

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS: IAS PART 52

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**SUNDEEP SINGH SUCHDEV, LUCAS
SHAPIRO, SHRUTI PAREKH, JESSICA
TURNER, LILI SALMERON, AND
SANJEEVAN THARMARATAM,**

Index No.: 518435/2020

Plaintiffs,

- against -

**NOTICE OF MOTION
FOR MONEY
JUDGMENT AND
PENDENTE LITE USE
AND OCCUPANCY**

**JUDITH GRUNBAUM, MOSHE DEUTSCH,
SAMUEL GRUNBAUM, AND YHT
MANAGEMENT INC.,**

Defendants.

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PLEASE TAKE NOTICE that upon the annexed affirmation of Jonathan B. Schreier, Esq., dated January 14, 2021, the annexed Affirmation of Judith Grunbaum, affirmed to on January 14, 2021; the accompanying memorandum of law, and upon all of the exhibits annexed hereto, the undersigned will move this Court via MICROSOFT TEAMS at an IAS Part 52 at the Courthouse located at 360 Adams Street, Brooklyn, New York 11201, on the **4th day of February 2021 at 9:30 am** or as soon thereafter as counsel can be heard for an Order :

- a. Pursuant to Real Property Law (“RPL”) §220 and Real Property Actions and Proceedings Law (“RPAPL”) §601:
 - i. Directing Shapiro to pay all outstanding rent through January 31, 2021 in the amount of \$17,100.00; and
 - ii. Directing Singh to pay all outstanding rent through January 31, 2021 in the amount of \$17,100.00; and
 - iii. Directing Parekh to pay all outstanding use and occupancy due through January 31, 2021 in the amount of \$103,350.00; and

- iv. Directing Tharmarantam to pay all outstanding use and occupancy due through January 31, 2021 in the amount of \$64,350.00; and
 - v. Directing Turner to pay all outstanding use and occupancy due through January 31, 2021 in the amount of \$27,300.00; and
 - vi. Directing Salmeron to pay all outstanding use and occupancy due through January 31, 2021 in the amount of \$44,850.00; and
 - vii. Directing Shapiro to pay ongoing rent of \$300.00 per month, *pendente lite*; and
 - viii. Directing Singh to pay ongoing rent of \$300.00 per month, *pendente lite*; and
 - ix. Directing Parekh to pay ongoing use and occupancy of \$1,950.00 per month, *pendente lite*; and
 - x. Directing Tharmarantam to pay ongoing use and occupancy of \$1,950.00 per month, *pendente lite*; and
 - xi. Directing Turner to pay ongoing use and occupancy of \$1,950.00 per month, *pendente lite*; and
 - xii. Directing Salmeron to pay ongoing use and occupancy of \$1,950.00 per month, *pendente lite*; and
- b. Granting Defendants such other, further and different relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), answering papers and any notice of cross-motion, with supporting papers, if any, must be served upon the undersigned at least seven (7) days before the return date of this motion.

Dated: New York, New York
January 14, 2021

BORAH, GOLDSTEIN, ALTSCHULER,
NAHINS & GOIDEL, P.C.

By: *Jonathan B. Schreier*
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To: Communities Resist
Freshfields Bruckhaus Deringer US LLP
(via NYSCEF)
Attorneys for Plaintiffs