

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

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

Plaintiffs',

Index No. 656779/2017
Motion Seq., # 5

- 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.

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PLEASE TAKE NOTICE, that upon the annexed Affidavit of George Ouzounian (p/k/a Maddox), sworn to on the 12th day of February, 2018, the Affirmation of Kevin Landau, and all exhibits annexed thereto, the accompanying Memorandum of Law, and all pleadings and prior proceedings herein, Plaintiff will move at the New York County Supreme Court, before the Hon. Charles E. Ramos, at the Motions Submissions part, Room 130, 60 Centre Street, on the 27th day of February 2018 at 9:30 pm, or as soon thereafter as counsel may be heard, for an order, pursuant to CPLR 3211(d) deny Defendants Motion to Dismiss, without prejudice, and allow Plaintiffs to conduct discovery on personal jurisdiction.

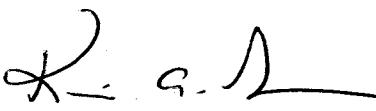
PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b) and 2103(b), reply papers, if any, are to be served so as to be received by the undersigned at least one (1) day prior to the return date on this cross-motion.

Dated: New York, New York

February 12, 2018

Respectfully submitted,

THE LANDAU GROUP, PC

By: 

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Attorneys for Plaintiffs' Ouzounian and Blum