



INTERNATIONAL ASSOCIATION OF DEMOCRATIC LAWYERS

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August 31, 2020

Clerk of the Court
United States Court of Appeals
Thurgood Marshall, U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: **Judicial Complaint regarding SDNY District Court Judge Lewis Kaplan**

Dear Clerk:

The undersigned, Jeanne Mirer, President of the International Association of Democratic Lawyers (IADL), and Natasha Lycia Ora Bannan of the National Lawyers Guild (NLG), file this complaint for judicial misconduct against District Court Judge Lewis A. Kaplan of the Southern District of New York. We file along with 37 bar and legal organizations and 205 individual lawyers who have read and endorsed the complaint (hereinafter "Complainants"). Complainants file this complaint pursuant to the Judicial Conduct and Disability Act of 1980, 28 U.S.C. § 351-364. The judicial complaint arises out of Judge Kaplan's handling of litigation in the matters of *In re Chevron*, 10-mc-00002 and *Chevron v Donziger et. al.*, 11-cv-0691 over the last ten years.

The Complainants are aware that the Second Circuit has had occasion to rule on many appeals in both these matters. Currently pending before the Circuit is a writ of mandamus, as well as an appeal to orders that are the basis for civil and criminal contempt charges against Mr. Steven Donziger. Complainants ask for a special investigating committee based on the charges herein.

This complaint is supported by an Appendix with supporting exhibits which sets forth the facts referenced in the complaint. The undersigned and the institutions we represent are not counsel for any party in either of the legal actions, nor are we parties. IADL and NLG are bar associations that have been following these cases, along with many Complainants, and both organizations filed an amicus brief in support of the current mandamus petition. Additionally, the undersigned are admitted to practice in the Southern District of New York and the Second Circuit.




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The undersigned declare under penalty of perjury that the statements made in this complaint are true and correct to the best of their knowledge.



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