Lessons Learned from Women Litigators and Judges

One of the hottest programs of the Annual Meeting returns with a fresh panel of judges an practitioners who will discuss their journeys in the legal profession and what strategies attorneys can use in their day-to-day practices.

SULLIVAN & CROMWELL LLP

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April 18, 2026

Via ECF

Hon. Martin Glenn,
U.S. Bankruptcy Court, S.D.N.Y.,
One Bowling Green,
New York, NY 10004-1408.

Re: In re Prince Global Holdings Limited, *et al*., No. 26-10769

Dear Chief Judge Glenn:

Sullivan & Cromwell LLP (the "Firm") represents the Joint Provisional Liquidators (the "JPLs") in the above-referenced matter. I became aware Thursday evening that the JPLs' *Emergency Motion for Entry of Orders Granting (I) Ex Parte Relief and (II) Provisional Relief, Pursuant to Section 1519 of the Bankruptcy Code* filed with the Court on April 9, 2026 (the "Motion") [D.I. 9] includes inaccurate citations and other errors, each of which is identified and corrected in Schedule A to this letter.

The inaccuracies and errors in the Motion include artificial intelligence ("AI") "hallucinations." "Hallucinations" are instances in which artificial intelligence tools fabricate case citations, misquote authorities, or generate non-existent legal sources. We deeply regret that this has occurred. The Firm maintains comprehensive policies and training requirements governing the use of AI tools in legal work. These safeguards are designed to prevent exactly this situation. The Firm's policies on the use of AI were not followed in connection with the preparation of the Motion. In addition, the Firm has general policies and training requirements for the proper review of legal citations. Regrettably, this review process did not identify the inaccurate citations generated by AI, nor did it identify other errors that appear to have resulted in whole or in part from manual error.

The Firm has undertaken immediate remedial measures, including but not limited to a full review of the circumstances leading to these errors, and a re-review of all filings in this matter, and we can confirm that the other filings do not include any AI-related errors. Our re-review did identify non-substantive and/or clerical errors in other filings in this matter (and one citation that confuses Section 1517(d) and Rule 6004(h)), which we

do not believe to be the result of AI usage. These errors are also identified in Schedule A for the sake of completeness.

The Firm and I are keenly aware of our responsibility to ensure the accuracy of all submissions including under Local Bankruptcy Rule 9011-1(d), and I take responsibility for the failure to do so.

I want to assure the Court that the Firm's policies governing AI use are both clear and rigorous. Access to AI tools is conditioned on completion of mandatory training. Before any Firm lawyer is granted access to generative AI tools, the lawyer must complete two required training modules, completion of which is tracked and verified.

The training repeatedly emphasizes the risk of AI "hallucinations," including the fabrication of case citations, misinterpretation of authorities, and inaccurate quotations. It instructs lawyers to "trust nothing and verify everything" and makes clear that failure to independently verify AI-generated output constitutes a violation of Firm policy. The training also reviews the significant consequences of AI-related errors in various cases.

These requirements are reinforced in the Firm's Office Manual for Lawyers, which provides that lawyers "must independently check all answers, case citations, and other information or work product received from an AI Program for both substantive and non-substantive accuracy." The policy further states that no communication may be sent to a court, regulator, client, or other external party without the exercise of appropriate professional judgment and oversight.

Notwithstanding these safeguards, the Firm's protocols were not followed here. The Firm is also evaluating whether further enhancements to its internal training and review processes are warranted.

We sincerely regret the errors in the Motion and the burden they have imposed on the Court and the parties, and I apologize on behalf of our entire team. I also called Boies Schiller Flexner LLP on Friday to thank them for bringing this matter to our attention and to apologize directly to them as well. A corrected version of the Motion, together with a redline reflecting the revisions, is being filed later today.

Sincerely,
/s/ Andrew G. Dietderich
Andrew G. Dietderich

Schedule A

Errors in Motion for Provisional Relief

Para.	Correction
¶ 19	. . . *In re Oi S.A.*, No. 16-11791 (SHL) **[D.I. No. 22]** (Bankr. S.D.N.Y. Jun. 22, 2016) (finding that provisional relief was necessary to protect the debtor's US assets); *see also In re Muscletech Research and Dev. Inc*., **No. 06-10092 (JMP), Adv.** No. 06-01147 (JMP) (Bankr. S.D.N.Y. Jan. 18, 2006) . . .
¶ 21	. . . *See also In re GHR Energy Corp*., 35 B.R. 534**, 535 n.2** (Bankr. D. Mass. 1983) . . . *Matter of M4 Enters., Inc*., 190 B.R. 471**, 473 n.2** (Bankr. N.D. Ga. 1995) . . .
¶ 23	. . . *See In re Oak and Fort Corp*., No. 1:25-bk-11282 (MG) [D.I. 21] (**Bankr.** S.D.N.Y. June 23, 2025) . . .
¶ 24	. . . *In re Worldwide Educ. Servs., Inc.*, 494 B.R. 494, 499 **n.1** (Bankr. C.D. Cal. 2013) . . .
¶ 26	. . . *See In re Soundview Elite Ltd*., ~~503~~ **543** B.R. ~~571, 588-90~~ **78** (Bankr. S.D.N.Y. ~~2014~~ **2016**) . . .
¶ 27	. . . *See* ~~*In re Three Arrows Cap., Ltd.*, 2022 WL 17985951, at *7;~~ *In re BYJU's Alpha, Inc.*, 2024 WL 1455586, at *~~5~~ **8** (Bankr. D. Del. Apr. 3, 2024)~~, aff'd, 2024 WL 3474561 (D. Del. July 18, 2024)~~ . . .
¶ 33	. . . *In re Soundview Elite Ltd*., ~~503~~ **543** B.R. ~~at 589~~ **78, 117, 119-20 (Bankr. S.D.N.Y. 2016) (**~~"The~~ **finding** irreparable harm ~~here is the~~ **where there was a** risk that the estate's assets ~~will~~ **would** be dissipated~~ or otherwise placed beyond the reach of this Court, such that any relief awarded at a later time would be meaningless."~~); *In re BYJU's Alpha, Inc.*, 2024 WL 1455586, at ~~6-7~~ ***1, *10** (Bankr. D. Del. Apr. 3, 2024)~~, aff'd, 2024 WL 3474561 (D. Del. July 18, 2024)~~ . . .
¶ 34	. . . *See* ~~*In re Three Arrows Cap., Ltd.*, 2022 WL 17985951, at 10-11 ("Where the foreign representatives lack information regarding the debtor's assets and their location, provisional relief is appropriate to ensure that estate property can be identified and preserved.");~~ *In re Team Sys. Int'l, LLC*, 2023 WL 1428572, at *~~8~~ **12** (injunction warranted where defendants' conduct ~~"obscured the disposition of estate assets and frustrated the trustee's ability to determine their location~~ **gave "cause for concern" that it "may move or conceal assets**") . . .
¶ 35	. . . *See In re BYJU's Alpha, Inc*., 2024 WL 1455586, at ~~6-7~~ ***10** . . .
¶ 37	. . . *See In re BYJU's Alpha, Inc*., 2024 WL 1455586, at ~~7~~ ***10** . . . *In re Rubin*, 160 B.R. 269, 283 (Bankr. S.D.N.Y. 1993)~~; *see also*~~ **(quoting** *In re Lines*, 81 B.R. 267, 270 (Bankr. S.D.N.Y. 1988~~) (same~~**)** . . .
¶ 38	. . . *See* Pretlove Declaration ¶ 59**, Ex. E**. . . . *In re Iovate Health Scis. Int'l Inc.*, 2025 Bankr. LEXIS 2284, at *~~33~~ **36** . . .
¶ 40	. . . *See In re Innua Canada Ltd*., ~~No. 09-16362,~~ 2009 WL 1025088, at *4 (Bankr. D.N.J. Mar. 25, 2009) (maintaining the status quo pending recognition served to benefit creditors "by allowing for an orderly administration of the **Ff**~~f~~oreign **Dd**~~d~~ebtors' financial affairs under the **[**foreign**]** **[**p**]**roceeding") . . .
¶ 41	. . . *See* Pretlove Declaration ¶¶ 54~~, 59, 61~~-**63**. . . .
¶ 42	. . . The ~~"~~relevant inquiry is whether the discovery sought ~~. . .~~ is **"(**~~i~~**1)** necessary in the interests of justice; and (~~ii~~**2**) not possible to **obtain**~~ . . . in another~~ **in any other** manner." . . .
¶ 44	. . . *See In re Picard,* ***Tr. for Liquidation of Bernard L. Madoff Inv. Sec. LLC***, 917 F.3d 85, 103 (2d Cir. 2019) . . .

Para.	Correction
¶ 47	. . . *In re ENNIA Caribe Holding N.V.*, 596 B.R. 316, 322 (Bankr. S.D.N.Y. 2019) **(internal citations omitted)**. . .
¶ 48	. . . *See In re Iovate Health Scis. Int'l Inc*., 2025 Bankr. LEXIS 2284, at *~~34~~ **38** . . .
¶ 52, n.2	*See* Off. of Foreign Assets Control, *Frequently Asked Question* No. 9 (explaining that blocked property is "frozen"—not seized—and that title remains with the blocked person); ~~***Calderon-Cardona* v. *Bank of N.Y. Mellon*, 821 F.3d 161, 169 (2d Cir. 2016) (explaining that blocking rules "prohibit transfers" but do not determine "whether a judgment creditor may obtain those funds through judicial process");~~ *Hausler* v. *JPMorgan Chase Bank, N.A*., 770 F.3d 207, ~~212~~ **211** (2d Cir. 2014) (**noting that** blocked assets are ~~not "immunize[d] … from execution")~~ **"subject to execution or attachment in the aid of execution in order to satisfy such judgment . . . for which such terrorist party has been adjudged liable") (citing Terrorism Risk Insurance Act § 201(a))**.
¶ 55	. . . *In re Three Arrows Capital, Ltd*., 2022 WL 179859~~51~~**69**, at *9-11 (~~granting discovery~~ **service of subpoena was proper** where founders were likely the only parties with necessary information about the debtor's assets) . . .
¶ 59	. . . This Motion seeks, in part, emergency *ex parte* relief. ~~As expressly contemplated by section 1519(b) of the Bankruptcy Code, which permits the Court to grant relief "on an *ex parte* basis," the~~ **The** urgent need to obtain the Emergency Order without prior notice is warranted because . . .
¶ 60	. . . *see also In re Iovate Health Scis. Int'l Inc*., 2025 Bankr. LEXIS 2284, at *~~34 35~~ **39** . . .

Error in Verified Petition

Para.	Correction
¶ 28	. . . *In re Fairfield Sentry Ltd*., No. 10 Civ. 7311 (GBD), 2011 WL 4357421 (S.D.N.Y. 2011), at *~~10 16~~ **7** . . .

Error in Motion for Joint Administration

Para.	Correction
¶ 6	Bankruptcy Rule 1015(b) provides, in relevant part, that if "two or more ~~petitions~~ **cases** **[**are**]** pending in the ~~same~~ court **. . .** by or against . . . a debtor and an affiliate,**"** the court **"**may order a joint administration of the estates." . . . Accordingly, "two or more ~~petitions~~ **cases** **[**are**]** pending" in this Court . . . .

Errors in Motion for Entry of an Order Scheduling the Recognition Hearing

Para.	Correction
¶ 6	Section 1517(c) of the Bankruptcy Code provides that "[a] petition for recognition of a foreign proceeding shall be decided **upon** at the earliest possible time." 11 U.S.C. § 1517(c). Additionally, Bankruptcy Rule 2002(q)(1) provides that **"**~~[~~a~~]~~fter the filing of a petition for recognition of a foreign proceeding, the court shall promptly schedule and hold a hearing on the motion.**"**
¶ 7	Bankruptcy Rule 2002(q)(1) further provides that~~: . . .~~ the debtor, all persons or bodies authorized to administer foreign proceedings of the debtor, all entities against whom provisional relief is being sought under § 1519 of the Code, all parties to litigation pending in the United States in which the debtor is a party at the time of the filing of the petition, and such other entities as the court may direct, ~~[~~shall be given~~]~~ at least 21 days' notice by mail of the hearing~~. . .~~.

Errors in Declaration of Andrew Chissick

Para.	Correction
¶ 20	On October 14, 2025, the government of the United Kingdom ("U.K.") announced corresponding sanctions against individuals associated with the Prince Group, including measures affecting assets and properties located in the U.K. and held directly or indirectly by various corporate structures, including entities incorporated in the BVI.[5] Following the extension of U.K. sanctions to the BVI, the BVI Financial Services Commission issued sanctions guidance reminding regulated persons of their obligations under BVI law and the criminal consequences of non-compliance.[5]
¶ 33	. . . the BVI Court may appoint a provisional liquidator if it **is** satisfied . . .
¶ 48	. . . to be examined on oath or affirmation. BVI Insolvency Act § 282(1)-**(2)(a)–(c)**.
¶ 50	. . . whether a winding-up order will ultimately be made. BVI Orders ¶¶ 1-3–**16**; BVI Insolvency Act §**§** 171.
¶ 53	. . . to act in the interests of the Debtors. BVI Orders ¶ 4; Protocol §§ 1–**23, 9**, 15.
¶ 60	. . . BCA § 245 ("For **the** purposes of determining matters . . .").
¶ 65	. . . statutory authority to carry out their functions and duties. *See supra* ¶¶ 42–**55 54**.

Errors in Declaration of Paul Pretlove

Para.	Correction
¶ 9, n.3	. . . *In re Three Arrows **Cap.** **Fund**, Ltd*., **649 B.R. 143** **No. 24-10210 (MG)** (Bankr. S.D.N.Y. **Feb. 8** 202**3**4) . . . *In re Hector Dao*, No. 24-16067 (MBK) (Bankr. D.N.J., June 17, 202**1**4) . . .
¶ 21	. . . and guidance on registering social media accounts in bulk. *Id*. ¶ **32,** 34.
¶ 23 n.4	*See A Wicked Problem: **Online Scam Operations and Trafficking into Forced Criminality in Southeast Asia** **Seeking Human Rights-Based Solutions to Trafficking into Cyber-Scam Operations in South-East Asia***, UN Office of the High Commissioner for Human Rights (Feb. 20, 2026) . . . "*I Was Someone Else's Property": **Forced Online Scam Labour in Cambodia** **Slavery, Human Trafficking and Torture in Cambodia's Scamming Compounds**, Amnesty Int'l* (June 2025) . . .
¶ 25	. . . then used the cash to purchase clean bitcoin or other cryptocurrencies. *Id*. ¶ **46 39**.
¶ 26	. . . in one instance, by more than 1,000%. ***Id.*** **Indictment** ¶ 47 . . . the sixth-largest bitcoin mining operation in the world. ***Id.*** **Verified Compl. in Rem** ¶¶ 48–49 . . . the operating capital comprised funds stolen from victims. *Id*. ¶ **49 42**.
¶ 27	. . . with newly mined bitcoin to make laundered proceeds appear to originate from legitimate mining activity. *Id*. ¶¶ **50–52 42-43**. . . .
¶ 39	. . . the conclusion of which the company is dissolved and ceases to exist. *See* Chissick **Declaration** ¶¶ 17, 32, 40.
¶ 42	. . . in material part, been displaced and now vest exclusively in the JPLs. *See* Chissick Declaration ¶ **40 33-52**.
¶ 45	. . . ". . . remitting assets to the control of the **[**JPLs**]** and for the purpose of obtaining access to and control of the records of the Company."
¶ 76	I understand from the Debtors' U.S. counsel that, upon recognition, **section 1517(d) of the Bankruptcy Code ordinarily** **Bankruptcy Rule 6004(h) may** impose**s** a 14-day stay before the recognition order takes effect. . . .

Madeline Cox Arleo is a United States District Court Judge for the District of New Jersey.

Prior to being elevated, she was federal magistrate judge for the same court. President Barack Obama nominated Arleo to the United States District Court for the District of New Jersey on June 26, 2014. On November 20, 2014, Arleo was confirmed by the Senate on a voice vote.

She was appointed to the magistrate position on December 28, 2000.

Honorable Mara Zazzali-Hogan, P.J.Ch. is Presiding Judge, Chancery Division, Monmouth County, and sits in Freehold, New Jersey.

Judge Zazzali-Hogan received her J.D. from Seton Hall University School of Law.

BIO OF THE HONORABLE GRETA GOODEN BROWN, J.A.D.

Greta Gooden Brown, a sitting Appellate Division Judge, was first appointed to serve a seven-year term as a Superior Court Judge by then Governor Jon Corzine on July 1, 2009. After serving in the Law Division for five years, in 2014, she was named the Presiding Judge of the Family Part, Chancery Division, in the Passaic County Vicinage. She was elevated to the Appellate Division after being re-appointed by then Governor Chris Christie and granted tenure by the full Senate in 2016.

Gooden Brown's professional experience leading up to her judicial appointment is extensive. In 2001, she was appointed by then Acting Governor Donald DiFrancesco to serve as the second New Jersey Insurance Fraud Prosecutor, where she headed one of the largest law enforcement agencies in the State, administered an annual budget of approximately $30 million, and oversaw a staff of approximately 300. Under her leadership, the Office of the Insurance Fraud Prosecutor in the Criminal Justice Division of the Attorney General's Office was recognized as a national and international leader in fighting insurance fraud.

Prior to her appointment as the Insurance Fraud Prosecutor, Gooden Brown was a veteran prosecutor, having served in the Attorney General's Criminal Justice Division in a variety of positions. She joined the Division in 1983 as a Deputy Attorney General in the Appellate Bureau. From 1985 to 1994, she served in various supervisory capacities in the Appellate Bureau, the Institutional Abuse Unit and the Medicaid Fraud Section.

From 1994 to 2001, Gooden Brown headed the Prosecutors and Police Bureau where, on behalf of the Attorney General, she was responsible for overseeing and coordinating the work of all twenty-one County Prosecutors, their respective municipal prosecutors, and local police departments. In 1999, she was promoted to an Assistant Attorney General, the first African American Assistant Attorney General in the history of the Division of Criminal Justice.

A 1977 honors graduate of Essex County College, Gooden Brown earned a B.A. in Economics from Rutgers University's Douglass College in 1979, and a law degree from Rutgers Law School in 1982. From 1982 to 1983, she served as a law clerk to the Honorable Stephen Skillman, Judge of the Appellate Division, Ret., and the Honorable Judson Hamlin, Judge of the Superior Court, Ret.

Gooden Brown is the recipient of several prestigious awards. In 1999, she was inducted into the Douglass Society, a coveted honor for Douglass College Alumnae. In 2005, she was selected as a "High Achieving Woman and Minority Lawyer" by the New Jersey Law Journal. In 2007, she was the recipient of the renowned Thurgood Marshall Award for Excellence in the Profession. Gooden Brown was also awarded the 2007 Corporate and Government Leadership Award by the Caribbean Bar Association of New Jersey. In addition, Gooden Brown was a recipient of the 2007 Professional Lawyer of the Year Award presented by the New Jersey Commission on Professionalism in the Law.

In 2007, Gooden Brown was elected to a three-year term as a Trustee of the New Jersey State Bar Association's Criminal Law Section, and, in 2008, she was elected the 26th President of the Garden State Bar Association, one of the largest specialty bars in the State. Gooden Brown received the Association of Black Women Lawyers' Excellence in Public Service Award in 2008, as well as a Joint Legislative Resolution from the New Jersey Senate and General Assembly in recognition of this honor. She also received the Honorable Glenn Cunningham Public Safety/Law Enforcement Award from the National Organization of Black Law Enforcement Executives (NOBLE), and a Citation from the late United States Senator Frank Lautenberg for exemplary public service and leadership.

A dedicated public servant, Gooden Brown is a founding member of the Honorable Anne E. Thompson Inn of Court, and served as the Chair of the Passaic Vicinage Advisory Committee on Minority Concerns, and the Vice Chair of the Supreme Court Committee on Model Criminal Jury Charges. Over the years, she served on various Supreme Court Committees that have recommended sweeping changes to our justice system, including the Joint Committee on Criminal Justice, which was instrumental in the 2014 enactment of the Criminal Justice Reform Act and constitutional amendment largely abandoning the resource-based system of monetary bail to eliminate racial and income-based inequities in our criminal justice system. In 2021, she was elected as a member of The American Law Institute.

Industries

Health Care

Practice Areas

Labor & Employment

Bar Memberships

New Jersey

Christine A. Amalfe

Partner

camalfe@fbtgibbons.com | 973.596.4829

One Gateway Center
Newark, NJ 07102

Christine co-leads the firm's Labor & Employment Practice Group. She is included on the *Best Lawyers*®, *Chambers USA Guide to America's Leading Lawyers for Business*, and *New Jersey Super Lawyers* lists in various employment categories. She manages lawyers across four firm offices, overseeing legal, administrative, and business development functions for one of the firm's most active business units, with clients among the world's best-known companies representing industries critical to the local, state, and regional economies.

In addition, Christine is a co-founder of the firm's internationally recognized women's initiative. She is serving as President of the New Jersey State Bar Association for the 2025-2026 term.

Christine is regularly commended by clients for understanding their business needs while aggressively litigating their legal issues and providing comprehensive employment related counseling and training. She has been extensively involved in defending single plaintiff, multi-plaintiff, and class claims under state and federal employment laws. She also conducts multifaceted employment counseling and training for corporate clients, public entities, and educational institutions.

Other Info About Christine

Education

Syracuse University College of Law, J.D., *magna cum laud*

- *Order of the Coif*
- Senior Editor, *Syracuse Law Review*, 1984-1985

Seton Hall University, B.S., *magna cum laude*

Courts

United States District Court for the District of New Jersey

United States District Court for the Southern District of New York

United States District Court for the Eastern District of New York

United States District Court for the Northern District of New York

United States District Court for the Western District of New York

United States Court of Appeals for the Third Circuit

United States Court of Appeals for the Second Circuit, Supreme Court of the United States

Recognition

March 10 – New York City Bar Award – Amalfe received a lifetime achievement award at the 2026 NYCBA International Law Conference on the Status of Women. The Huntington Her Hero Lifetime Achievement Award recognizes women in law and public policy who have dedicated their careers to advancing justice for women and girls.

Included on the *ROI-NJ* "Law" Influencers Power list, 2026

Included on the *NJBIZ* "Law Power" list, 2025

Included on the *ROI-NJ* "Influencers: Women in Business" list, 2025

Recipient, *NJBIZ* ICON Award 2025

Included on the *Benchmark Litigation* "Litigation Stars" list, Employment & Labor Law

Recipient, CIANJ/*Commerce* "Enterprising Women in Commerce Award – Legal," 2022

Included on the *Chambers USA Guide to America's Leading Lawyers for Business* list, Labor & Employment

Recognized by Best Lawyers®, 2026 Edition: Employment Law – Management; Litigation – Labor & Employment; "Lawyer of the

Year": Litigation – Labor & Employment in Newark, NJ

Recognized by Best Lawyers®: "Lawyer of the Year," Litigation – Labor and Employment in Newark, NJ (2020 Edition)

Included on the *New Jersey Super Lawyers* lists, Employment & Labor; Top 10 Attorneys in New Jersey; Top 50 Female Attorneys in New Jersey; Top 100 Attorneys in New Jersey; 2018 Featured Cover Story

Included on the *Benchmark Litigation* lists, "Local Litigation Stars"; "Labor & Employment Stars – Northeast"

Recipient, Essex County Bar Association Samuel S. Saiber Professional Achievement Award, 2022

Included on the BTI Client Services All-Stars Report, 2019

Recipient, *New Jersey Law Journal* Lifetime Achievement Award, 2015

Elected a Fellow of the College of Labor and Employment Lawyers, 2015

Recipient, Trial Attorneys of New Jersey "Trial Bar Award," 2015

Included on the *New Jersey Monthly* list, Leading Women Entrepreneurs, 2011

Recipient, Essex County Bar Association's Civil Trial Attorney Award, 2011

Included on the *Profiles in Diversity Journal* "Women Worth Watching" list, 2010

Recipient, New Jersey Women Lawyers Association's Women's Initiative & Leaders in Law (WILL) Platinum Award, 2008

Included on the *NJBIZ* "Best 50 Women in Business" list, 2007

Honored by The Center for Women and Work, November 27, 2006

Recipient, Center for Women and Work – Rutgers University, Connecting Communities Award, October 3, 2006

Included on the *NJBIZ* "25 Women of Influence" list, November 2004

Appointment by the Supreme Court of New Jersey, State of New Jersey Committee on Character, July 10, 2000-2003

Recipient, Executive Women of New Jersey Salute to the Policy Makers Award, April 27, 2000

Professional Affiliations

New Jersey State Bar Association
President – 2025-2026
President-Elect, 2024-2025
First Vice President, 2023-2024
Second Vice President, 2022-2023
Treasurer, 2021-2022
Secretary, 2020-2021
Trustee, 2013
Future of Legal Services Task Force, 2022
Chair, Law Firm Opening and Operations Committee, Pandemic Task Force, 2020
Executive Committee Member, Labor & Employment Law Section
Amicus Committee, 2017-2018
Higher Education Committee, 2017-2018
Judicial Administration Committee, 2017-2018
General Council Executive Committee
Pro Bono Committee, 1995-1997
Trustee, Women in the Profession Section

American College of Trial Lawyers
Fellow

National Association of College and University Attorneys

American College of Employment Lawyers

Academy of New Jersey Management Attorneys Inc.
Founding Member

New Jersey State Bar Foundation
Trustee

Essex County Bar Association

American Bar Association
Labor and Employment Law Section
EEO Committee
Employee Rights and Responsibilities Committee
Women in the Profession Section
Advisory Council for the Initiative on Achieving Long-Term Careers for Women in Law/Summit Co-Chair, 2017-2018

National Association of Women Lawyers (NAWL)
President, NAWL Foundation, 2012-2013

New Jersey Women Lawyers Association

Federal Bar Association

Litigation Counsel of America
Senior Fellow

Seton Hall University School of Law
Adjunct Professor, Legal Writing and Advocacy, 1992-1993

Gibbons Law Alert blog (www.gibbonslawalert.com)
Editorial Board

New Jersey Supreme Court Advisory Committee on Expedited Civil Actions

New York City Council Task Force on Discrimination and Harassment

Civic Activities

American Bar Foundation

Featured Articles

NJBIZ Quotes FBT Gibbons Partner Christine Amalfe in NJBIZ 2026 Economic Outlook Issue

Christina A. Livorsi

Partner

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clivorsi@daypitney.com

Overview

Christina Livorsi, whose practice spans a wide range of litigation, including complex commercial litigation, federal and state qui tam litigation, represents government entities in actions arising under the federal and state False Claims Acts. She also represents lenders, mortgage loan servicers and financial institutions in disputes related to lending practices, loan origination, debt collection practices, loan servicing and deceptive business practices. Her practice includes the defense of claims arising under the Truth in Lending Act (TILA), Real Estate Settlement Procedures Act (RESPA), Fair Credit Reporting Act (FCRA), and Fair Debt Collection Practices Act (FDCPA), as well as a variety of state and common law claims. She also has experience with insurance coverage and subrogation actions, and complex reinsurance dispute arbitration.

Experience

No aspect of this advertisement has been approved by the highest court of any state. Prior results do not guarantee a similar outcome.

Represented a mortgage servicer in an appeal to the New York Court of Appeals (New York's highest court) securing a reversal of the appellate division's dismissal of the action as time-barred in a precedent-setting, pro-lender/servicer decision

Represented a mortgage servicer in a suit brought in the District of New Jersey by a borrower who alleged violations of TILA, RESPA, the Fair Credit Reporting Act, the FDCPA, as well as state law claims, including discharge of the Mortgage and quiet title. Obtained dismissal of all claims

Represented a mortgage servicer in New York County Supreme Court in a lawsuit brought by borrower alleging improper notice of a non-judicial sale of a cooperative apartment. Obtained summary judgment in favor of mortgage servicer and denial of borrower's request for a preliminary injunction

Education and Credentials

Education

Seton Hall University School of Law, J.D., *cum laude*, 2008, Order of the Coif, Distinguished Public Interest Scholars Program

Practices & Industries

Bankruptcy & Restructuring

Class Action Litigation

Complex Commercial Litigation

Consumer Finance & Creditors' Rights Litigation

Shareholder and Securities Litigation

University of Scranton, B.S., *summa cum laude*, 2005, Undergraduate Student Paper Award, Presidential Honors Recognition, Frank O'Hara Award

Admissions

State of New Jersey

State of New York

U.S. District Court, District of New Jersey

U.S. District Court, Southern District of New York

U.S. District Court, Eastern District of New York

U.S. Court of Appeals for the Third Circuit

Recognition and Community

No aspect of this advertisement has been approved by the highest court of any state. Prior results do not guarantee a similar outcome. See Awards Methodology.

Recognitions

Selected to the list of New Jersey *Super Lawyers*® Rising Stars, General Litigation, 2017-2018, 2022-2023

Recognized as an Empire State Counsel by the New York State Bar Association for pro bono commitment, 2014

Insights

Legal Updates for Mortgage Lenders and Servicers
February 29, 2024

NJ Foreclosure Law Will Have Multifaceted Impact on Lenders
January 23, 2024

The 11th Circuit Finds a Single Text Message Sufficient Injury for Article III Standing
July 26, 2023

Florida Legislature Passes Amendments to the FTSA
May 11, 2023

Questions Surround NY's Controversial New Foreclosure Law
February 14, 2023

Day Pitney Presents Webinar on New York's Controversial Foreclosure Abuse Prevention Act
January 9, 2023

FCC Concludes Ringless Voicemails Are 'Calls' Subject to the TCPA
November 28, 2022

NJ Supreme Court Clarifies Investor Rights in Tax Sale
November 21, 2022

New York Court of Appeals Adopts Commonsense Approach to Authenticating Screenshots of Text Messages
August 9, 2022

CFPB's Proposed Rule on Time-Barred Debt Disclosures
May 13, 2020

Tax Appeals, Residential Evictions, Postponed Due to COVID-19
March 25, 2020

NJ Court Confirms Standing Based on Lost Note Affidavit, When Loss Is Prior to Assignment
December 27, 2018

NY Appellate Court Rules On Foreclosure De-Acceleration of Debt
December 17, 2018

How NY Is Fighting Back Against 'Zombie' Properties
October 18, 2016

Servicers Face New Requirements on NY Vacant REOs
October 10, 2016

Lenders, Protect Your Place in Line
August 22, 2016

Borrower's Failure to Comply with TPPA Justifies Lender's Refusal to Modify Loan
March 24, 2015

News

Day Pitney Consumer Finance Team Secures Precedential Victory
February 18, 2021

Day Pitney Congratulates Our New Partners
January 20, 2017

Christina A. Livorsi
January 3, 2017

Day Pitney Promotes Five Partners
January 3, 2017

In The Media

"Big Fish in the Big Pond – Thriving at a Larger Law Firm," NJSBA 2026 Women's Leadership Conference
March 2, 2026

"Alternative & Non-Traditional Lending - The Good, the Bad & the Ugly," Navigating the Future, New Jersey State Bar Association Annual Meeting and Convention
May 15, 2024

"What Lawyers Must Know Re the Latest on the Banking Industry," NJICLE
October 19, 2023

"Loan Servicing Track – Best Practices & Risks of Servicing Loans in New York," New York Mortgage Bankers Association
October 5, 2023

"Ethics of Remote Lawyering," Association of the Federal Bar of New Jersey
November 4, 2022

Meet Day Pitney's Livorsi, the Woman Whose Big Courtroom Victory Continues to Reverberate Across 2 Sectors
New Jersey Law Journal, October 26, 2021

Inside the Fight Over New York's Foreclosure Laws
The Real Deal, August 9, 2021

NY high court revives foreclosure actions, clarifies law
Reuters Legal, February 19, 2021

NJBA Residential/Loan Servicing Committee Meeting
September 20, 2016

Dispositive Motions in the District of New Jersey
New Jersey Lawyer Magazine, August 11, 2015

Day Pitney Mentioned in Empire State Counsel 2014 Honorees
New York State Bar Association, April 1, 2015

STEFANI C SCHWARTZ

SENIOR PARTNER

Bar Admission:

- New Jersey, 1996
- Florida, 1997

Court Admission:

- U.S. District Court District of New Jersey, 1996
- U.S. Court of Appeals 3rd Circuit, 2002

Education:

- Gettysburg College, BA 1991
- Rutgers University, MPA 1993
- Rutgers Law School, Camden, JD 1996

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Stefani Schwartz has devoted her legal career to representing employers in all aspects of employment law, including discrimination, harassment, retaliation, and wrongful termination matters. She is a leading practitioner in the field whose advice is often sought after.

No matter the size of the company, or whether it is a public or private entity, Stefani dedicates herself to counseling her clients and ensuring that proper and effective employment policies are in place. In-house counsel, human resource professionals, and risk managers alike look to her for assistance in hiring, firing, and disciplining employees. In addition, employers rely on her counseling with regard to compliance issues relating to discrimination, harassment, leaves of absence, wage and hour laws, and restrictive covenants. Stefani's expertise is called upon to conduct internal investigations in a timely and efficient manner.

Stefani has represented hundreds of clients in state and federal court proceedings, arbitration proceedings, and before administrative agencies such as the Equal Employment Opportunity Commission ("EEOC") and the New Jersey Division on

Civil Rights ("DCR"). She has several reported cases and has been successful with jury and non-jury trials.

Stefani is an active member of the legal and non-legal community, serving on many boards and committees for nonprofit organizations, banks, and professional associations. She is regularly asked to speak on areas such as sexual harassment and discrimination in the workplace, employment policies and handbooks, and employment law at seminars and conferences throughout the state.

Stefani was featured and honored in 2012 by NJBIZ as one of the "Best Fifty Women in Business"*. Beginning in 2012 she was named to the New Jersey "Rising Star" list * then ultimately, since that time to the present, she has been named to the New Jersey Super Lawyers* list in the area of Labor and Employment Law. Furthermore, in 2015 she was named to the New Jersey Top 50 Women Lawyers by the "Super Lawyers"* publication, and more recently, Stefani was recognized in the 2024 edition of *The Best Lawyers in America®* for her work in Labor Law – Management.

Stefani is motivated by more than professional accolades as she is dedicated to supporting women, most recently serving as the North Jersey Chair, American Heart Association, Go Red for Women Luncheon.

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