

ROCKLAND COUNTY BAR ASSOCIATION

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Jeanmarie DiGiacomo—Editor



From the President

"You say 'goodbye' and I say 'hello' . . ." *Sir Paul McCartney*

In case you haven't heard, on June 30, our immediate past president Laurie Dorsainvil, said "Goodbye;" (only to that position), and I now say "Hello" to our membership as the Association's new president. Laurie's goodbye, isn't really a goodbye at all. As promised, she is continuing as a member of our Board of Directors and will still be an active participant on our DEI and CLE committees.

If you're old enough to remember the Beatles appearing on Ed Sullivan's ("really big") Show, (see above), my inaugural remarks aren't addressed to you (I'll get to you later.) In this first message, I mean to enlist our newer and, perhaps, less experienced members to join with us in helping to advance the Rockland County Bar Association's mission and message well into the future. I assure you that our current Bar leaders welcome your energy, enthusiasm and optimism to bring a real sense of community within the legal profession through your professional *and* personal interaction with other lawyers. To this day, some of my dearest (and, at this stage of my life, oldest) friends have been – and still are – members of the Bar and Bench. You are invited to join one or more RCBA committees; attend a social function, (there's the annual dinner coming up in October), and keep your CLE credits current with the Association's varied (and free to members) virtual continuing legal education programs during the year.

Get involved. And, if you're already involved, *please* stay involved!

A brief note about CLE. If you have a topic or area that you believe can serve for an interesting legal ed program, by all means I urge you to communicate your ideas to Veronica or Jean Marie at the RCBA offices, (or me), and we will forward them to the CLE committee. You may even consider presenting an on-line CLE for the Association, which is a great way of sharing special knowledge or expertise on a particular subject or area of practice with your colleagues.

I end this initial missive pretty much as I started, that is by thanking my predecessor for her impressive and caring stewardship of our Association over the past year; and I hope that, during my own term, I can emulate – to some small measure – Laurie's intellect, class and kindness.

Cape May, N.J.

July 26, 2025

Respectfully,

Richard A. Glickel

rglickel@glickelaw.com

THE PRACTICE PAGE

CONVERTING JUDGMENTS RENDERED IN A FOREIGN CURRENCY:

THE VALUE OF THE BENJAMINS MATTERS

Hon. Mark C. Dillon *

Judiciary Law 27(b) provides in its first sentence that “[i]n any case in which the cause of action is based upon an obligation denominated in a currency other than currency of the United States, a court shall render or enter a judgment or decree in the foreign currency of the underlying obligation.” That seems straightforward enough, that disputes denominated in a foreign currency result in a money judgment in that same currency. A yen for a yen, a euro for a euro. Yet, a competing subdivision of the same statute, Judiciary Law 27(a), says that in state actions, the judgment must be recorded in U.S. dollars as well as in the foreign currency. In other words, having established that the foreign currency amount is what ultimately controls the judgment, state law requires that the equivalent dollar amount also be stated anyway.

A complicating factor for the bench and bar in drawing judgments in both foreign currency (when applicable) and U.S. dollars involves the issue of what date should be used for calculating the currency conversion. In contract actions, should the conversion be calculated based on the relative value of the U.S. dollar against the foreign currency as of the date of the *breach*? Or, should it be calculated as of the date of the judgment for which a New York conversion is sought? Or should it be the date of the actual conversion in New York? The answer matters. Currency values fluctuate against each other from day to day. The value of the U.S. dollar relative to other currencies constantly adjusts up and down, and differently from currency to currency. Over time, currency fluctuations may be meaningful and may reflect longer-term trends. For high-value judgments, even a minor fluctuation of relative currency values may translate into a significant sum of money. For this reason, use of either the “day-breach rule” or the “judgment-day rule” matters to the parties, whether one party wishes to maximize the dollar value of its recovery or another party wishes to minimize the dollar value of its upcoming payment.

This is where the statute kicks in again. Judiciary Law 27(a) and (b), when read together, require that the dollar amount of a judgment be based on the prevailing exchange rate in effect as of the date of the New York judgment. More specifically, the operative conversion date is the date the New York judgment is executed by the court, and not the later date that the judgment may be entered with the clerk. This is particularly true where the action is based on an obligation denominated in a currency other than the U.S. dollar (*Petersen Energia Inversora, S.A.U. v Argentine Republic*, 2023 WL 2746022 (SDNY 2023) [Preska, J.]). The reference to the “judgment” in Judiciary law 27(b) has not been interpreted by the state Court of Appeals and is the subject of some ambiguity, as the Second Circuit interprets it as referring to the interlocutory or final determination of the rights of a party, such as the date a party is awarded summary judgment on its claim (*Rienzi & Sons, Inc. v Puglisi*, 638 Fed.Appx. 87 [2nd Cir. 2016] [applying the language

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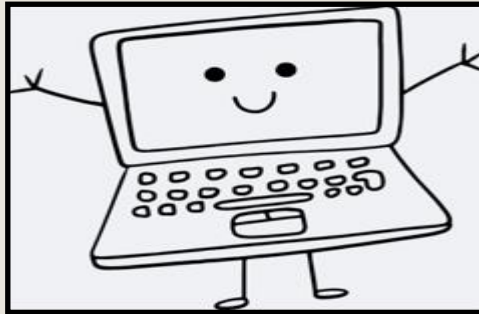
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of CPLR 5011]). In any event, the conversion itself is a simple mathematical computation, taking the foreign currency amount that is determined first, and applying the exchange rate to determine its equivalent value in U.S. dollars as of the operative date. The price of bitcoin, gold, silver, or oil per barrel is not relevant. The applicable exchange rate is easily obtained from reliable public sources that are published on a daily basis. Those exchange rates are subject, in effect, to judicial notice by the court (*Nature's Plus Nordic A/S v Natural Organics, Inc.*, 78 F.Supp.3d 556 [EDNY 2015] [applying New York law]; CPLR 4511[b]).

New York State's judgment-day rule is different from the day-breach rule used in some, but not all, of the cases seen in the federal courts. In federal courts, use of the day-breach rule or the judgment-day rule is affected by whether an action is or is not based upon the diversity of the parties' citizenship. The Second Circuit has explained that where there is diversity of citizenship, the federal courts must apply the rule of the state in which the federal court sits (*Vishipco Line v Chase Manhattan Bank, N.A.*, 660 F.2d 854 [2nd Cir. 1981]), which in New York is the judgment-day rule of Judiciary Law 27. But in non-diversity actions, such as those involving federal securities laws or treaties, or where pendant jurisdiction is asserted, federal law takes control of the issue (*Id.*). The federal approach is the breach-day rule for foreign currency-denominated claims which arise within the United States, but the judgment-day rule for foreign currency-denominated claims that arise within the foreign country (*Shaw, Savill, Albion, & Co., Ltd. v The Fredericksburg*, 189 F.2d 952 [2nd Cir. 1951]; *Mitsui & Co., Ltd. v Oceantrawl Corp.*, 906 F.Supp. 202 [SDNY 1995]). Yes, the federal court approach is multi-layered and complicated. In instances in which the breach-day rule is applied, where the breach might have occurred many years earlier, the difference in currency values from a present-day conversion might be palpable, whether in favor of the plaintiff or the defendant. Chips fall where they may.

On this issue, the value of the Benjamins matters.

Mark C. Dillon is a Justice of the Appellate Division, 2nd Dept., an Adjunct Professor of New York Practice at Fordham Law School, and a contributing author of CPLR Practice Commentaries in McKinney's.



Tips for Technology

Your Google Business Profile & AI

If you've Googled anything lately, you've probably noticed AI-generated summaries showing up at the top of the page. These "AI Overviews" are changing how people search for services, legal or otherwise. In March 2025, AI Overviews appeared in over 13% of all U.S. desktop searches, nearly doubling since January.

These summaries aren't just pulling from websites. Google has confirmed that AI Overviews rely on trusted sources across the internet, including Google Business Profiles (GBP). That means your profile isn't just a directory listing anymore, it's a potential source for what Google's AI shows users first when they search for legal help.

For law firms, that's a big deal.

Is Your Google Business Profile Helping Your Firm?

As a marketer, I've seen TONS of Google Business Profiles, and most are incomplete. It's frustrating, especially when your Google Business Profile is free and can be an incredibly powerful tool. Many firms list only their name and maybe a logo (and sometimes not even that). But I commonly see missing:

- Practice areas under **Services**
- Photos or other visuals
- Client **Reviews**
- A filled-out **Q&A** section
- Post News or Blog articles in you "Updates"

These aren't just nice-to-haves anymore, they're useable data that Google may use to decide if your firm shows up in AI-driven search results.

Good News: Updating It Is Easy

The good news? You don't need to hire anyone to optimize your profile, you just need to log in and take a few minutes to fill things out.

1. Go to business.google.com and sign into your profile.

Continued....

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Another feature many firms overlook is the "Updates" or "News" section in their Google Business Profile. This area lets you post short articles, announcements, or blog-style updates directly to your profile. It's a great way to show potential clients (and Google) that your firm is active, current, and involved in your practice areas. Regular updates can give Google more context for both search rankings and AI summaries. If you're already writing blog content for your website, you can repurpose it here with a quick summary and a link.

Small Changes, Big Impact

These are simple updates to make, but they can have a serious impact on your visibility and credibility online. If your profile is incomplete or out of date, now's the time to fix it.

So what are you waiting for? Go get started.

Sources Used:

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<https://xponent21.com/insights/ai-overviews-now-dominate-search-results-why-your-seo-strategy-needs-a-major-upgrade/>

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<https://blog.google/products/ads-commerce/google-search-ai-brand-discovery>

Sean Gough

Rockland County-based Marketing Strategist for Attorneys



COMMERCIAL LITIGATION ISSUES OF INTEREST

Submitted by Joseph Churgin, Esq. and Susan Cooper, Esq.*

Your client, a lender, is owed money on a loan made to an LLC. The loan was personally guaranteed by an individual. You commenced an action against both the LLC and the individual guarantor for the \$30,000 balance owed on the loan after the defendants defaulted. The answer filed by the defendants' attorney denied the allegations in the complaint and asserted a score of affirmative defenses. The action was eventually settled by a written agreement signed by you on behalf of your client and by the individual defendant on his own behalf and on behalf of the defendant LLC. After the defendants defaulted on the settlement agreement, you moved pursuant to CPLR 3215(i) to enter judgment for the amount demanded in the complaint.

Will your motion to enter judgment be granted?

The answer is *no*.

In *Silverline Services, Inc. v. Mob Transport, LLC*, 86 Misc.3d 1225(A) (Sup. Ct. Kings Co. June 16, 2025), Case No. 533231/2023, Plaintiff Silverline entered two agreements in June of 2023 to purchase Defendant Mob's future receivables at a discounted value in exchange for cash. Silverline was authorized to make daily withdrawals from Mob's bank account until Silverline received \$37,057.14 under the first agreement and \$8,874 under the second agreement. Mob's performance was personally guaranteed by Defendant Witherspoon. Mob defaulted, leaving a balance due of \$25,617.14 on the first agreement and \$7,035.60 on the second agreement.

In November of 2023, Silverline sued Mob for breach of contract and unjust enrichment, and sued Witherspoon under the personal guarantee. The defendants promptly filed a joint answer through their counsel in December 2023, denying the allegations and asserting 34 affirmative defenses. Seven months later, Silverline's counsel filed a "settlement agreement" signed by Silverline's counsel and by Witherspoon individually and on behalf of Mob.

After the defendants defaulted on the payments required under the agreement, Silverline moved for judgment for the amount in the complaint pursuant to CPLR 3215(i), which provides for entry of a default judgment by the clerk of the court upon the filing of the stipulation of settlement with an affidavit of non-compliance. Notably, no motion is required.

Nonetheless, the motion was made. The Court denied the motion, holding that the agreement was unenforceable based on violations of CPLR 2104, CPLR 321(a), and Rules of Professional Conduct rule 4.2(a).

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As to CPLR 2104, the Court observed, "A settlement agreement that is not made in open court 'is not binding upon party unless it is in a writing subscribed by him [or her] or his [or her] attorney or reduced to the form of an order and entered,'" quoting *Ebaid v. PV Holding Corp.*, 210 A.D.3d 741, 742 (2d Dep't 2022).

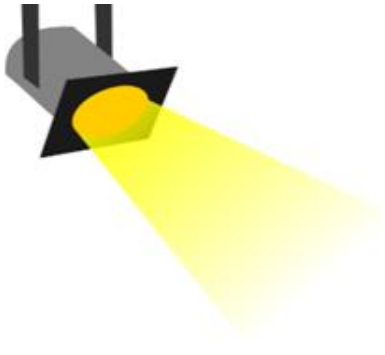
Since the settlement agreement was not signed by the defendants' attorney of record, the Court determined that the agreement violated CPLR 321(a). The Court reasoned, "If a party appears by attorney such party may not act in person in the action except by consent of the court," quoting *P.M. v. J.M.*, 84 Misc 3d 262, 265 (Sup. Ct. Westchester Co. 2024) (quoting CPLR 321[a]). Moreover, CPLR 321(a) provides, "a corporation or voluntary association shall appear by an attorney." There was no court consent to Witherspoon acting on his own without his attorney, and Mob could only act through its attorney.

Finally, "The 'Rules of Professional Conduct rule 4.2 (a) prohibits an attorney, in representing a client, from communicating "about the subject of the representation with a party the lawyer knows to be represented by another lawyer in the matter, unless the lawyer has the prior consent of the other lawyer or is authorized to do so by law"' (*Cepeda v. City of New York*, 211 AD 3d 570, 570-571 [1st Dep't 2022], citing Rules of Prof Conduct [22 NY-CRR 1200.0] rule 4.2 [a])." Defense counsel's affirmation in opposition was silent about why the agreement was signed by the individual defendant and not by counsel. The Court found, based on the four corners of the agreement, that Silverline's counsel executed the agreement directly with the individual defendant, although Silverline's counsel knew the defendants were represented by counsel.

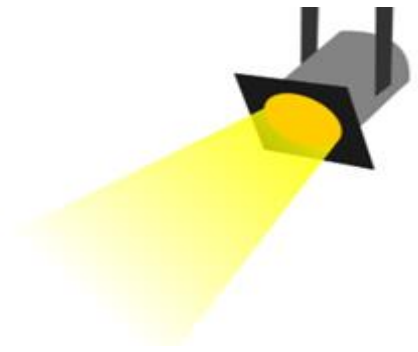
The motion was denied. The agreement was deemed inadmissible and unenforceable.

The lesson? When the opposing party is represented by counsel, settlement agreements must be signed by their attorney, not by the parties themselves, unless you obtain explicit court approval.

***By Joseph Churgin, Esq. and Susan Cooper, Esq. of
SAVAD CHURGIN, LLP, Attorneys at Law**



SPOTLIGHT



Candice Whatley, Esq.
Deputy Director of the Children's Rights Division
Legal Aid Society of Rockland County

Where did you grow up?

I've resided in Rockland County practically my entire life except for while I was away at college. I grew up in Spring Valley and I attended elementary, middle and high school in the East Ramapo Central School District. I'm a proud alumna of Ramapo Senior High School.

Current Hometown?

Currently, I live in Nyack with my husband and four beautiful children. My husband grew up in Rockland, as well. He is a Nyack High School graduate. Our families have resided in the county for many decades.

Where did you go to school/college/law school?

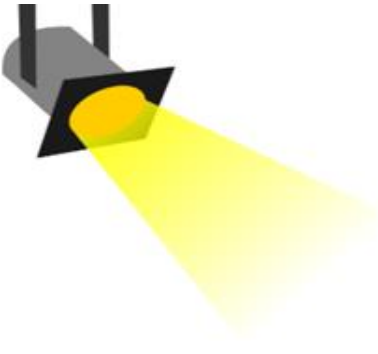
I earned my Bachelor of Art Degree in English, cum laude from the State University of New York at Albany. After completing my undergraduate studies, I went on to obtain my Juris Doctor Degree from The University of the District of Columbia David A. Clarke School of Law.

What is your current job/title?

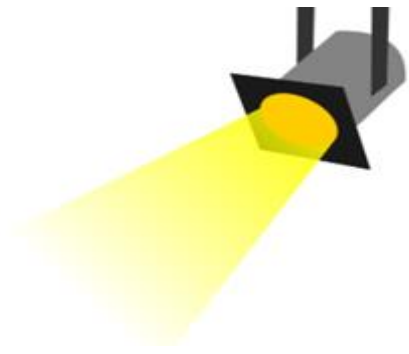
Currently, I am the Deputy Director of the Legal Aid Society of Rockland County Children's Rights Division where I manage the division's interdisciplinary team of attorneys, paralegals, social workers and student interns. The Children's Rights Division provides representation for children in family court matters.

What has been your career path?

Since I was about twelve years old, I knew I wanted to be a lawyer. I loved advocating on behalf of others. Even at a very young age, I could see the social and economic disparities that existed around me. It pained me to see others suffer and I could never just sit idly by. I always felt compelled to speak up and to try to make a difference. Becoming an attorney seemed like the best way to make an impact and effectuate change. So, as a high school student, I sought opportunities to explore my interest in pursuing a legal career and started to gravitate towards community work and community engagement. I elected to take a mock trial course and was connected through my high school career counselor to an externship with Blatt & Koppelman P.C. I enjoyed the externship program so much that I continued working with the firm as a Legal Assistant throughout the remainder of my high school studies. Then, during my undergraduate studies, I interned with the New York State Legislature for two semesters. I decided to apply for admission to law school and ultimately decided to enroll at the University of the District of Columbia David A. Clarke School of Law because it was well known for its clinical programs, its focus on public interest law and its provision of pro bono legal services. It was one of the best decisions I ever made; I would say it is where I learned the true



SPOTLIGHT



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value in advocating for underserved communities. While in law school, I had the opportunity to participate in the Community Development Law Clinic and the Juvenile and Special Education Law Clinic. I volunteered with a youth court diversion program and worked with the Public Defender Service of the District of Columbia Juvenile Justice Program where I advocated for youth who were detained or committed to detention centers within the metropolitan area. Over the summer breaks, I returned to Rockland and interned with the Rockland County Public Defender Service and with Judge William Nelson in the New York State Ninth Judicial District. My experiences during my undergraduate and law school studies guided my path towards a public interest legal career in child welfare and juvenile justice. After graduating from law school, I was thrilled to begin my career as an attorney working at the Legal Aid Society Juvenile Rights Practice in the Bronx. I started out providing representation in child welfare proceedings and eventually transitioned to a specialized project in education law and advocacy. After eleven years practicing in the Bronx, I accepted a position at the Legal Aid Society of Rockland County where I am currently the Deputy Director of the Children's Rights Division. It has been extremely rewarding to return to working and serving in my own community; the place I call home. One of my proudest accomplishments has been to expand the Children's Rights Division practice to include an Education and Community Advocacy Project to ensure that children have equal access to education by providing representation for children in education related matters. I find no greater reward than advocating for children and fighting for equal access to life's most basic necessities.

What is your favorite thing about Rockland?

The diversity – that's what makes Rockland a special place. After completing my collegiate studies outside of the county, I immediately returned to Rockland and started my family here. One of the main reasons I returned was because of the diversity that exists in the county. Growing up in Rockland, I lived, played, and went to school with friends and neighbors from many different backgrounds and walks of life. Those relationships have taught me to appreciate and embrace the strength and beauty in our differences. Over the years, I've seen the power in our community uniting around common causes and there is no doubt that our diversity is our strength. I would not be who I am today without the lifelong friendships and well-rounded perspective that I've gained growing up amongst my diverse family, friends and neighbors here in Rockland.

Who is your inspiration/hero?

My parents. They have always been my greatest supporters. They are the reasons why I believe in love, perseverance, selflessness, and hope for a better tomorrow. They have always given unselfishly to me, my family and our community. They have instilled in me the courage and character I've needed to try and make a difference in the lives of others. It is because of their example and support that I chose and was able to attend law school.

What good advice have you received?

Never give up – life will not always be easy, but we must persevere. Anything is possible with faith and hard work.

Favorite TV or Streaming Show/Book?

I can't think of just one favorite book or show. I love biographies, memoirs, biopics, and documentaries. I find inspiration in the life journeys of others.

What is your Guilty Pleasure?

Any kind of sweet treat.

Research Participants Needed: Juvenile Attorneys

There is a new study about the experiences of juvenile attorneys in the interrogation room to better understand how an attorney's presence might minimize false confessions. You are invited to complete an anonymous questionnaire to describe your experiences with juvenile offenders in the interrogation room for this study.

About the Study:

- Complete an Anonymous Questionnaire
- Questionnaire should take approximately 10-15 minutes to complete



REQUIREMENTS:

- 18 Years or older
- Juvenile Attorney practicing in the United States
- More than 5 (five) years of Professional Experience
- Participated in Juvenile Interrogations

Inquiries/Questions:

rosa.bowden-maccalla@waldenu.edu

This interview is part of the doctoral study for Rosa Bowden-MacCalla, a Ph.D. student at Walden University.

Please use the following **link or QR code** to complete the anonymous questionnaire:

https://qualtricsxm26c4mhg3f.qualtrics.com/jfe/form/SV_783afgNOpTh3cnY

You are welcome to forward it to others who might be interested and meet the above requirements.

Important Mental Health Advice That Can Help Any Lawyer

By: Stan Popovich

Many lawyers privately struggle with various mental health issues such as depression, anxiety, stress, and addiction and do not know what to do.

To make things even worse, some lawyers are afraid to ask for help because it could damage their reputation and create a mental health stigma among their peers, clients, and family members.

As a lawyer can you relate to the following?

- **High-stress environment:** The legal profession is known for its high stakes, demanding workload, and adversarial nature, leading to chronic stress.
- **Long hours and heavy caseloads:** Lawyers often work extended hours to meet deadlines and client expectations, resulting in burnout and exhaustion.
- **Competitive environment:** The competition within the legal field can create additional pressure to outperform colleagues and maintain professional standing.
- **Lack of work-life balance:** The demands of the job can lead to neglecting personal lives, exacerbating feelings of isolation and loneliness.
- **Stigma surrounding mental health:** A culture of silence and fear often prevents lawyers from seeking help for mental health concerns, viewing it as a sign of weakness.

In many situations a lawyer may just “deal” with these situations without addressing the negative toll it will have for their long term physical and mental health.

As a result, here are some mental health tips that a lawyer can use to get out of this vicious cycle.

1. Realize That You Have A Problem: The first step any lawyer needs to take is to accept they are struggling with their mental health. Make a smart choice and admit that you need help.

2. Talk To Your Doctor: Explain your current situation with your doctor. He or she will refer you to a mental health counselor who can better address your situation. It is important that you listen and follow the advice from your doctor or medical professional rather than following the advice from your friends and other people you may know.

3. Find a mental health support group: There are many mental health awareness support groups in any given area. Many hospitals, churches, and counselors in your area will be

able to provide you with a list of these organizations. These groups can connect you with people who can relate to your situation and help you get through the process.

4. Watch What You Say: Whatever you do, there will be those who support you and those who just do not understand your situation. Only share your private information with the people you trust and the medical professionals. When talking with your coworkers and clients, just say that you are stressed out. This will reduce the number of questions you will get from others.

5. Don't argue with others: It is important that you do not get into arguments with those who may get on your case. It is not your job to worry about how others may view your circumstances. Focus on managing your mental health rather than trying to get everyone's approval. Your personal health issues are not a public relations event.

6. Getting Advice Is Smart: Everyone deals with fear, stress and anxiety in one's life, whether your friends and others care to admit it. In addition, do not be embarrassed that you are getting help. We all learn new things from others and learning how to manage your anxieties is no different.

7. You are not alone: There are millions of people around the world who struggle with their fears, anxieties, and depression. Many of your coworkers, friends, and family members have likely struggled with anxiety and stress sometime in their life. Do not feel that you are alone when it comes to your mental health because there are all kinds of people around you who can relate.

8. Learn From The Mistakes of Others: If you feel that your career is more important than your mental health, then follow the lessons from other lawyers who neglected their health. There are a countless number of people who ignored their mental health issues for various reasons and either committed suicide, or they ended up losing everything. Do not make the same mistake.

In the meantime, here is some additional advice on how to deal with your mental health issues.

1. Take a break: Sometimes we get anxious when everything happens all at once. When this happens, take a deep breath and find something to do for a few minutes to get your mind off the problem. A person can get some fresh air, listen to some music, or do an activity that will give them a fresh perspective.

2. Get the facts: Gathering the facts of a certain event can prevent us from relying on exaggerated and fearful assumptions. By focusing on the facts, a person can rely on what is reality on your current situation.

3. Use Self-Visualization: Sometimes, we can get anxious over a task that we will have to perform in the future. When this happens, visualize yourself doing the task in your mind. For instance, you are competing in the [championship volleyball](#) game in front of a large group of people in the next few days. Before the big day comes, imagine yourself playing the game in your mind. By doing this, you will be better prepared when the time comes.

4. Focus on your breathing: Deep breathing forces your body to physically calm itself. Whenever you get anxious, stop what you are doing and focus on your breathing. Take a few deep breaths and slowly let it out.

5. You can't predict the future: While the consequences of a particular fear may seem real, there are other factors that cannot be anticipated and can affect the results of any situation. We may be ninety-nine percent correct in predicting the future, but all it takes is for that one percent to make a world of difference.

6. Do not make the mistake of doing nothing. Contrary to popular belief, most mental health issues do not just "go away" by themselves. Save yourself time and money by addressing your mental health issues now rather than when things could get worse. Jobs come and go, but your physical and mental health lasts forever.

BIOGRAPHY

Stan is the author of "A Layman's Guide to Managing Fear" which covers a variety of techniques that can drastically improve your mental health. For more information, please visit Stan's website at <http://www.managingfear.com>

RCBA Cares

The following resources are provided to you courtesy of the Lawyer to Lawyer Committee.*

Lawyer Assistance Programs

New York State Bar Association: 1-800-255-0569; lap@nysba.org

New York City Bar Association: 212-302-5787; <https://nysba.org/attorney-well-being/>

Suicide Prevention

National Suicide Prevention Lifeline: 988

Crisis Text Line: Need help? Text START to 741-741

Chemical Dependency and Self-Help Sites

Alcoholics Anonymous (AA): 212-870-3400; www.aa.org

International Lawyers in A.A. (ILAA): www.ilaa.org

Narcotics Anonymous (NA): 818-773-9999; www.na.org

Nicotine Anonymous (NA): 1-877-TRY-NICA; nicotine-anonymous.org

Mental Health

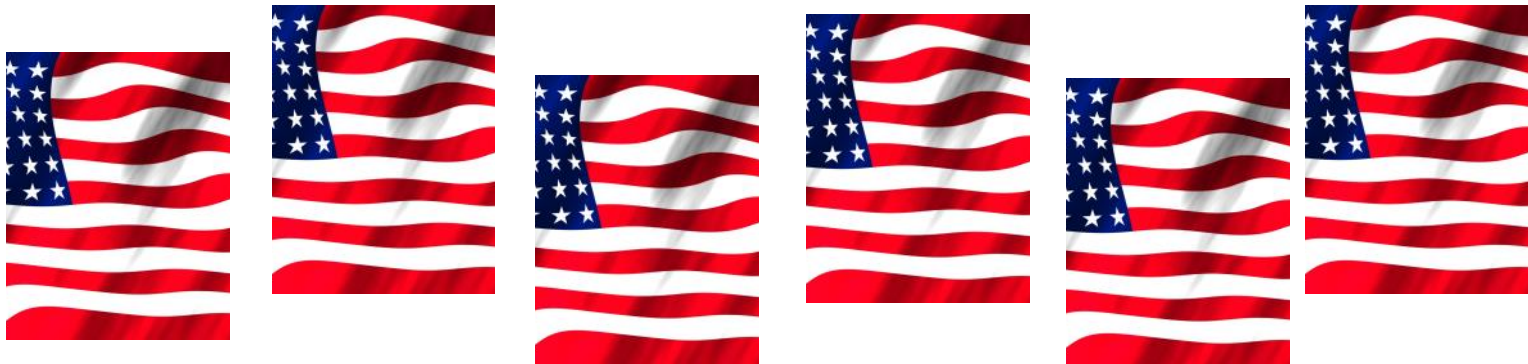
Depressed Anonymous: depressedanon.com

National Mental Health Association (NMHA) - 1-800-273-TALK (8255) to reach a 24-hour crisis center;
Text MHA to 741741 at the Crisis Text Line

Source: Andrew Denney, Bureau Chief of NYLJ and the New York State Association of Criminal Defense Lawyers.

****For more information about the Lawyer to Lawyer Committee,***

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Advertising & articles appearing in the RCBA Newsletter does not presume endorsement of products, services & views of the Rockland County Bar

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All advertisements and articles must be reviewed by the Executive Committee for content.

CLE Board
Updated 2025 CLE Schedule
Please continue to check for updates!

<u>Date of Program</u>	<u>Time</u>	<u>Program Title</u>
Tuesday, September 9, 2025	Online/Virtual 12:30 pm-1:45 pm	Planning Considerations for NY's New Medicaid Eligibility Requirements for Long-Term Care
Thursday, October 29, 2025	Online/Virtual 12:30 pm-1:45 pm	Judgement Enforcement
Thursday, November 19, 2025	In-Person 6:00 pm-8:00	Assessing Actual Innocence

Missed a CLE program? You can earn credit by watching the video replay.

Contact Jeanmarie@Rocklandbar.org to receive the recording.

***Please note: Not all CLEs have been recorded.**

MEMO

TO ALL RCBA COMMITTEE CHAIRS & VICE – CHAIRS

The Association is seeking articles from your committee for publication in the Bar's monthly Newsletter. The membership would greatly benefit from your input and would appreciate it. The article does not have to be complicated or long- a succinct piece of general interest and importance would be best.

If you are able to submit an article for the Newsletter it should be sent via email to Jeanmarie@rocklandbar.org by the 15th of the month so that the Executive Board may review it.

Thank you!



Monthly
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