

- 1 4. In addition to the foregoing, I was for all intents and purposes unable to attend to the normal
2 duties of my office, and found myself working at a greatly reduced capacity, from March, 2020
3 to March, 2021, as a result of complication from a congenital brain disease that has plagued
4 me for most of my life. I have medical proof of this condition, and will present the same to the
5 Court in camera if that is desired. Fortunately, in March, 2021, my symptoms reversed
6 themselves and that is when I returned to full time work at the office. At the same time, my one
7 and only associate attorney, David Mangikyan, Esq., who had been handling this case during
8 my absence, left the firm for another job and I became a sole practitioner once again, having to
9 absorb Mr. Mangikyan's caseload. I am presenting this information in order to fully inform the
10 Court that from March, 2021 to the present date I have been faced with numerous
11 unanticipated deadlines to say nothing of having to work long hours to bring my new caseload
12 to a manageable level. The nature of my disability is such that it is triggered by stress, and so it
13 was, during this time, necessary to keep that in mind in meeting my deadlines, to say nothing of
14 the normal flow of assignments from my clients.
- 15 5. My paralegal who is solely responsible for the formatting, finalization and filing my law and
16 motion matters was out of the office on Friday, May 14, 2021 and Monday, May 17, 2021.
17 She was also out ill all day on May 18, 2021, the day I realized I was late filing this motion.
18 On account of this, on Friday I placed the Memo of Costs which is at issue in this case in my
19 briefcase and brought it home with the intention of working on it over the weekend. Because
20 of my condition, however, it had become necessary for me to rest from work the entire
21 weekend, and during that time I completely forgot about the motion, and due to this
22 forgetfulness continuing until Tuesday, May 18, 2021, I did not recognize my error until that
23 time.
- 24 6. On Monday, May 17, 2021, we concluded the video trial in the matter referred to above in the
25 morning, and I simply spent the rest of the day working on a multitude of assignments,
26 completely unaware of the Memo of Cost in my briefcase, and it being due that day.