns Fellows

Daniel Fryer, University of Michigan Law School Equal Justice Initiative

Martha Laura Garcia, Loyola University Chicago School of Law Illinois Migrant Legal Assistance Project

Joelle Eliza M. Lingat, CUNY Law Northeast New Jersey Legal Services Employment Opportunity Project

> **Anya Morgan,** University of Texas School of Law Sylvia Rivera Law Project

> > Crystal Peters, Brooklyn Law School Center for Popular Democracy

Mark Shervington, Legal Worker NYC-NLG Parole Preparation Project

Special thanks to all those NLG members and allies who donated to the 2016 Haywood Burns Fellowship Fund!

NYSCEF DOC. NO. 65
NYSCEF DOC. NO. 25

RECEIVED NYSCEF: 08/16/2018
RECEIVED NYSCEF: 09/24/2017

YOU'RE NOT AS YOUNG AS YOU USED TO BE.

DON'T LET THE VISION DIE.

REMEMBER THE GUILD IN YOUR WILL.

National Lawyers Guild Foundation

132 Nassau Street Room 922 • New York, NY 10038 (212) 679-5100 ext. 16 nlgfoundation@nlg.org



NYSCEF DOC. NO. Ø5

RECEIVED NYSCEF: 08/26/2018

2015 Banquet Donors

The National Lawyers Guild Foundation thanks our generous donors. Your support helps build a stronger Guild!

Abenicio Cisneros Alice Jennings-Edwards

Arthur Heitzer Avra Wing

Azadeh Shahshahani

Barbara Dudley Barbara Newman Barbara Rhine Benjamin Stein

Carpenter & Mayfield

Cathy Dreyfuss Constance Carpenter

Cynthia Heenan Dalisai Nisperos

Dave Mitchell

David Gespass

David Hettick

Diana Rothman Elba Galvan Gabriela Lopez

Goodman & Hurwitz, P.C.

Hannah Adams

Henry & Deborah Willis

Jalle Dafa

James Fennerty James Klimaski Jean Stevens Jeanne Mirer Jeffrey Petrucelly Jon Schoenhorn

Joseph Berra

Judy Somberg

Karen Jo Koonan Katherine Lewis

Kris Hermes

Larry Hildes

Liz Jackson

Lynne Wilson

Marc Van Der Hout

Maria Andrade

Marjorie Cohn Martha Schmidt

Matthew Ross Mattie Armstrong

Mike Godbe

Nancy Hormachea Nanette Kripke Natasha Bannan

National Immigration Project of the NLG

Neil Fox

NLG New York City Chapter

Noreen Farrell Pasquale Lombardo Priscilla Orta-Wenner R. Michael Flynn Rachel Gendell

Richard P. Koch Richard Soble & Barbara Kessler

Rudy Balderama Sasha Novis

Sonya Mehta Stephen Bingham Steven Goldberg

Theresa Kleinhaus Tim Hoffman

Urszula Masny-Latos

Val Carlson

William Monning

We make every effort to correctly list each donor's name and extend our heartfelt apologies for any mistakes. Please contact nlgfoundation@nlg.org for corrections.

DRK
COMPLAINT
Index No.: 653668/2016

Defendants National Lawyers Guild, Inc. and The National Lawyers Guild Foundation, Inc. by their attorney Jonathan Wallace, as and for their answer to the Amended Complaint, state as follows:

- Deny all of the assertions of paragraphs 1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 15, 17 (except admits the \$200 was refunded), 19 (except admits the ad did not run), 21, 22, 23, 24, 26, 28, 30, 31, 32, 33, 35.
- Deny knowledge and information sufficient to form a belief as to the truth of paragraph
 5.

FIRST AFFIRMATIVE DEFENSE

 The defendant's refusal to include plaintiff's ad in their publication is an editorial decision regarding content of a publication which is privileged under, and otherwise protected by, the First Amendment.

SECOND AFFIRMATIVE DEFENSE

4. The Complaint fails to state a cause of action.

THIRD AFFIRMATIVE DEFENSE

5. Plaintiff does not have standing to bring this action.

FOURTH AFFIRMATIVE DEFENSE

INDEX NO.3653682/316 RECEIVED NYSCEF: 08/16/2018 RECEIVED NYSCEF: 04/14/2018

6. There is no cause or controversy as required by New York law, and plaintiff seeks an advisory opinion only.

FIFTH AFFIRMATIVE DEFENSE

7. Damages as alleged by Plaintiff are de minimis, inconsequential, or speculative.

SIXTH AFFIRMATIVE DEFENSE

8. Plaintiff has unclean hands.

WHEREFORE, Defendants demand dismissal of the Complaint in its entirety, together with such other and further relief as may be just and proper, its reasonable attorney's fees, and the costs and disbursements of this action.

DATED: Amagansett, New York April 14, 2018

> /s/ Jonathan Wallace PO #728 Amagansett, N.Y. 11930 917-359-6234 jonathan.wallace80@gmail.com

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM INDEX NO. 653668/2016

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

Exhibit 3

COUNTY CLERK 08/16/2018 PM

RECEIVED NYSCEF: 08/16/2018

INDEX NO. 653668/2016

Benjamin Ryberg The Lawfare Project 633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995

NYSCEF DOC. NO. 65

County of New York

Supreme Court of the State of New York

Bibliotechnical Athenaeum, Plaintiff, Index No. 653668/2016 - against -National Lawyers Guild, Inc., & The National Lawyers Guild Foundation, Inc. Defendants.

Memorandum of Law in Support of Motion for Summary Judgment as to Liability

Plaintiff Bibliotechnical Athenaeum ("Bibliotechnical") by its attorney, Benjamin Ryberg, respectfully submits this Memorandum of Law in support of Plaintiff's motion for partial summary judgment as to Defendant National Lawyers Guild, Inc. ("NLG" or "Defendant").

As set forth in more detail below, Plaintiff would like to apply for an injunction barring the Defendant from future discrimination and, assuming the injunction is granted, to waive any claims for compensatory or punitive damages so that there will be no need for a trial. Moreover, although Defendant The National Lawyers Guild Foundation, Inc. (the "Foundation") has also been named as a Defendant, in the event this motion succeeds, Plaintiff would be willing to withdraw its claims against the Foundation in

COUNTY CLERK

08/16/2018

SCEF DOC. NO. 65

INDEX NO. 653668/2016

RECEIVED NYSCEF: 08/16/2018

order to save time. Even though it appears the Foundation was a party to the discriminatory conduct, an injunction only as to NLG would satisfy the Plaintiff.

Introduction

The undisputed facts in this matter show that the Defendant ("NLG") discriminated against the Plaintiff ("Bibliotechnical") by refusing to run a Dinner Journal advertisement on the basis of Plaintiff's Israeli national origin and citizenship. This is a clear violation of the New York City and State Human Rights Laws. Accordingly, based on the undisputed facts, Plaintiff is entitled to summary judgment enjoining the Defendant from engaging in discriminatory activity.

If the Court grants this injunction, Plaintiff will waive any claim for compensatory or punitive damages and thus there will be no issues left to try.

Facts and Procedural History

By way of background, this matter is a discrimination claim brought by the Plaintiff ("Bibliotechnical" or "Plaintiff") against the Defendants for refusing to run a Dinner Journal ad and permit participation in NLG's annual banquet on account of Bibliotechnical's Israeli citizenship and national origin. (Ryberg Aff. Exh. B)

In advance of NLG's annual convention, which was held in New York in August of 2016, NLG placed solicitations on its internet website for participation in the Convention. (Abrams Aff. Para. 2-3). Among other things, the solicitation offered tickets to an annual banquet and advertisements in its Dinner Journal to be distributed at the banquet. (Id.) Significantly, these services were all held open to the general public and

NYSCEF DOC. NO. 65 RECEIVED NYSCEF: 08/16/2018

not limited to members in any way. (Id.) The solicitation for advertisements stated as follows:

Placing an ad in the journal is a great way to congratulate our outstanding honorees (http://www.nlg.org/convention/2016-nlg-honorees), recognize this year's keynote speaker, Elle Hearns, publicize your firm or organization, or just share a message of your own—all while supporting the Guild!

(Abrams Aff. Para. 3)

On or about June 26, 2016, Plaintiff (an Israeli corporation) attempted to place a \$200 advertisement in the Dinner Journal. (Abrams Aff. Para. 4-5)

A copy of the proposed advertisement, when compared with the contents of the 2016 Dinner Journal, shows that the proposed advertisement was typical of ads accepted in the Dinner Journal for that year. (Abrams Aff. Para. 6) More specifically, the message contained in the advertisement—"Congratulations to the honorees"—was in no way political. (*Id.*)

NLG rejected the advertisement, admitting openly that the rejection was due to the Plaintiff's Israeli national origin and citizenship. (Abrams Aff. Para. 4-5)

Subsequently, Bibliotechnical brought suit in this Court seeking damages and injunctive relief. NLG moved to dismiss, and that motion was denied in April 2017. (Docket Entry #19). In September 2017, Bibliotechnical filed an amended complaint. NLG again moved to dismiss, and that motion was denied in March 2018. (Docket Entry #39). NLG filed its Answer to the Amended Complaint in April 2018 (Docket Entry #42). This motion follows.

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM INDEX NO. 653668/2016

WIGGER DOG NO. CF

RECEIVED NYSCEF: 08/16/2018

Argument

I. All Elements of Plaintiff's Claims Are Present Based on the Undisputed Facts

Under the New York City Human Rights Law, it is unlawful "[b]ecause of any person's actual or perceived . . . national origin . . . or citizenship status, directly or indirectly . . . [t]o refuse, withhold from or deny to such person the full and equal enjoyment, on equal terms and conditions, of any of the accommodations, advantages, services, facilities or privileges of the place or provider of public accommodation"

New York City Human Rights Law § 8-107(4)(1)(a). The State Human Rights Law contains similar provisions. *See* New York Executive Law § 296(2)(a).

As set forth in more detail below, all of the elements therein are met as a matter of law.

A. Public Accommodation

As the Court correctly held in April 2017, "public accommodation" is defined very broadly under both statutes and applies to the situation at hand subject to review of the 2016 Dinner Journal itself. (Docket #19 at 11). The Court reiterated its reasoning in March 2018 when it again rejected NLG's advancement of the (same) argument that neither the 2016 banquet nor the Dinner Journal constitute public accommodations. The 2016 Dinner Journal has been supplied with this motion and it confirms Plaintiff's claims that the proposed advertisement was similar in content to ads that were in fact accepted. Accordingly, as a matter of law, Plaintiff was denied services of a public accommodation within the meaning of the anti-discrimination laws.

B. Discrimination

Similarly, there is no dispute that Plaintiff was denied such services on the basis of its Israeli national origin and citizenship. Indeed, the Defendant specifically and

NYSCEF DOC. NO. 65 RECEIVED NYSCEF: 08/16/2018

explicitly advised Plaintiff that this was the reason its money would not be accepted.

Accordingly, as a matter of law, NLG has violated the anti-discrimination laws.

C. Boycotting, Blacklisting, or Refusing to Sell

Under the New York City Human Rights Law, it is unlawful "for any person to discriminate against, boycott or blacklist or to refuse to buy from, sell to or trade with, any person, because of such person's actual or perceived . . . national origin . . . or citizenship status " New York City Human Rights Law § 8-107(18).

Similarly, the New York State Human Rights Law makes it unlawful "for any person to boycott or blacklist, or to refuse to buy from, sell to or trade with, or otherwise discriminate against any person, because of the . . . national origin . . . of such person " New York Executive Law § 296(13).

There is no dispute as to the fact that Defendant refused to sell ad space in its Dinner Journal to Plaintiff because of Plaintiff's Israeli national origin and citizenship. Again, Defendant specifically and explicitly advised Plaintiff that this was the reason its money would not be accepted as payment for the ad space. Evidently, this refusal was an implementation of NLG's organizational anti-Israeli boycott policy. Accordingly, as a matter of law, NLG has violated the anti-discrimination laws.

II. Plaintiff is Entitled to an Injunction

Under both the City and State anti-discrimination laws, Plaintiff is entitled to injunctive relief. *See* New York City Human Rights Law § 8-502(a) ("[A]ny person claiming to be aggrieved by an unlawful discriminatory practice as defined in chapter one of this title . . . shall have a cause of action in any court of competent jurisdiction for . . . injunctive relief"); New York Executive § Law Section 297(9) ("Any person claiming to be aggrieved by an unlawful discriminatory practice shall have a cause of

FILED: NEW YORK COUNTY CLERK 08/16/2018 01:31 PM

INDEX NO. 653668/2016

NYSCEF DOC. NO. 65

RECEIVED NYSCEF: 08/16/2018

action in any court of appropriate jurisdiction for damages, . . . and such other remedies as may be appropriate").

Accordingly, the Court should enter an order enjoining NLG from refusing advertisements from Israeli persons on account of their national origin or citizenship. If the Court grants such an injunction, Plaintiff will waive compensatory and punitive damages as well as aiding and abetting liability against the remaining Defendant so that there is no need for a trial.

Conclusion

For the foregoing reasons, the Court should enter an order permanently enjoining NLG from refusing advertisements in its Dinner Journal from Israeli persons on account of their national origin or citizenship and closing this case.

Respectfully submitted,

/s/ Benjamin Ryberg

Benjamin Ryberg, Esq. Attorney for Plaintiff The Lawfare Project 633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995