

May 9, 2019

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The Honorable Jose L. Linares
Chief Judge
United States District Court
District of New Jersey
50 walnut Street #4015
Newark, NJ 07102

Re: Patel v Crist, et al
Docket No. 19-CV-08946 – P1
Patel v Allstate, et al
Docket No. 19-CV-09232 – P1

For reference purposes:
Kaul v Christie: 16-CV-02364 – K1
Kaul v Christie: 18-CV-08086 – K2
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Linares,

We write this letter to bring to the Court's attention, that on May 8, 2019, a motion for the judicial disqualification of Judge Kevin McNulty was filed in K1 + K2, and that this therefore precludes Judge Kevin McNulty from any further involvement in the case, be it administrative, ministerial, or judicial.

It is also our position, as is similarly stated in 'The McNulty Disqualification', that Judge McNulty is conflicted, as he and his law firm, K3 defendant, Gibbons, PC, remain commercial beneficiaries of the defendants. We believe that this conflict is evidenced by the fact that the cases, after having been transferred on March 25, 2019 to the United States District Court for

the District of New Jersey (D.E. 22), and assigned to Judge Freda Wolfson, were then, on March 27, 2019, transferred to Judge Kevin McNulty. The Court provided no reason to justify this transfer, and we respectfully assert that the purpose is exactly that detailed in 'The McNulty Disqualification' i.e. judicial corruption + bribery.

Judge McNulty, since having the cases come under his remit, has not, as the law requires, disclosed to either us, the record or the Court his financial disclosure statement, or indeed his conflicts of interest, past or present. We consider this to be evidence that he is in fact conflicted, and is thus prohibited from any further involvement in the cases.

We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third-degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh + Pizzi + O'Really + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2.

We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.

In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the "**politico-legal**" nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of justice to have any of the above cases litigated in any court, within the geographic boundaries of New Jersey. At the heart of these matters are located state actors, state agencies and the state itself, the interests of which are interminably intertwined with the interests of New Jersey lawyers + state judges + New Jersey based federal judges. Simply, as a point of historical interest, the untenability of such a situation was recognized in Spain, after the fall of Franco, when members of the Guardia Civil and Spanish federal judiciary were assigned to provinces in which they had no connections with the local community. This remains the case today, and for good reason, and it was because of this political impartiality that it was a Spanish Judge, Baltasar Garzon, who had General Augusto Pinochet arrested, in 1998, in London for his crimes against humanity. This is the standard to which all jurisprudence should compare itself.

With regards to crimes against humanity, K2 defendant, Christopher J. Christie is no stranger (D.E. 296-11 Page 6973).

It is thus therefore, proper and consistent with the interests justice to have the above cases adjudicated in district courts not within the geographic boundaries of New Jersey, and we would respectfully request that you transfer P1 + P2 back to the United States District for the Northern District of Georgia, no later than May 22, 2019.

We thank you for your attention to this matter.

Yours sincerely

Dr. Harshad Patel

cc: All Counsel of record
Clerk of the Court

R. Kaul

Richard Arjun Kaul, MD