

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

GEORGE OUZOUNIAN, P/K/A MADDOX,
and JANE DOE,

Plaintiffs,

-against-

DAX HERRERA P/K/A DICK MASTERSON,
FOUNDATION DIGITAL, LLC, GREG BOSER,
LOREN BAKER, CMGRP, INC. D/B/A WEBER
SHANDWICK, JOSHUA KAUFMAN,
ASTERIOS KOKKINOS, TREVOR BIRT,
PATREON, INC., and JORDAN COPE,

Defendants.

Index No. 656779/2017

Oral Argument Requested

**NOTICE OF
MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the annexed Affirmation of Joshua Kaufman, Esq. dated January 10, 2018, and the exhibit thereto; the Affirmation of Michael M. Munoz, Esq. dated January 10, 2018, and the exhibits thereto; and the supporting Memorandum of Law, dated January 10, 2018; Defendants CMGRP, Inc., d/b/a Weber Shandwick (“WS”) and Joshua Kaufman (“Kaufman”) will move this Court in the Motion Submission Part, Room 130 of the New York County Courthouse for the Supreme Court of the State of New York, located at 60 Centre Street, New York, New York, 10013, on March 15, 2018, at 9:30 a.m. or as soon thereafter as counsel can be heard, for (i) an Order pursuant to New York Civil Practice Law and Rules (“CPLR”) § 3211(a)(1) and (7), dismissing, with prejudice, the Ninth, Tenth, Eleventh and Twelfth Causes of Action asserted against WS and Kaufman in the Complaint in this Action, (ii) for such other and further relief as the Court may deem just and proper. A copy of the Complaint is attached to the Affirmation of Michael M. Munoz.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR § 2214(b), answering affidavits and memoranda of law, if any, are to be served upon the undersigned no later than February 23, 2018, and reply affidavits and memoranda of law, if any, are to be served no later than March 13, 2018.

Dated: New York, New York
January 10, 2018

GOLENBOCK EISEMAN ASSOR BELL
& PESKOE LLP

By: 

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d/b/a Weber Shandwick and Joshua Kaufman*

To: All counsel of record (via NYSCEF)