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August 16, 2012

RE: *O'Hara v. Raniere et al.*  
1:12-cv-00252

Hon. Gary L. Sharpe, Chief Judge  
James T. Foley U.S. Courthouse  
445 Broadway, Room 112  
Albany, NY 12207  
**Filed Electronically**

Dear Judge Sharpe:

Defendants David Soares and Albany County are in receipt of Plaintiff O'Hara's August 14, 2012 letter addressed to the Court, attached hereto, requesting an additional three months in which to respond to Defendants' motion to dismiss. Defendants request that this Court reject Plaintiff's petition and grant Defendants motion to dismiss with prejudice.

There is no provision in law that permits a *pro se* attorney Plaintiff to blow by two Court set deadlines over a course of two months—without even an utterance to the Court or Defendants as to his intentions, in violation of the Local Rules and courtesy to the Court—and then to prolong the inevitable for another three months.

As demonstrated in Defendants' motion to dismiss, as well as the several other motions to dismiss and motions for sanctions filed by the other defendants in this action, Plaintiff's claims are wholly frivolous and without merit. If Plaintiff wished to proffer a hint of veracity in making this present application, he should have submitted his letter before, or at least contemporaneously with, the Court extended August 10 deadline. However, as it stands, Plaintiff's first communication to the Court and to Defendants occurs after the passing of two months and two deadlines.

Moreover, Defendants think it not necessarily coincidental that Plaintiff marshals this effort for an additional extension through the reelection campaign for Albany County District Attorney David Soares, making this matter history no earlier than after the 2012 general election. Soares' 2007 indictment of Plaintiff for alleged embezzlement, coupled with the litigation onslaught between Plaintiff O'Hara and NXIVM/Bronfmans, has served as fodder for the media. The filing of Plaintiff's latest frivolous lawsuit has certainly been no occasion for the media to relent in its frenzy, but a reason to agitate all the more. The dismissal of this suit is the equitable remedy for a plaintiff who has cavalierly abused the legal process.

For the forgoing reasons, Defendants request that the Court reject Plaintiff's petition for extension and grant Defendants' motion to dismiss with prejudice.

Thank you for your consideration in this matter.

Sincerely yours,

/s/  
Adam G. Giangreco  
Assistant County Attorney  
Bar Roll No. 517518

August 14, 2012

ALBANY COUNTY

AUG 15 2012

Hon. Randolph F. Treece  
United States Magistrate Judge  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway  
Room 314  
Albany, NY 12207

ATTORNEY'S OFFICE

**RE: O'Hara V. Ranieri Et Al  
Civ. No. 12-252 GLS/RFT  
(Request To Postpone All Proceedings)**

Dear Judge Treece:

Because of the various medical problems that I have been dealing with for the past several months, I have been unable to respond, in a timely and/or appropriate manner, to a variety of issues concerning the above-referenced matter. As a result, I am hereby requesting a postponement in all proceedings in this matter for a period of ninety (90) days.

I will be happy to provide you with a copy of my primary care physician's synopsis of my recent and current medical problems – and the applicable treatment plan regarding same. Due to the highly confidential nature of that information, however, I would request that its contents not be shared with any of the other parties in this matter.

Thank you for your consideration.

Sincerely,

*Joseph J. O'Hara*

Joseph J. O'Hara

cc: Damon Morey Law Firm  
Albany County Attorney's Office  
John P. Bartolomei & Associates  
Breedlove, Knoll Law Firm  
O'Connell & Aronowitz Law Firm  
Proskauer Rose Law Firm