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December 22, 2011

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2011 DEC 23 P 12: 52

CHAMBERS  
CHARLES S. HAIGHT, JR.  
U.S. DISTRICT JUDGE

Honorable  
Charles S. Haight, Jr.  
District Judge  
U.S. District Court  
141 Church Street  
New Haven, CT 06510

Re: Ethan Book Jr. v. Robert Mendoza and  
the Clint Independent School District,  
Case No. 3:07-cv-1468-cv (CSH)

Dear Judge Haight:

With reference to this Court's ruling of January 5, 2011, for good and lawful causes, I hereby respectfully request permission of this Court to present a Rule 60(b) motion to reopen judgment.

This Court's ruling of February 5, 2009 concluded to dismiss this lawsuit for lack of personal jurisdiction (#71). With reference to the Connecticut Long-Arm Statute, Sec. 52-59(a), a consideration of the issue of personal jurisdiction is minimum contacts. Notwithstanding that I believe that I reasonably described the required factors for establishing personal jurisdiction, and despite good faith diligent efforts made by me prior to and following the issuance of this Court's ruling regarding information and references which might support that this Court does, in fact, have personal jurisdiction in this matter, through yet additional efforts I recently learned that the usual procedure for a transfer of a student from the Bridgeport school system to another school district is for the school district to which a student seeks to transfer to make a specific direct request to the Bridgeport school system. This additional supporting information is of substantial importance to focal issue of this matter and is determinative of the existence of minimum contacts for this Court's jurisdiction.

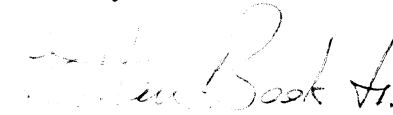
In addition, this factor, one of which the opposing counsel either knew or should have known when it presented its Motion to Dismiss (#23), adds additional substance to my claims in this matter of lack of professionalism and lack of cooperation by the opposing counsel [See my unaddressed Motion for Rule 11(b) Sanctions (#49) including claims of lack of professional cooperation by opposing counsel regarding discovery, case management planning and communication; and with on-going implications for an opposing counsel pattern of presenting misleading arguments in pleadings both before this Court and before the Second Circuit Court of Appeals.].

Further, this additional, relevant information adds significance to this Court's action of April 7, 2008 to waive the usual pre-filing conference "[i]n light of the plaintiff's *pro se* status", of the failure to this Court to have addressed my Motion for Rule 11(b) Sanctions and for Temporary Suspension of Order on Pretrial Deadlines (#49), of this Court's failure to have allowed oral arguments on substantive pleadings, of this Court's action of ruling to dismiss for lack of personal jurisdiction before allowing discovery and further of the value of other factors of satisfaction of the minimum contacts requirement, both in the letter and the spirit of the law, which I early provided this Court in this matter.

On the afternoon of December 21, 2011, I sent an e-mail message to Attorney Bret Woodis regarding this additional information. I particularly requested his review and comments. As of the preparation of this letter, I have received no response.

For all the above, there are proper lawful causes for this Court to grant permission for me to present a Rule 60(b) motion to reopen judgment.

Sincerely,

A handwritten signature in cursive script that reads "Ethan Book Jr.".

Ethan Book Jr.

c: Bret Woodis,  
Winget, Spadafora & Schwartzberg  
Stamford, CT