

D.N. FBT-FA-19-6088163-S) SUPERIOR COURT
CHRISTOPHER AMBROSE) J.D. OF FAIRFIELD
v.) AT BRIDGEPORT
KAREN AMBROSE) March 16, 2022

PLAINTIFF'S CLAIMS FOR RELIEF
AND PROPOSED ORDERS FOR TRIAL

The Plaintiff in the above-captioned matter proposes the following orders issue:

1. Custody. When Plaintiff filed for divorce in July 2019, he requested shared legal and physical custody because knowing both parents is best for the children. Defendant never responded to this offer. Unfortunately, over the last 2 years 8 months, it has become painfully clear from Defendant's conduct that she is not in a position to have legal or physical custody, and in fact it would not be in the children's best interest. Therefore, in accordance with the recommendations in the Custody Evaluation prepared by Dr. Jessica Biren Caverly (the "Evaluation"), Plaintiff shall continue to have sole legal and physical custody of the children.

2. Visitation. It is important to Plaintiff that Defendant have a path to reunify with the children because it is in their best interest, but only when and if she is safely able to do so. Defendant shall not have contact or visitation with the children until she has undergone therapy, as outlined herein below, and Defendant is also in successful compliance with each of the following provisions:

- **No contact.** Until such time as outlined below, Defendant shall have no contact whatsoever with the children, as recommended in the Evaluation. "No contact" includes, but is not limited to, any encounter or communication with any or all of the children in-person, via telephone, email, text, image, app or other social media of any sort. Nor shall Defendant hire, direct or request any third party to so contact the children.
- **Apology.** For well over a year and continuing through the present day, Defendant has been providing narratives and/or information about the children to at least three different sites on the Internet, before and subsequent to Court Order #377. She has also been providing narrative denigrating Plaintiff to these same sites. These sites are accessible by the public and the children and continue to cause significant emotional trauma to the

children and to Plaintiff, who is also being *per se* defamed by Plaintiff's false accusations of pedophilia and child abuse, which are causing him considerable and perhaps irreparable financial harm, as will be explained.

It is critically important that Defendant recognizes and wants to repair the significant damage she has caused to her family and is willing to show that she accepts responsibility for her actions. To do so, she shall write letters to each of the following blogs/YouTube sites:

the *family court circus*, Frank Parlato at *The Frank Report.com* and Wayne Dolcefino at *Dolcefino.com*. Each letter shall contain a cc to the GAL and Plaintiff. In each letter, Defendant shall state:

- that she would like her letter to be published, in full, on the website;
- that despite anything to the contrary that she indicated previously, she does not believe Plaintiff is a pedophile, and has so testified in court;
- that DCF and the police have thoroughly investigated her allegations of abuse against Plaintiff and that every one of them was deemed unsubstantiated;
- that while in Plaintiff's care, the children were not "caged" or "isolated" or otherwise abused by him; in fact, they regularly attended school, activities, play dates and private therapy sessions;
- while in Plaintiff's care, the children had phone and FaceTime calls and in-person visits with Defendant's friends and extended family, including Defendant's sister and her family, who celebrated Christmas Eve with Plaintiff and the children;
- the children each have their own laptops and phones, which they are able to freely use to communicate privately with their friends, extended family and others;
- that Defendant provided the website with confidential information about the children, which she should not have done;
- that she is now requesting that any material, whether print, photos, audio or video, as well as any narrative that she provided about the children and/or Plaintiff immediately and permanently be removed from the website;
- that she is requesting the website immediately and permanently remove any narrative or other information (including correspondence, reports, billing statements and communications in any form) that she provided pertaining to any of the children's providers, the GAL, Plaintiff's counsel and any associates and family member of any of these people.

Defendant must also publish copies of these three letters on any and all of her own FaceBook page accounts.

- **Privacy protections.** Defendant is prohibited from violating the privacy of the children and Plaintiff and shall not share with any third party or entity through any means, any narrative or information, including but not limited to videos, photos, texts and any sort of written material, about the children, including but not limited to their mental, emotional,

physical health, their school performance and grades, their interactions with and relationship with Plaintiff, and/or about Plaintiff, including but not limited to narrative or information about his career, financial situation, these proposed orders and his birth family. Defendant is prohibited from violating the privacy of the children and/or Plaintiff by communicating or sharing in any manner any of the information described above about the children or Plaintiff with any member of the traditional or social media, including but not limited to “bloggers” or YouTube, by sharing with anyone who will communicate or share on Defendant’s behalf such information to any traditional or social media.

- **Safety of Children.** Defendant has provided Plaintiff’s home address, where he resides with the children, to the blogs/websites, which have published the address and even incited readers/viewers to go by the home. In addition, Defendant has caused multiple third-party adult males, not known to Plaintiff, to enter his property to interact with the children, which has required calls to the police and caused the children significant emotional distress. Therefore, Defendant is prohibited from hiring or requesting any third party to come within one mile of Plaintiff’s home or the children’s schools. Based on Defendant’s own prior conduct, Plaintiff has a reasonable, good faith apprehension that Defendant may attempt to take (or request or hire a third party to take) the children and not return them even if a court order requires her to do so. Therefore, Defendant is prohibited from coming within one mile of the Plaintiff’s home at 381 Horsepond Rd. in Madison, CT or any of the children’s schools without his prior written consent.
- **Intimidation/Harassment.** In the recent past, Defendant has caused many people, including Plaintiff, his counsel, the GAL, custody evaluator and many of the children’s providers to feel threatened, harassed or intimidated due to communications from her or from third parties associated with her. Defendant is prohibited from communicating in any way with any of these individuals or with any other professionals involved in the past or present with the children. Defendant is prohibited from hiring or requesting any third party to so communicate on her behalf with such individuals.
- **Sanctions.** Defendant is in willful contempt of virtually every court order issued against her. Her inability to comply with court orders has caused the children and Plaintiff considerable emotional pain and financial expense. If Defendant does not comply with any of the provisions outlined above and herein, the following sanctions shall be levied against Defendant:
 - Each violation must result in Defendant paying a \$1000 fine to a fund that shall be established for the children and shall only be used on their behalf (the “Fund”). If Defendant does not pay such fine(s) within 30 days of the discovery of the precipitating violation(s), the fine shall be increased by \$1000 every 30 days until it is paid in full. This fine shall not be pro rated.

- If Defendant violates any of the above provisions, any progress toward contact with the children shall immediately be deemed to cease for a period of not less than 30 days.
- **Therapy.** As recommended in the Evaluation, Defendant must be attending and participating in good faith in individual therapy with a highly experienced therapist, who shall work under the direction of the reunification specialist, Dr. Robert Horwitz. In the past, Defendant's psychiatrist relied exclusively on Defendant's version of events, dismissed the Evaluation and the evaluator, did not collaborate as intended with Dr. Horwitz and the GAL, and consequently did not foster reunification with the children. The requirements regarding therapy identified herein are designed to avoid this problem and achieve successful therapy for Defendant so that she can reunify with the children, which is the most important goal. Before Defendant begins therapy:
 - Dr. Horwitz shall inform the selected therapist selected that the focus of therapy shall be as recommended in the Evaluation: how Defendant's personality traits and style impact her relationships with Plaintiff and the children; how she can better co-parent with Plaintiff; and that her relationship with the children is more important than "winning" her war with Plaintiff.
 - The therapist must agree to provide regular, written updates on Defendant's attendance and progress at least as frequently as after every fourth session.
 - A copy of the Evaluation shall be provided to the therapist, and he/she must also read the posts about the family that are on three identified blogs to which Defendant has provided so much narrative and information.
 - A meeting must take place with the Dr. Horwitz, the GAL and the therapist at which the Evaluation, the contents of the three blogs and Defendant's conduct vis a vis the children and Plaintiff must be discussed. The point of this meeting is to insure that the therapist is provided with an objective, thorough understanding of the family's conflicts and Defendant's role, before therapy begins.
 - Whether the therapist selected is the "right fit" shall be determined by Dr. Horwitz at his sole discretion, a judgement he may exercise at any point before or during therapy.
 - After Defendant has successfully been engaging in the therapy as described herein for an amount of time to be determined by Dr. Horwitz, the GAL and Plaintiff and if Defendant is in full compliance with all other provisions above and herein, contact with the children may be considered, with the expectation that supervision will be required as suggested in the Evaluation and that very specific guidelines shall be provided.

SUPPORT

1. Alimony. Neither Plaintiff nor Defendant are currently employed. Plaintiff shall pay alimony to Defendant in the amount of \$1 a year for a period of three years from the date of divorce,

which shall be non-modifiable as to term. Defendant shall pay alimony to Plaintiff in the amount of \$1 year for period of three years from the date of divorce, which shall be non-modifiable as to term.

Modification of current support. Husband's obligation to pay \$3100/month in support to Wife pursuant to Court Order #362.10 shall terminate effective March 31, 2022. Husband will make a payment of \$2100 on April 1, 2022 and a payment of \$2000 on May 1, 2022 to Wife, such payments representing the outstanding arrearages referenced in Order #362.10.

2. **Health insurance.** Plaintiff and Defendant shall each be solely responsible for their own health insurance following the date of the divorce.

3. **Child Support.** Defendant shall pay child support to the Plaintiff in accordance with the CT Child Support Guidelines. However, Defendant is currently unemployed and this child support obligation shall not be enforced unless and until Defendant becomes employed.

- Change in employment status. Once Defendant is employed, she shall immediately notify the Plaintiff and any new income shall modify the child support amount to be paid to the Plaintiff, retroactive to the date of employment.
- Change in financial circumstances. Defendant has not provided a complete Financial Affidavit and has stopped attending the trial and so has not submitted full testimony about her financial situation. However, Plaintiff has a reasonable, good faith belief that Defendant is currently or will become a beneficiary of a significant trust account, established by her father, or shall otherwise receive significant financial benefit from father or birth family. When any such benefit occurs, whether formally or informally, Defendant shall notify Plaintiff of any new income, settlement, gift, bequest, right or any change whatsoever in her financial circumstances, whether due to her father's largess or to any other individual, entity or circumstance. Any new funds shall modify the child support amount to be paid, retroactive to Defendant's receipt of such benefit.
- Children's Health Insurance. Plaintiff shall continue to provide health insurance for the children under his current health insurance plan. Once such plan lapses, Plaintiff will continue to provide health insurance for the children through COBRA. At that time, Plaintiff and Defendant shall each pay one half of the insurance premium for each child, until each child reaches age 22 or is covered by health insurance.
- Children's Unreimbursed Medical Expenses. The parties shall each pay one half of the cost of the children's unreimbursed medical expenses.
- Extracurricular fees. Plaintiff shall pay the costs of all extracurricular activities. Each party shall pay half of any overnight trip(s) taken by any child as part of a school outing (e.g., to Washington DC).
- College Tuition. If the family remained intact their intent was to send the children to college. CT General statute 46b-56c shall be applied by the court at the time that the children enter college, and at that time the court shall decide each parent's financial obligation to provide for cost of college up to the UCONN cap for the three minor children.

4. Division of Property. The parties divided their personal property prior to the sale of the marital home.

- **Children's possessions.** Many of the children's items remain in Defendant's possession. Per order of this court on February 16, 2022 (#363.10), the children sent a list of the items they were requesting to Defendant. To date, Defendant has not responded. These items include expensive hearing devices (Phonak and "Roger Pen") needed by the daughter, as well as costly electronics (Apple watch, iPads, Chromebook,), bicycles and other personalty. Many of these items are needed by the children now (the hearing aid and electronics). Defendant shall be responsible for returning the itemms (at her sole cost) within 10 days of the date hereof or she shall be responsible for the cost of replacing these items (approx. \$4000).

5. Vehicles: Plaintiff shall retain the vehicle he drives. Defendant shall retain the vehicle she drives. Titles shall be transferred within 30 days from the date of divorce, and both parties are solely responsible for their own car insurance following the divorce.

6. Bank Accounts. The parties have no joint bank accounts. Plaintiff shall retain his bank accounts, which are listed on his Financial Affidavit, free and clear of all demands from Defendant. Defendant shall retain her bank accounts, which are unknown to Plaintiff.

7. Credit card and other debt. The parties no longer share a joint credit card. Each party shall be responsible for his/her own credit cards and any personal loans or other debt incurred individually through the date hereof.

8. Legal fees. Pursuant to a Stipulation between the parties, which was made an order of the court (#203), each party shall be solely responsible for their own legal fees, including any expert witnesses or private investigators, etc.

9. Life insurance. Plaintiff shall retain the current amount of life insurance he has at the time of the divorce, and shall keep the children as the named beneficiaries.

10. Retirement Accounts. Plaintiff was the sole provider during the entirety of the marriage. Defendant entered the marriage with very modest financial resources and after the marriage in June 2004 did not financially contribute, except for tutoring a middle school student part-time before the couple had children. Plaintiff and the court have very little information about Defendant's finances, here is what is known:

- **Defendant's Financial Affidavit.** For well over a year, Defendant has ignored numerous requests and court orders directing her to provide financial and other information. The Financial Affidavit Defendant she submitted is incomplete. She has not appeared in court in over six months and has not submitted to a full examination where she could be asked about her finances.

- Defendant's failure to report assets. In the limited testimony Defendant has provided, she was forced to acknowledge that she unilaterally and covertly liquidated an entire pension fund held by the Greenwich, CT Board of Ed. She could not specify the amount she realized from this transaction beyond stating it was in excess of \$100,000. She has refused to provide any documentation to verify the claim nor did she reference this money on her Affidavit. Likewise, Defendant did not include on her Affidavit an investment account in her name held at Morgan. Plaintiff estimates this account to be valued at approximately \$35,000. It is unclear if she unilaterally and covertly redeemed that fund because she has not appeared in court to be questioned about it. There may be other resources that Defendant has hidden or not reported.

- Plaintiff's financial support of Defendant.
 - From the time he filed for divorce in July 2019 to May 2021, Plaintiff has directly paid Defendant's rent as well as any other bills of any sort that Defendant submitted to him. Plaintiff has also paid all charges on the joint credit card that Defendant used freely and without any restriction or control, using it to make necessary as well as discretionary purchases. Given their dwindling financial circumstances, Plaintiff considered some of her purchases to be frivolous or irresponsible (e.g., \$2440 for concert tickets; \$2582.57 for Nintendo video games in a 4 month period), but he never refused to pay any bill she submitted.
 - In May 2021, at Defendant's attorney's request, the court issued support orders (Order # 346). Plaintiff made the required monthly payments for five months. After payment in the third month, he alerted Defendant that in order to make her payments after the fifth sixth month, he would need to sell stock which would require her signature. Without explanation, Defendant ignored his repeated requests and refused to consent the sale of stock. Plaintiff alerted the court and with the court's order (#362.10) has resumed making payments, including the arrearages.

- Dissipation of assets. Since Plaintiff filed for divorce, all of the family's investments as well as all the equity realized by the sale of the marital home, have been expended, a total loss approaching \$1,000,000. The vast majority of this loss of marital funds is due to the fees paid to attorneys and other professionals who were involved far more intensively than is typical in a dissolution case due to Defendant's relentless false allegations of abuse against Plaintiff and her egregious refusal to participate reasonably in the judicial process. The marital estate was further dissipated by Defendant's fiscal irresponsibility and refusal to cooperate with Plaintiff.
 - Defendant's false allegations. Within 2 weeks of Plaintiff filing for divorce in July 2019, Defendant involved the police for the first time in the family's history and took the children, refusing to say where she was going or when she would return. Later, Plaintiff learned that Defendant had made false allegations of stalking against him and had left the state with the children, confiscating their phones and changed her own number.

- Soon thereafter, Defendant escalated her allegations to falsely claim that Plaintiff was emotionally and sexually abusing the children. All of these allegations were eventually proven false (after lengthy and very distressing investigations), but they could have resulted in Plaintiff's incarceration. The court appointed a GAL (~~cost of the GAL \$121,000.00~~), who ultimately recommended a professional custody evaluation. The cost of the custody evaluation was \$12,000, and the evaluator's subsequent testimony was an additional ~~\$6,000~~ *Funds*.
- Initially, Defendant was awarded primary custody of the children, with Plaintiff having modest visitation. As she had done during the marriage, Defendant denigrated Plaintiff to the children. This increasingly impeded their relationships with him and so visitation and required considerable time and attention from (and so incurred the cost of) the GAL and Plaintiff's counsel.
- In April 2020, after Plaintiff was awarded temporary sole custody, Defendant repeatedly violated the court's no contact orders, during one period she used a "burner" phone number to covertly contact the older son, directing him to accuse Plaintiff of abuse. She also continued to make serious accusations of abuse to DCF and various police departments. All the accusations were investigated at length and deemed unsubstantiated, but nevertheless required the frequent involvement of the GAL and Plaintiff's counsel, which dissipated the marital assets at an alarming rate. Right to the present date, Defendant continues her egregious conduct and false reporting. On the night of Feb. 10, 2022, Madison PD received a call from Defendant's associate, Paul Boyne, and came to Plaintiff's home to do a welfare check of the children.
- Since July 2019, Defendant's false allegations of abuse against Plaintiff have resulted in the following episodes (not a complete list): the children being taken to a hospital and examined for abuse, twice; a 5 hours-long stand-off with DCF and the police v. Defendant at a hotel, while the children were present; multiple court hearings in both New Haven and Bridgeport courts; many status conferences and phone calls. Each of these episodes involved many hours of GAL and attorney time (including prep and travel costs), and often the therapists, all of which lead to the dissipation of enormous portions of the marital assets.
- Defendant's misconduct during trial. During the divorce trial, Defendant's actions wasted many hours of court time and resulted in significant professional fees, which greatly depleted the marital funds. Defendant's counsel caused some delays, but on multiple occasions Defendant herself simply didn't show up, without prior warning, wasting everyone's time and money. Throughout the trial, Defendant relentlessly ignored multiple court orders to provide evidence, which wasted considerable time. Her refusal to provide her laptop alone squandered many hours in and out of the courtroom and involved briefs, testimony, even the appointment of a DSM. During all of this - a period of several days (with attendant professional fees) - Defendant alone knew that she had already destroyed the laptop that was the subject of all this time.

- The court has imposed monetary sanctions for some of Defendant's misconduct; she currently owes fines for her contempt of the following court orders: Order #312 (\$36,100, through March 16, 2022); Order 349.10 (\$14,100, through March 16); and Order #361.10 (\$26,900, through March 16, 2022).
 - Defendant's financial irresponsibility. As with visitation and custody, Defendant has refused to cooperate with Plaintiff regarding the marital finances. This has resulted in the further dissipation of marital assets.
 - In fall of 2019, without Plaintiff's knowledge or consent, Defendant signed an 18-month lease for a waterfront home in Guilford for \$3500/month (total cost: \$63,000) and purchased new furniture, including bedroom sets for the children (approx. \$5,500) rather than using their existing furniture.
 - Despite numerous requests from Plaintiff, Defendant has: refused to submit covered healthcare expenditures to insurance for reimbursement; refused to provide the children's phones, which required the purchase of new ones; charged portions of her legal expenses (including private investigators) to a joint credit card in violation of Stipulation # 203.10, by which she agreed to pay these expenses from her proceeds from the sale of the marital home. The total of these expenditures is \$34,000.
 - For over a year, Defendant has had the professionally prepared tax returns. She has been encouraged to ask or have her attorney or an accountant ask any questions. Nothing has been asked but without explanation, she has refused to sign the returns so they cannot be filed, which has kept the family from receiving refund and stimulus money (approx. \$11,000).
 - There are other amounts that have been paid with marital funds that Defendant alone should be liable to pay on principle: After using a specious application to obtain a TRO and take custody of the children, Defendant took them to a hotel to avoid the police (two nights lodging \$595.70; meals \$200; total: \$795.70). To avoid complying with a court order to produce her laptop, Defendant intentionally destroyed the computer (and the evidence on it) then purchased herself a new Apple laptop (\$1214). Fairness dictates Defendant alone should absorb these costs.
- Impact of Defendant's conduct on Plaintiff's ability to find employment. As indicated above, Defendant has provided confidential, some of which was court-protected, information about the family to at least three different blogs and/or websites: family court circus.com, The Frank Report.com and dolcefino.com Through the present day, Defendant has also caused these sites to publish many false narratives about the Plaintiff accusing him the most heinous behavior - that he is a pedophile who has sexually, emotionally and physically abused his children, including keeping them "caged." Without any evidence, she has also alleged that he has stolen a significant sum of money from her.

- In the brief testimony she has provided in this trial, Defendant stated that she did not believe Plaintiff was a pedophile; moreover, in her proposed orders (#314), she does not ask that Plaintiff be required to have supervised visitation with the children. These facts demonstrate that Defendant knows the accusations of pedophilia she has made - to these public blogs, to DCF and to the police - are false. The emotional trauma and distress these accusations have caused the children and Plaintiff are significant, as is the impact on his ability to find work.
- The false claims Defendant has published are not only morally reprehensible, they are defamatory *per se* for they accuse Plaintiff of crimes punishable by imprisonment. *Gleason v. Smolinski*, 319 Conn. 394, at 430, n 31 (2015). “In the case of a statement that is defamatory *per se*, injury to a plaintiff’s reputation is conclusively presumed such that a plaintiff need neither plead nor prove it.” *Id.*
- For over 20 years Plaintiff has been successfully employed as a network television writer/producer, which required him to work close to NYC or LA. As explained, since 2019, the children have moved 5 times. Plaintiff is loathe to move the children yet again; therefore, for over a year, he has been looking for work locally, outside of his field. He is objectively over-qualified for most of the positions he has applied for, but he has learned that the first thing employers do with a job candidate is Google his name. It’s very difficult to get hired when there are multiple websites, even YouTube videos, identifying you as a most heinous child abuser. Plaintiff is reasonably apprehensive that Defendant’s very deliberate campaign to label him a pedophile and child abuser has rendered him unemployable, at least as far as positions someone with his education and experience would qualify for. “Scrubbing” a reputation from the Internet is extremely expensive and not always successful, but Defendant should be responsible for paying the \$25,000 to start this process.
- The court has great discretion in determining what constitutes an equitable division of assets in a dissolution. Importantly, “§ 46b-81 (a) permits the farthest reaches from an equal division as is possible, allowing the court to assign to either the Plaintiff or Defendant all or any part of the estate of the other. ... On the basis of the plain language of § 46b-81, there is no presumption in Connecticut that marital property should be divided equally prior to applying the statutory criteria.” (Internal quotation marks omitted.) *Kaczynski v. Kaczynski*, 124 Conn. App. 204, 213, 3 A.3d 1034 (2010). Additionally, “[i]ndividual financial orders in a dissolution action are part of the carefully crafted mosaic that comprises the entire asset reallocation plan. ... Under the mosaic doctrine, financial orders should not be viewed as a collection of single disconnected occurrences, but rather as a seamless collection of interdependent elements.” (Internal quotation marks omitted.) *Barcelo v. Barcelo*, 158 Conn. App. 201, 226, 118 A.3d 657, cert. denied, 319 Conn. 910, 123 A.3d 882 (2015).

- A dissolution court is also permitted to attempt to restore a party who has been injured by a spouse's financial misconduct, even when it occurs post separation. "[W]e conclude in part I A of this opinion that a trial court possesses inherent authority to make a party whole for harm caused by a violation of a court order, even when the trial court does not find the offending party in contempt. In part I B of this opinion, we conclude that the trial court properly exercised that authority in the present case." *O'Brien v. O'Brien*, 326 Conn. 81, 96, 161 A.3d 1236, 1249 (2017).
- In light of the fact that Plaintiff was the sole earner during the marriage, that he shall have sole custody of the three children and bear the primary responsibility for their support, that Defendant's relentless misconduct has financially depleted the marital assets and that her still continuous, deliberate efforts to publicly defame Plaintiff as a child abuser have severely damaged his ability to find work, the Retirement Accounts (including IRA, SEP IRA and Roth IRAs) shall be divided so that Plaintiff retain 80% of the value of the accounts and Defendant shall receive 20%. Once such transfer is made to Defendant, Defendant shall have no claim or demand against Plaintiff's retirement funds.

11. **Mutual Funds.** The Bruce Fund is the sole remaining mutual fund held by the parties. Currently it is worth approximately \$12,000. The court shall direct the Fund to accept Plaintiff's signature on a redemption letter requesting the liquidation of all remaining shares, with the proceeds electronically deposited in Plaintiff's bank account. The proceeds will then be divided with Plaintiff retaining 80% and 20% being delivered to Defendant.

12. Following the numerous motions filed by Defendant, many of which are duplicative of prior motions and many of which do not comply with the Connecticut Practice Book in that they are either argumentative or lacking in form, the court shall enter an order such that Defendant must request leave of the court to file any new motions using appropriate form on the judicial website.

THE PLAINTIFF

BY: 

CERTIFICATION

I certify that a copy of the above was or will immediately be ~~mailed or~~ delivered electronically or non-electronically on 3/16/22 to all counsel and self-represented parties of record and that written consent for electronic delivery has been received from all counsel and self-represented parties of record who were or will immediately be electronically served, including;

Jocelyn B. Hurwitz, Esq

Karen Riordan Ambrose


