

August 19, 2012

Hon. Gary L. Sharpe, Chief Judge
United States District Court for the
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Room 112
Albany, NY 12207

RE: O'Hara V. Raniere Et Al
Civ. No. 1:12-CV-00252 GLS/RFT

Dear Judge Sharpe:

I have received and reviewed a copy of the August 16, 2012 filing by Defendants P. David Soares and Albany County in this matter – and wish to respond to some of the misleading claims and statements in same. In this regard, I ask that the Court take into consideration the following factors in considering my original request for a ninety (90) day extension with respect to all proceedings concerning this matter:

- Notwithstanding the above-referenced Defendants' baseless assertions to the contrary, the only reason why I have not been able to respond, in a timely and appropriate manner, to the pending motions in this matter is because of the various medical problems that I have been dealing with for the past several months. In this regard, I will be forwarding to the Court, for its *in camera* review only, a copy of my primary care physician's summary of these medical problems – and the current treatment plan concerning same (Note: As indicated therein, I will undergoing surgery tomorrow).
- The suggestion that my request for a 90-day continuance is somehow tied to the upcoming election regarding the position of Albany County Attorney is totally absurd – and, once again, not supported by any facts. In this regard, I am not involved, in any capacity, with any candidate for that position – and am no way responsible for the fact that Defendant Soares and several members of his immediate family chose to become involved with the NXIVM cult.
- With respect to the Defendant Albany County, it should be noted that its primary legal representative, Albany County Attorney Thomas Marcelle, previously agreed to represent me and another victim of the NXIVM cult's legal machinations – and, in that capacity, was provided with detailed information that had been gathered concerning the cult and some of its operations. The fact that Mr. Marcelle has chosen not to recuse himself in this matter is an issue that I intend to raise when I able to file a detailed reply to Albany County's filings.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Joseph J. O'Hara". The signature is written in a cursive, somewhat stylized font.

Joseph J. O'Hara

PS/As soon as I am able to do so, I will resume my attempt to find an attorney to represent me in this matter.

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

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

JOSEPH J. O'HARA,

PLAINTIFF

v.

Civil Action No. 1-12-CV-0252
(GLS/RFT)

KEITH A. RANIERE
A/K/A "VANGUARD" Et Al,

DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2012, I filed a RESPONSE to the LETTER REQUEST MOTION that was filed on August 6, 2012 on behalf of the Defendants P. David Soares, Albany County District Attorney, and Albany County whereby they sought to have the Plaintiff's request for a ninety (90) day continuance in this matter denied. I further hereby certify that I have mailed, via the United States Postal Service, a copy of the above-referenced document to each of the following:

Albany County Attorney's Office
Department of Law
112 State Street
Room 1010
Albany, NY 12207

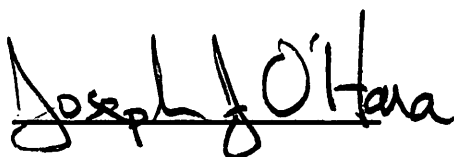
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Niagara Falls, NY 14303-1232

Breedlove and Knoll, LLP
10 Maxwell Drive
Suite 105
Clifton Park, NY 12065

Damon Morey, LLP
200 Delaware Avenue
Suite 200
Buffalo, NY 14202

O'Connell & Aronowitz, PC
54 State Street
Albany, NY 12207

Proskauer Rose, LLP
11 Times Square
New York, NY 10036

A handwritten signature in black ink that reads "Joseph J. O'Hara". The signature is written in a cursive style with a horizontal line drawn through the middle of the name.

Joseph J. O'Hara
***Pro Se* Plaintiff**

August 19, 2012