

**MICHAEL HAYDEN SANFORD**  
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February 25, 2021

VIA ECF  
 Honorable Denise L. Cote, U.S.D.J.  
 U.S. Courthouse, Southern District of New York  
 500 Pearl Street, Courtroom 18B  
 New York, New York 10007

**MEMO ENDORSED**

**Re: Letter Motion to redact and seal an exhibit for Sanford's response to Berry [ECF 381]**  
***Knopf et al. v. Esposito et al., Case No. 17-cv-5833***

Dear Judge Cote:

I am a self-represented former party and ongoing witness in both *Esposito* and *Phillips* and request an order that the Court (i.) permit me to file the attached Exhibit One in redacted form (highlighted section redacted); and (ii.) the Court shall seal the un-redacted version. I will attach the redacted exhibit to my response to Berry's Ltr. [ECF 381] which claims he has not victimized me through litigation misconduct. I wish to establish that as recently as within the past two weeks Berry sent me other emails (which I will not redact), that *reference specific words that I ask be redacted*, which caused me to "b.) refrain from opposing discovery motions seeking confidential material from other non-parties." [ECF 380, p1].


Hence, a protective order that merely limits Berry's spoken words to me *would do nothing* to prevent his *more heinous written communications* to me and third parties.

The requested redaction and sealing order is necessary to avoid "scandalous or prejudicial" material from being "unnecessarily inserted" into a record (*Soumayah v. Minnelli, 41 A.D.3d 390, 392* (1st Dep't)). I submit that this was the extortive and harassing intent of Berry's email to me and third parties. The attached email, which he sent to my neighbors in Montauk (when Berry - obsessed with me - saw on a litigation service that I had a dispute with them about their cutting down trees on my side of our property line), and then forwarded to me, *is illustrative of innumerable additional communications*, some of which I intend to attach as exhibits to my Motion for a protective order and sanctions, that contain scandalous, unproven, untried and never prosecuted alleged claims. Berry received detailed rebuttals demonstrating that this *never occurred*. Upon information and belief, Berry, in whole or in part, fabricated what he constantly threatens to disclose - - just to maliciously distract me - - *typically when I have discovery compelled to be released to the Knopfs or opposition papers due against the Knopfs*. I will likely include a table in my Motion showing how his threats coincided with these due dates.

For the above reasons, I respectfully request the Court grant this application.

By my signature below and pursuant to 28 U.S.C. §1746, I, Michael Hayden Sanford, certify today, February 25, 2021, that the foregoing is true and correct under penalty of perjury.

The proposed redactions are approved.  
 2.25.21

  
 DENISE COTE  
 United States District Judge

Respectfully submitted,



Michael Hayden Sanford  
*Pro Se non-party witness*

cc: Parties in *Esposito* and *Phillips* via ECF; DANY, non-party witnesses James M. McGuire, Esq., Daniel Goldberg, Esq. and Matthew Bronfman, Esq. via email

# **EXHIBIT ONE**

**From:** Eric Berry <[berry\\_awp\\_c@gmail.com](mailto:berry_awp_c@gmail.com)>  
**Date:** May 13, 2019 at 7:47:55 PM EDT  
**To:** Michael Hayden Sanford <[mhs@sanfordpartners.com](mailto:mhs@sanfordpartners.com)>, Erro margo n <[erro\\_margo\\_n@ao.com](mailto:erro_margo_n@ao.com)>, Dan Osborn <[DOsborn@osbornawpc.com](mailto:DOsborn@osbornawpc.com)>  
**Subject:** Fwd: Harvest Moon Beach House (Michael Sanford) v. Bromberger

Eric W. Berry  
Berry Law PLLC  
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----- Forwarded message -----

**From:** Eric Berry <[berry\\_awp\\_c@gmail.com](mailto:berry_awp_c@gmail.com)>  
**Date:** Mon, May 13, 2019 at 7:43 PM  
**Subject:** Harvest Moon Beach House (Michael Sanford) v. Bromberger  
**To:** <[arubac.b@ao.com](mailto:arubac.b@ao.com)>

Ms. Bromberger -

My clients, Michael and Norma Knopf, are involved in several lawsuits with Michael Sanford, who resides at 23 McKeney Road, Montauk, which he owns through Harvest Moon Beach House, LLC.

I am attaching 4 documents concerning Mr. Sanford. One is a summons he filed, which I located when I did a routine search, against you Steven Bromberger. [REDACTED]  
[REDACTED] Finally, a ruling in a foreclosure case in which states that he made no payments on the 23 McKeney Road residence for 9.5 years. Another is a report by the New York Office of Court Administration about how he tried to become a court attorney.

Please do not hesitate to call me if you have any questions

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