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NYSCEF DOC. NO. 40

INDEX NO. 717941/2018

RECEIVED NYSCEF: 04/19/2019

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

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In the Matter of the Application of

STEVEN TELANO and VINCENT MONFREDO,

Petitioners.

For the Judicial Dissolution of Eagle Security Group, Inc.

Respondent,

pursuant to Business Corporation Law § 1104-a, et. seq.

AND GIACCHINO BRUCCULERI, RAYMOND C. WONG, LEO S. CINQUEMANI, ANTONIO GUADAGNINO, SALVATORE D. GIAMMANICO. GEORGE F. BRADLAU, MICHAEL J. TONE, SAIMA SICUREZZA SPA, and PHILIP KYRIACOU

Additional Party Respondents.

ECF CASE:

Index No. 717941/2018 (Hon. Justice Joseph Risi)

Return Date: May 17, 2019

Motion Seq. No.: 002

**NOTICE OF MOTION** 

PLEASE TAKE NOTICE, that upon the annexed affirmation of Anthony P. Colavita, Esq. dated April 19, 2019, the exhibits annexed thereto, the accompanying memorandum of law, and upon all the prior proceedings had herein, additional party respondents, George F. Bradlau and Michael J. Tone (the "B&T Respondents"), by their attorneys, L'Abbate, Balkan, Colavita & Contini, LLP, will move this Supreme Court of the State of New York, County of Queens, at the Courthouse located at 88-11 Sutphin Boulevard, Jamaica, New York 11435, on the 17th day of May, 2019, at 10:00 a.m. or as soon as counsel can be heard, for an Order pursuant to CPLR 3211(a)(1)

and (7) granting the B&T Respondents' Motion to Dismiss the Petition of Steven Telano and

Vincent Monfredo for dissolution of Eagle Security Group, Inc., pursuant to Business Corporation

Law §1104-a, and for an accounting, and for such other, further and different relief as this Court

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deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served and filed

by May 3, 2019, pursuant to an agreement between the parties.

DATED:

Garden City, New York

April 19, 2019

L'Abbate, Balkan, Colavita

& GONTINI, L.L.P.

By:

Anthony P. Colavita

Attorneys for Respondents

George F. Bradlau and Michael J. Tone 1001 Franklin Avenue, 3<sup>rd</sup> Floor

Garden City, New York 11530

(516) 294-8844

File No. 169L-102988

TO: Adam D. Glassman, Esq.
THE LAW OFFICE OF ALAN C. GLASSMAN
Attorneys for the Petitioners
Steven Telano and Vincent Monfredo
34 Atlantic Avenue, Suite 200
Lynbrook, New York 11563
(516) 823-1800

Bryan F. Lewis, Esq.
LEWIS JOHS AVALLONE AVILES, LLP
Attorneys for Respondents
Giacchino Brucculeri, Raymond C. Wong
and Leo S. Cinquemani
One CA Plaza, Suite 225
Islandia, New York 11749
(631) 755-0101