

SORAZAM BETHUNE,

Petitioner,

v.

MTA LONG ISLAND BUS,

Respondent.

On Petition for Writ of Certiorari to the
New York State Court of Appeals

BRIEF IN OPPOSITION

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resort in the forum state – that is, the New York State Court of Appeals – and any court of last resort of any other state or the United States Court of Appeals.

Indeed petitioner makes no such claim.

Rather, in the state court proceedings petitioner sought to recover for personal injuries she claimed to have sustained by reason that the local commuter bus on which she was a passenger allegedly drove in an unsafe manner. An action was brought against the public authority bus company on a theory that its bus operator was negligent in the manner in which he drove the bus, *but the jury found otherwise*. A judgment was entered after a jury verdict in respondent's favor and plaintiff's (petitioner's) complaint thereby dismissed. Petitioner failed to timely appeal the judgment, a circumstance she attributes to the fault of her then trial counsel. But such is collateral to the subject matter of the personal injury action she brought, and this is *not* the forum to seek redress from, or as a result of, any action or inaction of her former counsel.

formerly a wholly owned subsidiary of the Metropolitan Transportation Authority, a public benefit corporation created by New York State Public Authorities Law §1263. MTA Long Island Bus ceased operations as of December 31, 2011.

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