

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

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GEORGE OUZOUNIAN, P/K/A MADDOX, and
JESSICA BLUM,

Plaintiffs’,

Index No. 656779/2017
Motion Seq., # 6

- 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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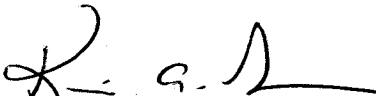
PLEASE TAKE NOTICE, that upon the annexed Affirmation of Kevin A. Landau, sworn to on the 14th day of March, 2018, , and all exhibits annexed thereto, the accompanying Memorandum of Law, and all pleadings and prior proceedings herein, Plaintiffs will move at the New York County Supreme Court, before the Hon. Charles E. Ramos, at the Motions Submissions part, Room 130, 60 Centre Street, on the 2nd day of April at 9:30 pm, or as soon thereafter as counsel may be heard, for an order, pursuant to 22 N.Y.C.R.R. 130-1.1[a] granting their motion in its entirety, and awarding sanctions against Greenberger, Munoz, and their respective law firms, in the maximum amount of \$10,000.00; and reasonable attorneys fees and costs in the amount of \$7,500.00.

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
March 14, 2018

Respectfully submitted,

THE LANDAU GROUP, PC

By: 

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Attorneys for Plaintiffs' Ouzounian and Blum