FILED: KINGS COUNTY CLERK 07/01/2021 04:56 PM

NYSCEF DOC. NO. 14

INDEX NO. 504057/2020

RECEIVED NYSCEF: 07/01/2021

COUNSELORS:

PLEASE TAKE NOTICE, that upon the annexed Affirmation of Fred L. Seeman, dated July 1, 2021, the Affidavit of Isaac Azaria, sworn to on June 29, 2021, and the exhibits annexed thereto, and upon all prior pleadings and proceedings heretofore had herein, the Plaintiff, by his attorneys, the Law Offices of Fred L. Seeman, will move this Court at an IAS Part to be assigned, of the Supreme Court of the State of New York, Kings County Courthouse, located at 360 Adams Street, Brooklyn, New York 11201 on August 12, 2021, at 9:30 o'clock in the forenoon of that day, or as soon thereafter as counsel may be heard, for an Order:

- 1. pursuant to CPLR §3215 granting the Plaintiff a default judgment against the Defendants based upon their failure to appear, answer or otherwise move with respect to the pleadings herein;
- 2. directing the dissolution of Defendant, 695 Monroe, LLC, pursuant to Limited Liability Company Law §702 and, upon dissolution, appointing a receiver to facilitate the wind up of 695 Monroe;
- 3. granting a judgment for legal fees to be determined at a legal fees hearing; and
- 4. for such other and further relief as to the court deems just and proper

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

accordance with CPLR §2214(b).

Dated:

New York, New York

July 1, 2021

Yours, etc

Law Offices of Fred L. Seeman

By: Fred L. Seeman, Esq.

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