

Exhibit B

**Richard A Dollinger
Request to Recuse**

Michael Markham

1010 Front Street B101
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18 September 2018

RE: Markham V Markham Index #2015/09826

Hon. Richard A. Dollinger

Presiding Justice, Matrimonial Part, 7th Judicial District
Hall of Justice
Rochester, NY 14614

Dear Judge Dollinger:

While I understand that you are a person of integrity and honor, it has recently come to my attention that your relationship with the Plaintiff (unknown to Defendant) poses a significant conflict of interest in your continuing to preside over our matrimonial dispute. Due to Plaintiff's decades long relationship with your family, I am of the strong opinion that your continued involvement poses a serious concern for all parties involved getting a fair and unbiased result in your future rulings on our divorce.

As I am certain you are aware Plaintiff, Diane Markham is decades long friend of your brother Andrew and is a lifelong friend of your sister-in-law Virginia Blackwell. In fact we have several times been the overnight guest at the home of your Mother, at her home on Canandaigua Lake. As you may be aware the Plaintiff also knows your nephew Drew fairly well. Further, the Plaintiff has 'back channel' called on you before when you were the Brighton Town Judge regarding a neighbor dispute we had when we lived on Landing Road South. Until now, I had no idea that you were an Acting Supreme Court Judge and were Andrew Dollinger's brother, Drew's Uncle, Virginia Blackwell's Brother-in-Law and the departed Robert Wegman's step son.

As you are aware, in spite of flying back from Hawaii several times I have always been excluded from your Courtroom including at my own contempt hearing on December 1, 2017. Had I been allowed in your courtroom I would have immediately know that you were Andrew's brother and asked for a different less conflicted Judge.

I would respectfully ask that you immediately recuse yourself and ask that the Court assign another Judge to hear our case in December.

Thank you for your prompt attention to this matter.

Sincerely,



Michael Markham

cc: Greg Mott, Esq., Sharon Sayers, Esq., Maureen Pineau Esq., PJ Ed Riley Esq., Diane Markham (Plaintiff), Joel Edelman, Esq., NYS Commission on Judicial Conduct.

RAD

KRU

**STATE OF NEW YORK
SUPREME COURT - COUNTY OF MONROE**

Diane R. Markham (DeLong),

Plaintiff,

v

**ORDER TO
SHOW CAUSE**

Michael D. Markham,

Defendant

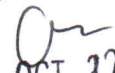
Index No. 2015/9826

Upon reading and filing the annexed Affidavit of Michael D. Markham, the Defendant in this action, sworn to on October 9, 2018 together with all other exhibits and papers attached to this Order to Show Cause:

RAD

Let the Plaintiff, Diane Markham, show cause before a Special term of this Court to be held at 9:30 am/pm on the 16 day of November 2018, why an Order should not be made and entered granting the following relief: 16:30

- A) Granting to movant an immediate Order of Divorce with all financial liability to the Plaintiff based on the widespread fraud perpetrated on this Court by the Plaintiff and her Counsel:
- B) Granting to movant immediate physical custody of the children due to former and ongoing fraud perpetrated on this Court which by law vitiates all prior, current, and future litigation before this Court on this matter:
- C) Granting to movant immediate visitation of the children during pendency of this action based on Plaintiff's and AFC's fraud before this Court:
- D) Granting to movant temporary child support pursuant to the guidelines set forth in the Child Support Standards Act:
- E) Granting to movant temporary spousal support and the return of all spousal support paid since December of 2017 due to the Plaintiff and her Counsel defrauding the Court and movant based on the false testimony of the Plaintiff and Counsel regarding Plaintiff's income and businesses:
- F) Granting to movant an award for reasonable attorney's fees from Plaintiff based on Plaintiff's fraud and ongoing litigation through no fault of the Defendant:
- G) Granting to movant an Order for immediate change of venue for determination of custody of the children to the appropriate jurisdiction of Maui County - Hawaii where the children were undisputed residents at the commencement of these proceedings:
- H) Granting to movant an Order to move Defendant's stolen Bank of Hawaii disability funds from Mr Ingersoll's trust account to an FDIC insured trust account managed by him. Plaintiff's Counsel has already attempted to place a personal lien on Defendant's stolen trust assets for debts incurred solely by Plaintiff even though they are not her assets:
- I) Granting to movant such other and further relief as the Court may deem as just and proper:

COMPUTER ENTRY COMPLETED

 OCT 22 2018
 MONROE COUNTY
 SUPREME & COUNTY COURT

RECEIVED
 OCT 11
 PM 3:42

RECEIVED

RAB

Let the Attorney for the Children (AFC), Edward W. Riley, Esq., show cause before a Special term of this Court to be held at 9:30 am/pm on the 19 day of November 2018, why an Order should not be made and entered granting the following relief: 16h

- A) Granting movant an immediate Order to Disqualify, disqualifying and removing Mr Riley as the AFC for his children due to his long term and significant never disclosed conflict of interest. The recent reveal of Mr Riley's conspicuous conflicting interest to his lifelong friend, the children's grandfather, is clearly subordinating the legal rights, wishes, and interests of the Defendant's children, specifically their legal right to unbiased and unconflicted representation and counsel:
- B) Upon his removal, granting to movant an Order for the immediate return of all retained monies Mr Riley has fraudulently received from Defendant provided in good faith to provide fair and unbiased representation to his children prior to the exposure of Mr Riley's deceitful nondisclosure of his significant long term conflict:

RAB

Let the Attorneys for the Defendant, Gregory Mott, Esq., and Sharon Sayers, Esq., show cause before a special term of this Court to be held at 9:30 am/pm on the 19 day of November 2018, why an Order should not be made and entered granting the the following relief: 16h

- A) Granting movant an immediate Order discharging Gregory Mott, Esq., and Sharon Sayers, Esq., as attorneys for the Defendant due to their conspicuous and flagrant breach of their legal duty to their client the Defendant in almost every conceivable way to breach legal agency possible:

Let the Honorable Richard A. Dollinger, show cause before a special term of this Court to be held at _____ am/pm on the _____ day of _____ 2018, why an Order should not be made and entered granting the following relief:

- A) The movant would humbly and respectfully ask the Honorable Judge Dollinger to recuse himself of any further participation in this case due to a significant conflict of interest that has just come to light by way of the Plaintiff's decades long close relationship with the same Dollinger family. Movant would respectfully ask His Honor to request that the Court assign an alternative less conflicted Judge to hear this case if he is not prepared to immediately rule in favor of Defendant on all issues due to the nullification of all of the Plaintiff's past and future testimony due to Plaintiff's and her Counsel's overwhelming fraud before this Court as required by law:

SUFFICIENT REASON APPEARING THEREFOR,

ORDERED, that service of a copy of the Order to show Cause, the affixed Affidavit of the Defendant and all attached exhibits be made by personal delivery upon all named parties, including Maureen Pineau, Esq., the Attorney for the Plaintiff on or before October 22, 2018 be deemed good and sufficient service.

Responding Papers Due ~~ENTER~~ 11/9/18 RAB

[Signature]
Hon. Richard A. Dollinger
Justice of the Supreme Court