

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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JONATHAN REICH,

Index No. 156787/16

Plaintiff,

- against -

**NOTICE OF MOTION
TO DISMISS IN LIEU
OF AN ANSWER**

CHARLES C. HALE, WARREN ST. JOHN, JESSICA L. SAWYER,
DMEP CORPORATION d/b/a HALE GLOBAL, PLANCK, LLC
d/b/a PATCH MEDIA and PATCH MEDIA CORP.

Defendants.

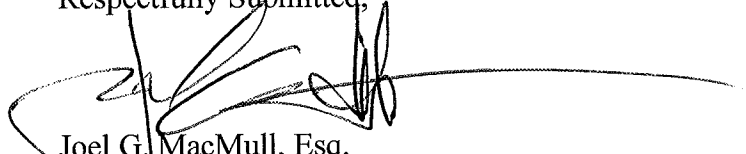
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PLEASE TAKE NOTICE that upon the annexed Affirmation of Joel G. MacMull, dated September 22, 2016, the exhibits annexed thereto, Defendants' Memorandum of Law in Support of Their Motion to Dismiss the Complaint and for Sanctions, dated September 22, 2016, and all prior pleadings had herein, defendants will move this Court at the Motion Submissions Part, Room 130, 60 Centre Street, Supreme Court of the State of New York, New York County, on October 28, 2016, at 9:30 a.m. or as soon thereafter as counsel can be heard, for an Order granting Defendants' Motion to Dismiss the Complaint and for Sanctions pursuant to CPLR § 3211 and 22 N.Y.C.R.R. § 130-1.1(a).

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR §2214(b), answering affidavits, and responsive papers, if any, are required to be served upon the undersigned at least seven days before the return date of this motion.

Dated: September 22, 2016
New York, New York

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Joel G. MacMull', is written over a horizontal line. The signature is stylized and extends across the line.

Joel G. MacMull, Esq.

ARCHER & GREINER, P.C.

44 Wall Street, Suite 1285

New York, New York 10005

Tel: 201-342-6000

Fax: 201-342-6611

Email: jmacmull@archerlaw.com

Attorneys for Defendants