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March 30, 2017

VIA CM/ECF and ELECTRONIC MAIL

Honorable Christine M. Gravelle, U.S.B.J.
United States Bankruptcy Court
Martin Luther King, Jr. Federal Bldg. and Courthouse
50 Walnut Street, Third Floor
Newark, NJ 07101
E-Mail: Chambers_of_cmg@njb.uscourts.gov

**Re: Zucker, Goldberg & Ackerman, LLC
U.S.B.C. Docket No.: 15-24585 (CMG)**

Dear Judge Gravelle:

The undersigned serves as counsel to Zucker, Goldberg & Ackerman, LLC (“ZGA” or, the “Debtor”). The Debtor respectfully requests that Your Honor accept this letter reply to the *Limited Objection to the Joint Plan* (the “Limited Plan Objection”) [Doc 792; duplicate Doc 797], filed by Carolyn Bailey (“Ms. Bailey”), in lieu of a more formal pleading.

Ms. Bailey’s connection to this bankruptcy case stems from a prepetition lawsuit against the Debtor and its principal, Michael S. Ackerman, Esq., filed in the Superior Court of New Jersey (the “Bailey Action”). The Bailey Action alleges fraud and violations of the New Jersey Racketeer Influenced and Corrupt Organizations Act (“RICO”). The Bailey Action was dismissed by Judge James S. Rothschild, Jr. shortly before this bankruptcy was filed. Ms. Bailey appealed the decision and, on October 13, 2015, secured limited stay relief permitting the Superior Court of New Jersey, Appellate Division to render a decision on the appeal. [Doc 183]. On August 26, 2016, the Superior Court of New Jersey, Appellate Division issued its opinion affirming Judge Rothschild’s decision dismissing the Bailey Action (the “Appellate Decision”). On October 11, 2016, Ms. Bailey obtained stay relief to file an appeal to the Supreme Court of New Jersey by way of a *Petition for Certification*. On November 28, 2016, Ms. Bailey’s notice of petition for certification was denied because it was filed out of time. The New Jersey Supreme Court granted a subsequent motion by Ms. Bailey to file a petition out of time.

ZGA, through its attorneys at Connell Foley LLP, has filed a response. The parties are awaiting a ruling from the New Jersey Supreme Court on Ms. Bailey's *Petition for Certification*.

The Debtor notes, as the Appellate Court saw fit to in the Appellate Decision, that Ms. Bailey has now unsuccessfully pursued her claims, in various forms, before the Superior Court of New Jersey Chancery Division General Equity Part, the United States District Court of the District of New Jersey, the Third Circuit Court of Appeals, the Superior Court of New Jersey Law Division, the Appellate Division (on two occasions), and - once before the current appeal - the New Jersey Supreme Court.

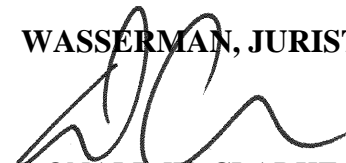
Ms. Bailey is not a creditor in this case. Ms. Bailey is a disgruntled litigant unwilling to accept the sound determination of the courts in dismissing her unfounded claims. Frustrated that her hyperbolic allegations against ZGA and its principal have been unequivocally rejected by the courts, Ms. Bailey's latest appeal levels allegations of judicial misconduct, including the intentional destruction of evidence by a Superior Court judge. Ms. Bailey appears undeterred by the fact that the origin of her unwarranted challenges arises from her own undisputed failure to make a single mortgage payment since 2006. All of the harms Ms. Bailey complains of arise *after* this disregarded detail.

During the Court's telephonic hearing on Ms. Bailey's last motion for stay relief, Your Honor directed Ms. Bailey to communicate her concerns through the Committee. She has apparently failed or refused to satisfy that directive. Furthermore, as per usual, Ms. Bailey has circumvented the traditional practice of contacting the Debtor (or its counsel) directly in an effort to resolve her issues without unnecessary involvement by the Courts. Had Ms. Bailey contacted either the Committee or the Debtor, she would have been informed that the questions she raises in her Limited Plan Objection are irrelevant to the Court's April 7th hearing on the Disclosure Statement.

With respect to the Limited Plan Objection, the Debtor respectfully submits that Ms. Bailey's concerns should be first addressed by the Committee. Any of Ms. Bailey's residual concerns can be addressed at the confirmation hearing.

Respectfully submitted,

WASSERMAN, JURISTA & STOLZ, P.C.



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