

THE DWECK LAW FIRM, LLP

1 ROCKEFELLER PLAZA

NEW YORK, N.Y. 10020

JACK S. DWECK*
H.P. SEAN DWECK**

CHRISTOPHER S. FRASER***

ROURKE T. FEINBERG****

ERIC J. SCHMERTZ
1925-2010

* ADMITTED TO NY CONN. AND FLA. BARS
** ADMITTED TO NY NJ AND PA. BARS
*** ADMITTED TO NY AND NJ BARS
**** ADMITTED TO NY BAR

TELEPHONE: (212) 687-8200

FACSIMILE: (212) 697-2521

WWW.DWECKLAW.COM

WESTCHESTER OFFICE
901 NORTH BROADWAY
NORTH WHITE PLAINS, N.Y. 10603

NOT FOR SERVICE OF PAPERS

CONNECTICUT OFFICE
GRAVEL ISLAND ROAD
NEW CANAAN, CT 06840

(203) 972-3000

NOT FOR SERVICE OF PAPERS

August 4, 2023

VIA NYSCEF

Honorable Leon Ruchelsman
Justice of the Supreme Court
State of New York, Kings County
360 Adams Street, Room 276
Brooklyn, NY 11201

Re: **Cesar Ramirez, et ano. v. Moneer Issa, et al.**
Supreme Court, Kings County Index No.: 521206/2023

Honorable Sir:

The undersigned are attorneys for the Plaintiffs in the above entitled action.

On July 25, 2023 and, again, on July 26, 2023, an Order to Show Cause in the above entitled action was submitted to the Clerk of the Ex Parte Part, which among other things, sought a Temporary Restraining Order and a request for a Preliminary Injunction against the Defendant, Moneer Issa, disbursing funds to himself, his wife and third parties outside of the normal course of business. Argument was heard by your Court attorney, Mark Kagan, on that Friday, July 26, 2022. To date, we have not had any communication with respect to whether the Order to Show Cause was signed, the Temporary Restraining Order granted, or a return date.

I am acutely aware of the overwhelming burdens faced by you in the Commercial Part. However, I respectfully call to your attention that since the submission of the Order to Show Cause for signature, the Defendant Issa in retaliation to this lawsuit has caused our client to be arrested and charged with larceny. Since the Plaintiff is a fifty percent owner of the restaurant that was arbitrarily closed down by the Defendant Issa, there can be no larceny since our client purchased the equipment from his own funds, the receipts for which are incorporated as Exhibit 6 in the Order to Show Cause. However, in the interim, we have learned that the Defendant Issa has clandestinely transferred \$400,000.00 from the bank account of the restaurant. The Defendant Issa

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has also secured a search warrant of the residence of the Plaintiff, Cesar Ramirez.

Mr. Ramirez has engaged the services of Jacob Laufer, an attorney who specializes in criminal defense work. Mr. Laufer has successfully secured the release of Mr. Ramirez from police custody with the cooperation of the Office of the District Attorney based upon his presentation of the receipts for the purchase by Mr. Ramirez of the equipment at the restaurant from his personal funds.

The circumstances in this matter are on a very precipitous stage and I call upon you to address this matter on an immediate basis in the interest of avoiding any further retaliation by Mr. Issa to the lawsuit now before you, or any further removal of company funds by the Defendant Issa.

I am forwarding a copy of this letter to the law firm of Glenn Agre Bergman & Fuentes, who have not officially appeared in this action, but who have stated that they represent Mr. Issa.

I extend my thanks to you for your immediate attention to the Order to Show Cause before you.

Respectfully yours,

THE DWECK LAW FIRM, LLP

A handwritten signature in blue ink that reads "Jack S. Dweck (CPA)". The signature is written in a cursive style.

Jack S. Dweck

JSD:gs

cc: Glenn Agre Bergman & Fuentes
(via email: info@glennagre.com)