country—especially in Houston—is not necessarily a compliment. The leadership at Enron (many of whom are now convicted felons) were frequently described as the "smartest guys in the room."[15] Thus, a statement of this nature, especially in this courthouse, is not indicative of prejudice or bias, nor is it even necessarily a compliment.

The portion of the record that most corresponds with Appellant's claim that the judge told him he "knows nothing" appears to be a statement made during the hearing held on March 9, 2020. The Appellant contends that this was clearly offensive because he had earlier explained to the judge that he was a graduate of Stanford and the Massachusetts Institute of Technology and a member of Mensa. The circumstances surrounding the judge's comments is important. It occurred at a point in a hearing where the court was explaining to Van Deelen the technical aspects of, among other things, putting on expert testimony, the possibility of having to contend with a *Daubert* motion, and when and how the court would address the issue of whether a "stalking horse" buyer would actually perform. (Bk. 20-30336, Doc. No. 664 at 30:14–15). This exchange did not entail any criticism of Appellant. Many extremely gifted lawyers do not know how to properly reply to a *Daubert* motion or handle a *Daubert* hearing or the intricacies of handling a direct and/or cross-examination of expert witnesses, and many lawyers who are not familiar with bankruptcy proceedings would need guidance.

6. The Bankruptcy Court's Alleged Corruption

Appellant claims to have received an anonymous letter that accused Judge Jones of corruption. There is no evidence to suggest that Van Deelen's recitation as to how he came by this "letter" is false. He filed a copy of that letter along with the addendum to his motion to disqualify Judge Jones. (Adv. 20-3309, Doc. No. 39). This Court has reviewed the letter and determined that:

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[15] *See* MCLEAN AND ELKIND, THE SMARTEST GUYS IN THE ROOM—THE AMAZING RISE AND SCANDALOUS FALL OF ENRON (2003).

1) the contents and sender of the letter have not, and perhaps cannot, be verified; and 2) Appellant's general accusation of corruption to the extent it is based upon this "letter" is unsupported by any facts and therefore does not demonstrate that bias or partiality existed.

The Court notes that the "letter" is unsigned, contains unsupported allegations of a scurrilous nature, and contains no indicia of personal knowledge of authenticity from anyone. (*Id.*). Not even Appellant claims the allegations are true. This form of unsupported character assassination has no place in any court proceeding and cannot be grounds for recusal.

7. The Composite Effects of Van Deelen's Complaints

Despite some of the imprecise citations, this Court has reviewed the record as thoroughly as it can and discussed herein the most serious of Appellant's individual complaints. None of the court's actions of which Van Deelen complains individually would warrant a judge's recusal. This discussion does not, however, completely resolve Appellant's argument. The next issue is whether they present a different picture when combined. The Fifth Circuit test regarding recusal is whether a well-informed, thoughtful, and objective observer considering the entirety of the proceedings would find that a judge's impartiality might reasonably be in question. *Andrade*, 338 F.3d at 454–55; 28 U.S.C. § 455. The movant (in this case Appellant) must demonstrate the court's bias or particularity by clear and convincing evidence. *Kinnear-Weed Corp.*, 441 F.2d at 634.

It has been the rule for some time that judicial rulings or acts or omissions during court proceedings are rarely grounds for recusal absent some expression of strongly held prejudice or favoritism. *Liteky v. United States*, 510 U.S. 540, 555 (1994). Expressions of anger, annoyance, or impatience do not satisfy this standard, either. *Id.* at 555–56. Moreover, a judge's actions in handling his or her docket and conducting hearings and trials—even if they seem rigid or heavy-handed—are also not grounds for recusal. *See Sieber & Calicutt v. Sphere Drake Ins. Co.*, 227 F.