
HARRIS, ST. LAURENT
AND CHAUDHRY LLP

January 12, 2018

VIA ECF

The Honorable Deborah Kaplan
Administrative Judge
Supreme Court, New York County
60 Centre Street, Room 600
New York, NY 10007

**Re: George Ouzounian, p/k/a Maddox, and Jane Doe v. Dax Herrera,
p/k/a Dick Masterson, et. al., Index No. 656779/2017 (Sup. Ct., NY
County)**

Dear Justice Kaplan:

This firm represents Defendants Patreon, Inc. and Jordan Cope in the above-captioned action pending in the Supreme Court for New York County. Earlier today counsel for Defendants CMGRP, Inc., d.b.a. Weber Shandwick (“WS”), and Joshua Kaufman filed a letter pursuant to Section 202.70(e) of the Uniform Rules for the Trial Courts (“Uniform Rules”) to apply for transfer of this action into the Commercial Division [NYSCEF No. 49]. On behalf of Defendants Patreon and Cope, we hereby join in that request.

As explained by Defendants WS and Kaufman, the complaint filed by Plaintiffs George Ouzounian, p/k/a Maddox, and Jane Doe alleges sixteen causes of action against ten defendants and seeking \$20 million in damages, thereby meeting the monetary threshold for the New York County Commercial Division. *See* Uniform Rules, Section 202.70(a). Furthermore, the commercial disputes in this case fall within the standards set out in Section 202.70(b)(1), because the Complaint alleges various business torts (including unfair and deceptive trade practices and unfair competition, and tortious interference with a contract and a business relationship), fraud, misrepresentation, and other actions arising out of the parties’ business dealings (such as the claim against Patreon and Cope for alleged violations of New York General Business Law, Sections 349 and 350, and the Federal Trade Commission Act). Notably, Plaintiff Ouzounian, Defendant Herrera, Defendant Kokkinos, and Defendant Birt are all registered users of Patreon, an Internet-based platform, and the claims against Patreon and Cope implicate Patreon’s standard Terms of Use.

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Accordingly, on behalf of Defendants Patreon and Cope, I respectfully request that this action be transferred into the Commercial Division.

Sincerely,

/s/ L. Reid Skibell
L. Reid Skibell

cc: Counsel for all parties (VIA ECF)