

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

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In the Matter of	:	
CRISTINA QUAZZO,	:	
	:	
Petitioner,	:	
	:	
-against-	:	Index No. 652282/2010
	:	Part 60
9 CHARLTON STREET CORPORATION, et al.,	:	
	:	
Respondents.	:	ORAL ARGUMENT
	:	REQUESTED

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CRISTINA QUAZZO, both individually and	:	
derivatively on behalf of 9 CHARLTON STREET	:	
CORPORATION, PEARLBUD REALTY	:	Index No. 652002/2011
CORPORATION, and ORBIS INTERNATIONAL	:	Part 60
CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
9 CHARLTON STREET CORPORATION, et al.,	:	
	:	
Defendants.	:	
	:	

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**NOTICE OF MOTION TO STRIKE
RESPONDENTS/DEFENDANTS' JURY DEMANDS**

PLEASE TAKE NOTICE, that upon the annexed the Affirmation of Mark A. Berube, Esq., dated December 16, 2019, and the exhibits annexed thereto; the accompanying Memorandum of Law; and upon all of the papers and proceedings heretofore had herein, that petitioner/plaintiff Cristina Quazzo ("Petitioner/Plaintiff"), by her attorneys, will move this Court at the New York Supreme Court, Motion Room 130, 60 Centre Street, New York, New York, on


the 13th day of February, 2020 at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order: (i) striking all of the jury demands filed by respondents/defendants 9 Charlton Street Corporation, Pearlbud Realty Corporation, Orbis International Corporation, Ugo Quazzo, and Stephen Quazzo; (ii) directing that all claims, defenses, and issues be tried to the Court; (iii) in the alternative, should the Court find that certain claims, defenses, or issues can be tried to a jury, directing that the Court try and determine all nonjury questions before impaneling a jury; and (iv) granting her such additional relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the briefing schedule stipulated to on December 3, 2019, answering papers are required to be served upon the undersigned by January 20, 2020.

Dated: New York, New York
December 17, 2019

Respectfully submitted,

BARTON LLP

By: 
Mark A. Berube

711 Third Avenue, 14th Floor
New York, New York 10017
(212) 687-6262

Attorneys for Petitioner/Plaintiff

TO: KAPLAN RICE LLP
Michelle A. Rice
142 W 57th Street, Suite 4A
New York, New York 10019
(212) 333-0227

*Attorneys for Ugo Quazzo, Pearlbud Realty Corporation,
9 Charlton Street Corporation, and Orbis International Corporation*

MOLOLAMKEN LLP
Benoit Quarmby
540 Madison Avenue
New York, New York 10022
(212) 607-8160

Attorneys for Stephen Quazzo