

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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

Plaintiffs,

-against-

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

Defendants.

*At a motion term of IAS Part ____ of the
Supreme Court of the State of New York, County
of Kings, at the courthouse located at 360
Adams, Brooklyn, NY 11201 on the ____ day of
September, 2020.*

Index No. _____

**ORDER TO SHOW CAUSE WITH
TEMPORARY RESTRAINING ORDER**

Upon the accompanying affirmation of Stephanie R. Rudolph, Esq. dated September 29, 2020 and the exhibits attached thereto, the affidavits of Sundeep Singh Suchdev, Lucas Shapiro, and Shruti Parekh dated September 18, 2020, the affidavit of Lili Salmeron dated September 26, 2020, the affidavit of Jessica Turner dated September 27, 2020, the exhibits attached thereto, the memorandum of law, dated September 29, 2020, and upon all the prior papers and proceedings in this matter, let the Defendants show cause before me or one of the Justices in this Court, located at 360 Adams Street, Brooklyn, New York, in Part ____, Room ____, on the 30 day of September, 2020, at 9:30 a.m., or as soon thereafter as counsel can be heard, why an Order should not be entered:

1. Preliminarily enjoining Defendants and/or their principals, agents, servants, representatives, employees and associates from:

- A. Entering 70 South Elliott Place, Brooklyn, NY 11217 (“House”), unless such entry is with the permission of one of the Plaintiffs or after reasonable notice has been provided as required by NYC Admin. Code § 25-101.

- B. Entering the House if not for the purpose of repairs that are immediately necessary to prevent damage to property or to prevent injury to persons.
- C. Entering the House after 5:00 PM (NYC Time) or on weekends unless for the purpose of repairs that are immediately necessary to prevent damage to property or to prevent injury to persons.
- D. Enjoining Defendant Samuel Grunbaum from coming within 50 feet of the House.
- E. Removing, evicting, or attempting to remove or evict any Plaintiff from their current dwelling unit at the House without a Court order enforced by a New York City Marshall.
- F. Harassing in any way any Plaintiff by any of the following conduct:
 - i. engaging in or threatening to engage in any conduct which interferes with or is intended to prevent such Plaintiff from the lawful occupancy of their dwelling unit at the House;
 - ii. interfering with or disturbing the comfort, repose, peace or quiet of such Plaintiff in the use and occupancy of such dwelling unit;
 - iii. inducing the Plaintiffs to vacate the dwelling unit including by, but not limited to, threatening Plaintiffs with eviction, physical harm, criminal action, or other unlawful actions;
 - iv. discontinuing or reducing essential services at the House;
 - v. removing the possessions of any of the Plaintiffs or lawful occupants or guests; or removing or changing locks to any entrance door to the House or dwelling units therein without providing a new lock and key; and/or
 - vi. commencing baseless eviction proceedings.

- G. Retaliating in any way against the Plaintiffs for exercising any of their rights under New York's housing laws (such as by bringing the instant complaint) and/or participating in activities of a tenant association, including by commencing baseless or frivolous proceeding against Plaintiffs.
- H. Removing any of Plaintiffs' property from their dwelling units or shared common areas at the Building unless such Plaintiff has been duly evicted pursuant to a court order.
- I. Communicating in any way with Plaintiffs concerning this action or any allegations herein outside the presence of counsel or by written communications;
- J. Surveilling Plaintiffs in the interior portions of the House, including by using technology that records audio or video recordings; and
- K. Granting such further relief that is just and proper.

Pending a hearing and determination of this request for preliminary injunctive relief, IT IS ORDERED that Defendants, their agents, and any persons in active concert with Defendants, are temporarily enjoined from the conduct enumerated above.

IT IS FURTHER ORDERED that personal delivery or service by Federal Express Standard Overnight of a copy of this Order and the papers upon which it is based upon Defendants or, if represented, upon their counsel on or before _____ shall be good and sufficient service. Plaintiff shall also post a copy of this order on the front door into 70 South Elliott, Brooklyn, NY 11207 and on room 2nd Floor/Front of 70 South Elliott on or before _____. Proof of service of this Order and the papers upon which it is based upon Defendants or, if represented, upon their counsel, and proof of posting of this Order as specified herein, shall be filed with the Court on or before the return date.

IT IS FURTHER ORDERED that any papers offered in opposition to the instant Order to Show Cause shall be served upon counsel for Plaintiffs at srudolph@communitiesresist.org and kyle.lakin@freshfields.com on or before _____, whereupon Plaintiffs shall serve any reply on or before

_____.

Dated: Brooklyn, New York
September __, 2020

J.S.C.