

Subs P
11-23-18

Supreme
CIVIL COURT: CITY OF NEW YORK
COUNTY OF NEW YORK

INDEX No.153554/2017
Hon. Gerald Lebovits
60 Centre Street, Room 334
New York, New York 10007

-----X
GILDRED CAROLINA

Plaintiff,
- against -

NOTICE OF MOTION

Motion to Compel
Plaintiffs Admissions, Interrogatories,
Productions Deemed Admitted and
Plaintiffs Complaint be Striked.

Defendant.
-----X

FOSTER MICHAEL

PLEASE TAKE NOTICE that the undersigned will move this Court at a Motions Part, at the Courthouse located at 60 Centre Street, Room 130, New York, New York 10007, on Nov 23rd, 2018, at 9:30AM, or as soon thereafter as counsel may be heard, for an Order, pursuant to CPLR 3126, compelling Plaintiff's Failure to comply with Defendant's discovery demands Deemed Admitted, and in the interim, striking the Complaint of Plaintiff based upon its wanton noncompliance with discovery, awarding Defendant the costs of this motion, and granting sanctions and such other and further relief as this Court deems just and proper.

This action does not appear on any trial calendar of this Court.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served at least two (2) days before the return date of this motion.

Dated: New York, New York
Nov 13th, 2018

[Handwritten Signature]

Mr. Foster Michael
Pro Se Defendant
265 LAFAYETTE STREET
9D
NEW YORK, NEW YORK
10012
212-689-2250

SUPREME COURT
STATE OF NEW YORK
APPROVED
I.A.S. MOTION
SUPPORT OFFICE
 I-MOT X-MOT
[Handwritten Initials]
11-13-18
CLERK'S
INITIALS

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AND FEE PAID
NOV 13 2018
COUNTY CLERK'S OFFICE
NEW YORK

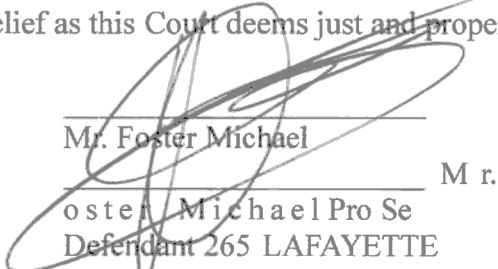
9. Upon information and belief, Plaintiff has wantonly failed to disclose information which ought to be disclosed.

WHEREFORE, it is respectfully requested that this Court grant an Order, pursuant to CPLR 3126, compelling Plaintiff failure to comply with Defendant's discovery demands as Deemed Admitted, and in the interim, strike the Complaint of Plaintiff based upon its wanton noncompliance with discovery, awarding Defendant the costs of this motion, and granting such other and further relief as this Court deems just and proper.

Affirmed to before me this
13 day of Nov, 2018



CHU YING LI
Notary Public, State of New York
No. 01LI6303092
Qualified in New York County
Commission Expires May 12, 2022


Mr. Foster Michael
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