

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Karin Wolf, et al.,

Plaintiffs

-against-

Gerald C. Escala, et al.,

Defendants.

Case no. 2:14-cv-05985

**REQUEST FOR
JUDICIAL NOTICE**

PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF CLAIMS

Plaintiff Karin Elena Wolf, pursuant to *Rule 56* of the *Federal Rules of Civil Procedure* and *Rule 201* of the *Federal Rules of Evidence*, respectfully requests that the Honorable Court take Judicial Notice of the following adjudicative facts and/or public records in support of Karin Elena Wolf's Petition for Writ of Mandamus. As grounds therefore, Karin Elena Wolf states as follows:

Judicial notice is a means by which adjudicative facts not seriously open to dispute are established as true without the normal requirement of proof by evidence. *Dippin'Dots, Inc. v. Frosty Bites Distribution, LLC*, 369 F.3d 1197, 1204 (11th Cir. 2004); *Fed. R.Evid. 201(a)* and *(b)*; see also *Fed. R. Evid. 201(a)*. Adjudicative facts are facts that are relevant to a determination of the claims presented in a case. *Id.* One category of adjudicative facts subject to judicial notice includes facts that are "generally known within the territorial jurisdiction of the trial court." *Id.* (quoting *Fed. R. Evid. 201(b)(1)*). Such judicially-noticed facts have been described as being "of breathtaking variety." *Id.* (collecting cases). Another category includes facts that can be accurately and readily

determined from sources whose accuracy cannot reasonably be questioned. *Fed. R. Evid. 201(b)(1)*. A court also may take judicial notice of public records. *Universal Express, Inc. v. U.S. Securities and Exchange Commission*, 177 Fed. Appx. 52, 53 (11th Cir. 2006). Judicial Notice of appropriate adjudicative facts may be taken at any stage in a proceeding, including at the summary judgment stage. *Dippin' Dots, Inc.*, 369 F.3d at 1204; *Fed. R. Evid. 201(f)*. Courts have wide discretion to take Judicial Notice of facts. *Id.*; *Fed. R. Evid. 201(c)*.

Because the following adjudicative facts and/or public records relevant to a determination of the claims presented in this case are generally known within the territorial jurisdiction of this Court and are not subject to reasonable dispute, judicial notice should be taken of them:

1. In its just-released 2016 report, the United Nations Commission on the Status of Women (CSW) recognizes women losing custody as an international form of discrimination against women, i.e. systemic male entitlement. It is now on the international map as a human rights issue. The CSW 2016 report officially recognizes “discrimination against women resulting in the loss of child custody to abusive fathers”. [see attached report, p. 55-56, notably # 7 (c)(f)(g)(i)(j) and (k)]. Plaintiff was included as one of over 150 women whose child custody case was considered by the United Nations here.
2. New Jersey Senate Judiciary Committee hearing held on May 23, 2016 on Gov. Chris Christie’s plan to award tenure to state Superior Court Judge Paul X. Escandon, where several women’s advocacy groups and women came forth to argue against it and testify they were discriminated against by Judge Escandon in New Jersey Family Court. In

addition, Monmouth County Assignment Judge Lisa P. Thorton was caught lying under oath during the hearing.

See attached - *Custody Rulings Stymie Tenure Nomination While 7 Others Pass*, by Michael Booth, New Jersey Law Journal, May 24, 2016.

<http://www.njlawjournal.com/id=1202758501624/Custody-Rulings-Stymie-Tenure-Nomination-While-7-Others-Pass#ixzz4BOfqZMUx>

See attached - *Christie Monmouth Judge Nominee in Trouble* by Bob Jordan, Asbury Park Press May 31, 2016.

<http://www.app.com/story/news/local/new-jersey/2016/05/27/another-chris-christie-nominee-trouble/85051050/>

Dated: _____

Respectfully submitted,

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