

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

CONGREGATION HAKSHIVAH, d/b/a/  
GEMACH L'SIMCHOS

Plaintiffs,

- against -

HERSH DEUTSCH and  
DEUTSCH VENTURE CAPITAL LLC,

Defendants.

Index No.

**AFFIRMATION OF STEVEN Y.  
YUROWITZ IN SUPPORT OF  
PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER**

STEVEN Y. YUROWITZ, an attorney duly licensed to practice law in the State of New York, affirms the following under penalties of perjury:

1. I am a member of the law firm of Newman & Greenberg LLP, attorneys for the Plaintiff, in the above-captioned action. I am fully familiar with the facts and circumstances surrounding this matter based upon a review of the file maintained by this office in the ordinary course of business and discussions with our client and others.

2. I submit this Affirmation in support of Plaintiff's motion for a temporary restraining order.

3. Pursuant to Uniform Rule 202.7(f), Defendants were advised that the Plaintiff would be presenting an Order to Show Cause with Temporary Restraining Order before a Justice of this Honorable Court on the 16th day of January 2019, at 360 Adams Street, Brooklyn, New York 11201, at Room 295, at 2:00 p.m.

3. On the 14<sup>th</sup> day of January 2019, I sent an email to Defendants' attorney, Aaron Twersky, Esq., advising counsel that I would be presenting this matter at 2:00 PM the next day,

i.e., January 15, 2019. To accommodate the scheduling needs of counsel for plaintiff and defendant we agreed to adjourn the presentment of this matter until January 16, 2019 at 2:30 p.m.

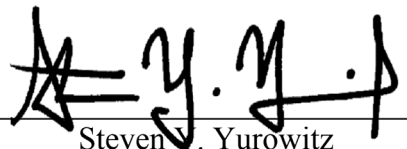
4. Attached as Exhibit A is a copy of the Summons filed commencing the above action.

5. Attached as Attached as Exhibit B is the Order of a Justice of this Court in *Grab It v. Moishe Katz*, Index No. 502621/18, granting in part a temporary restraining order against the defendants prohibiting them from initiating any chargeback disputes for charges involving the plaintiff.

6. Attached as Exhibit C is the Decision and Order granting, in part in *Health Peak, Inc. v. Torim*, Index No. 501396/16, an injunction against the defendants from disputing as unauthorized certain charges made on their credit cards.

7. As described in the accompanying Memorandum of Law, plaintiff seeks expedited discovery from defendants. A copy of plaintiff's proposed discovery demands are annexed hereto as Exhibit D.

Dated: New York, New York  
January 16, 2019

  
Steven Yurowitz