

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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JANE DOE,

Index No.: 520605/2020

Plaintiff

**NOTICE OF
CROSS-MOTION**

-against-

*Assigned to:
Hon. Loren Baily-Schiffman*

ANONYMOUS # 1, an individual, and
ANONYMOUS #2-4, corporate entities,

**Return Date:
September 23, 2021**

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed affirmation of Michael A. D’Auria dated the 16th day of September, 2021, the exhibits annexed thereto and upon all the pleadings and proceedings had herein, the undersigned will move this Court at Part 72, before the Honorable Justice Loren Baily-Schiffman, at the Courthouse located at 360 Adams Street, Brooklyn, New York 11201 on the 23rd day of September, 2021 at 9:30 o’clock in the forenoon of that day for an Order: (1) Granting Defendant Anonymous #3 summary judgment on its counter claim for defamation *per se* and holding an inquest to calculate the money damages sustained by Defendant Anonymous #3 by Plaintiff’s defamatory statements; and (2) for such other further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that any answering Affirmations and/or Affidavits must be served upon the undersigned no later than one (1) day prior to the return date hereof pursuant to CPLR §2214(b).

Dated: Woodbury, New York
September 16, 2021

MILBER MAKRIS PLOUSADIS
& SEIDEN, LLP

By: *Michael A. D'Auria*

Michael A. D'Auria, Esq.
Attorneys for Defendant
Anonymous #3
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Our File No.: 532-20730

TO:

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