

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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SUNDEEP SINGH SUCHDEV, LUCAS SHAPIRO,
SHRUTI PAREKH, JESSICA TURNER, LILI
SALMERON, and SANJEEVAN
THARMARANTAM,

Index No. 518435/2020

Plaintiffs,

-against-

JUDITH GRUNBAUM, MOSHE DEUTSCH,
SAMUEL GRUNBAUM, and YHT MANAGEMENT
INC.,

Defendants.

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**NOTICE TO TAKE THE
DEPOSITION UPON ORAL
EXAMINATION OF
PLAINTIFFS**

PLEASE TAKE NOTICE that, pursuant to CPLR Article 31, the testimony upon oral examination of plaintiffs SUNDEEP SINGH SUCHDEV, LUCAS SHAPIRO, SHRUTI PAREKH, JESSICA TURNER, LILI SALMERON, AND SANJEEVAN THARMARANTAM (“Plaintiffs”) will be taken before a notary public who is not an attorney, or an employee of an attorney, for any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the offices of Borah, Goldstein, Altschuler, Nahins & Goidel, P.C., 377 Broadway, 6th Floor, New York, New York, on the 28th day of December 2020, beginning at 10:00 a.m. and continuing thereafter from day to day, or at any subsequent recessed or adjourned date, until completed, concerning evidence material and necessary to the prosecution of this action.

PLEASE TAKE FURTHER NOTICE that Plaintiffs are required to produce at the deposition all documents, books, papers, records, correspondence, notes, memoranda and any other written materials (collectively “documents”) which evidence, concern, refer or relate to the claims and defenses of this action, for use upon the examination and for marking as exhibits, including, but not limited to, all documents referenced in Plaintiffs’ Complaint herein dated

September 29, 2020 and filed September 30, 2020 (the “Complaint”) (NYSCEF Doc. No. 1),¹ as well as all documents in Plaintiffs’ possession, custody or control which concern, refer or relate to the “Property” known as 70 South Elliott Place, Brooklyn, New York 11217.

Dated: New York, New York
November 30, 2020

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

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To: Communities Resist
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(via NYSCEF)
Attorneys for Plaintiffs

¹ “NYSCEF Doc. No. ___” refers to the document’s number on the electronic filing docket for this action.