

At the IAS Part __ of the Supreme Court of the State of New York held in and for the County of New York, at the Courthouse located at 60 Centre Street, New York, New York, on the __ day of August, 2006.

PRESENT

Hon. _____
Justice.

~~06111335~~

06602895

**IN THE MATTER OF THE APPLICATION OF
THOMAS ABRAHAM and PHILIP JOHN,
HOLDERS OF MORE THAN TWENTY PERCENT
OF ALL OUTSTANDING SHARES OF ELITE
TECHNOLOGY NY, INC.,**

Index No.:
(Date Filed:)

Petitioners,

**ORDER TO SHOW CAUSE
SEEKING CORPORATE
DISSOLUTION PURSUANT
TO BUSINESS
CORPORATION LAW
SECTIONS 1104-A(1)
AND (2)**

-against-

HANHUI LU and YONG HONG FAN

FILED
COUNTY CLERK, N.Y. COUNTY

AUG 17 2006

The basis of venue designated
is: situs of transaction at
issue

Respondents,

UNSIGNED
ORDER TO SHOW CAUSE
FOR THE DISSOLUTION OF ELITE
TECHNOLOGY NY, INC.

Petitioners' address:
Thomas Abraham
4 Jamesworthy Ct.
Marboro, New Jersey 07746

Philip John
25 Sunnyside Drive, Apt. 4H
Yonkers, New York 10705

UPON the annexed Verified Petition of THOMAS ABRAHAM AND PHILIP JOHN, the holders of forty nine (49%) percent of all outstanding shares of Elite Technology NY, Inc. (the "Corporation"), a domestic corporation organized and existing by virtue of the

laws of the State of New York and having its offices located at 16 West 36th Street, 9th Floor, New York, New York, and said Petitioners being entitled to vote in an election of directors of the Corporation, the Affidavit of Philip John, duly sworn to on August 16, 2006, together with the Exhibits annexed thereto, and Petitioners' Memorandum of Law, and it appearing therefrom that this case is one for dissolution as specified in the Business Corporation Law of the State of New York; it is hereby

ORDERED, that the Corporation, Respondents Hanhui Lu and Yong Hong Fan (the holders of all of the remaining outstanding shares of the Corporation), the New York State Tax Commission, the Attorney General and all other persons interested in the Corporation show cause before this Court on the __ day of September, 2006, at IAS Part __, Room __, at the Courthouse located at 60 Centre Street, New York, New York, at 9:30 a.m., or as soon thereafter as counsel may be heard, why an Order and Judgment should not be made and entered pursuant to Section 1104-a(1) and (2) of the Business Corporation Law of the State of New York, as follows:

A. Dissolving the Corporation;

B. Pending the dissolution of the Corporation, appointing a receiver, with the usual powers and directions, to take control of, run and operate the business of the Corporation;

C. That the Corporation and Respondents be required to provide a complete accounting to Petitioners of the financial activity and books and records of the Corporation for the past three (3) years; and

D. Awarding Petitioners such other and further relief as this Court deems just and proper under the circumstances, including but not limited to, their reasonable attorneys' fees and the costs and disbursements of this action; and it is further

ORDERED, that pending a hearing and determination of this application,

Respondents Hanhui Lu and Yong Hong Fan, and all persons interested in the Corporation be, and hereby are, enjoined and restrained from expending, disbursing, transferring or otherwise conveying any corporate funds, property or assets to or in favor of any shareholder, officer, director, employee or agent of the Corporation or in favor of or to any attorney at law, except as to non-shareholder employees in the ordinary course of business; and it is further

ORDERED, that the Corporation, Respondents Hanhui Lu, Yong Hong Fan, its officers, and its directors, shall on the return date of this application furnish to the Court a schedule of the corporate assets and liabilities, and the name and addresses of each shareholder and of each creditor and claimant, including any with unliquidated or contingent claims and any with whom the Corporation has unfulfilled contracts; and it is further

ORDERED, that pursuant to paragraph (c) of Section 1104-a of the Business Corporation Law, that, in addition to all other disclosure requirements, that Respondents Hanhui Lu and Yong Hong Fan, or those in control of the Corporation, no later than September ___, 2006, shall make available for inspection and copying to the Petitioner under reasonable working conditions the corporate financial books and records for the three (3) preceding years; and it is further

ORDERED, that service of a copy of this Order to Show Cause and the papers upon which it is based upon the Corporation, Respondents Hanhui Lu and Yong Hong Fan, the New York State Tax Commission and Attorney General shall be made in the manner provided by law and prescribed in Section 1106 of the Business Corporation Law; and it is further

ORDERED, that a copy of this Order to Show Cause be published by

Petitioner at least once in each of the three weeks immediately preceding the return date of this application, in the _____ and _____ newspapers published in the County of New York; and it is further

ORDERED, that answering and responsive papers, if any, to the instant application shall be served upon Petitioners' counsel at least seven (7) days prior to the return date of this proceeding.

ENTER:

J.S.C.

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

-----X
**IN THE MATTER OF THE APPLICATION OF
THOMAS ABRAHAM and PHILIP JOHN,
HOLDERS OF MORE THAN TWENTY PERCENT
OF ALL OUTSTANDING SHARES OF ELITE
TECHNOLOGY NY, INC.,**

Index No.:

VERIFIED PETITION

Petitioners,

-against-

HANHUI LU and YONG HONG FAN

Respondents,

**FOR THE DISSOLUTION OF ELITE
TECHNOLOGY NY, INC.**

-----X
**TO THE SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK:**

Petitioner THOMAS ABRAHAM, by his attorneys, Bauman Katz & Grill LLP, and Petitioner PHILIP JOHN (hereinafter Petitioners Thomas Abraham and Philip John will be collectively referred to as the "Petitioners"), by his attorneys, Allegaert Berger & Vogel LLP, as and for their Verified Petition, respectfully allege as follows:

1. Elite Technology NY, Inc. ("Elite") is a corporation duly organized and existing under the laws of the State of New York, with its office and principal place of business at 16 West 36th St., New York, New York 10018.
2. Petitioners are the holders of 98 shares of the common stock of Elite, which amount constitutes more than twenty (20%) percent of all the outstanding common shares.

3. Petitioners are each entitled to vote for the election of directors. No other class of shareholders are entitled to vote on any corporate matters.

4. The only other common shareholders of Elite are the Respondent, Hanhui Lu ("Henry") and Respondent Yong Hong Fan ("Jane") (collectively, the "Respondents"). Together, Henry and Jane own 102 shares or 51% of the outstanding shares of Elite.

5. None of the shares of Elite are listed on a national securities exchange or regularly quoted in an over-the-counter market by a member of a national or affiliated securities association.

6. Elite is not registered as an investment Company under an act of Congress entitled "Investment Company Act of 1940."

7. Upon information and belief, the Certificate of Incorporation of the Corporation designates the State of New York, County of New York, as the location of Elite's office.

8. Petitioners request that Elite be dissolved pursuant to §1104-a(1) and (2) of the Business Corporation Law because the persons in control of the corporation, Henry and Jane, are guilty of gross continuing and oppressive action toward each of the Petitioners and are wasting the property and/or assets of Elite in that:

a. On or about June 30, 2003, Petitioners and Respondents entered into an agreement whereby the Petitioners transferred assets of their business, Quantum Venture, Inc.), to Elite in exchange for a 49% interest in the common stock of Elite. Such agreement expressly and implicitly provided that Petitioners would contribute to Elite all their "expertise and knowhow in the industry" by dedicating themselves to work at Elite for at least five years in "their respective roles as partners of the company." The objectively reasonable expectation of

going concern, including the loss of several key employees and a material and substantial decline in Elite's revenues, cash flow and profitability.

10. Dissolution of Elite is the only feasible means whereby the Petitioners may reasonably expect to obtain a fair return on their investment. There has been a complete deterioration of the relationship between the parties, to wit, Petitioners have been unlawfully frozen-out of Elite.

11. Without immediate intervention by this Court, Elite will suffer immediate, material and irreparable injury and loss.

12. No remedy exists short of dissolution of Elite will properly protect the rights and interests of the Petitioners.

13. Petitioners have no adequate means of recovering their investment or equity, short of dissolution pursuant to §1104-a of the Business Corporation Law.

14. Pursuant to BCL section 1202(a)(1), a temporary receiver should be appointed forthwith so that Respondents cannot continue to waste, divert and dissipate the property and assets of Elite, and so that the assets of Elite will be lawfully preserved for distribution to Petitioners in connection with the instant dissolution proceeding.

15. There has been no prior application for the relief requested herein.

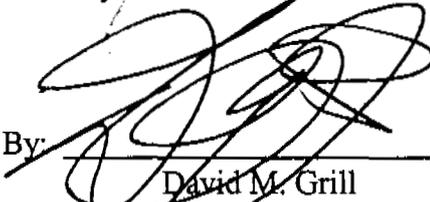
WHEREFORE the Petitioners, Thomas Abraham and Philip John, respectfully demand judgment as follows:

- A. An Order of this Court dissolving Elite Technology NY, Inc. in accordance with §1104-1 of the Business Corporation Law;
- B. Appointment of a receiver for Elite pursuant to the Provisions of §1202 of the Business Corporation Law;

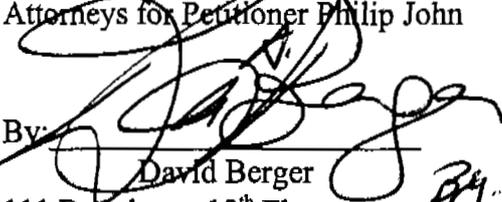
- C. As and against the Respondents, Hanhui Lu and Yong Hong Fan, jointly and severally, an amount to be determined at trial for Petitioners' actual damages and reasonable attorney's fees;
- D. That the Corporation and Respondents be required to provide a complete accounting to Petitioners of the financial activity and books and records of the Corporation for the past three (3) years; and
- E. Such other and further relief as this Court deems just, proper and equitable including, but not limited to, Petitioners' reasonable attorneys' fees and the costs and disbursements of this proceeding.

Dated: New York, New York
August 16, 2006

BAUMAN KATZ & GRILL LLP
Attorneys for Petitioner Thomas Abraham

By: 
David M. Grill
28 West 44th Street, Suite 900
New York, New York 10036
(212) 684-0300

ALLEGAERT BERGER & VOGEL LLP
Attorneys for Petitioner Philip John

By: 
David Berger
111 Broadway, 18th Floor
New York, New York 10006
(212) 571-0550

By: DMS

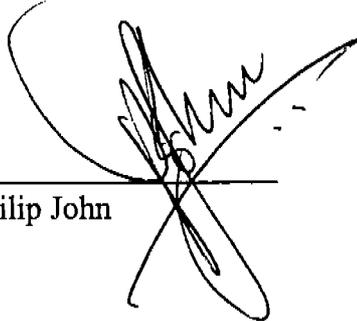
VERIFICATION

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

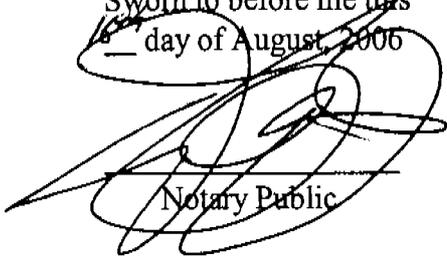
PHILIP JOHN, being duly sworn, deposes and says:

That deponent is one of the named petitioners herein, the deponent has read the annexed petition and knows the content thereof, and that the same are true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters deponent believes them to be true.

The sources of deponent's information and the grounds of deponent's belief as to all matters not herein stated upon deponent's knowledge are as follows: books and records in my possession.



Philip John

Sworn to before me this
16th day of August, 2006


Notary Public

DAVID M GRILL
Notary Public, State of New York
No. 02GR5017860
Qualified in Suffolk County
Commission Expires November 1, 2009

VERIFICATION

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

THOMAS ABRAHAM, being duly sworn, deposes and says:

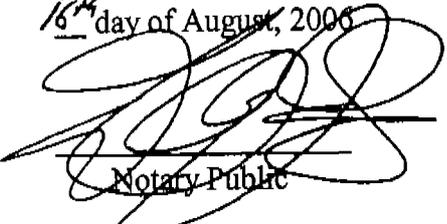
That deponent is one of the named petitioners herein, the deponent has read the annexed petition and knows the content thereof, and that the same are true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters deponent believes them to be true.

The sources of deponent's information and the grounds of deponent's belief as to all matters not herein stated upon deponent's knowledge are as follows: books and records in my possession.



Thomas Abraham

Sworn to before me this
16th day of August, 2006



Notary Public

~~DAVID M GRILL
Notary Public, State of New York
No. 02GR5017860
Qualified in New York County
Commission Expires Sept. 13, 19~~

DAVID M GRILL
Notary Public, State of New York
No. 02GR5017860
Qualified in Suffolk County
Commission Expires November 1, 2009

Index No.:

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

IN THE MATTER OF THE APPLICATION OF
THOMAS ABRAHAM and PHILIP JOHN,
HOLDERS OF MORE THAN TWENTY PERCENT
OF ALL OUTSTANDING SHARES OF ELITE
TECHNOLOGY NY, INC.,

Petitioners,

-against-

HANHUI LU and YONG HONG FAN

Respondents,

FOR THE DISSOLUTION OF ELITE
TECHNOLOGY NY, INC.

ORDER TO SHOW CAUSE AND VERIFIED PETITION

BAUMAN KATZ & GRILL LLP
Attorneys for Petitioner Thomas Abraham
28 West 44th Street, Suite 900
New York, New York 10036

-and-

ALLEGAERT BERGER & VOGEL LLP
Attorneys for Petitioner Philip John
111 Broadway, 18th Floor
New York, New York 10006

To

Attorney(s) for

Service of a copy of the within

is hereby admitted

Dated,

Attorney(s) for

NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named Court on 20

NOTICE OF SETTLEMENT

that an order
of which the within is a true copy will be presented for settlement to the HON.
one of the judges of the within named Court, at
on the day of 20 at M.

Dated,

Yours, etc.,

BAUMAN KATZ & GRILL LLP
Attorneys for Petitioner Thomas Abraham
28 West 44th Street, Suite 900
New York, New York 10036

A. The Necessity For Dissolution

2. Petitioners are compelled to bring this proceeding as a result of the wrongful acts of the shareholders owning fifty-one (51%) percent of the common shares of Elite, the Respondents herein, Hanhui Lu (“Henry”) and Yong Hong Fan (“Jane”) (collectively, the “Respondents”). As set forth in detail below, Respondents have engaged in and continue to engage in, a systematic course of wrongful conduct culminating in their recently having assumed unilateral control of the Corporation, thereby “freezing out” Abe and I from participation in corporate actions and decisions. Respondents have also caused and continue to cause substantial waste and depletion of corporate assets and property. Abe and I believe that, should Respondents’ wrongful conduct continue, Elite’s assets will be lost and our interests in Elite will become worthless.

3. I am advised by counsel that under these dire circumstances, in the interest of protecting the Corporation and Petitioners’ interest therein, the Court should also appoint a Receiver so that Respondents cannot continue to waste, divert and dissipate the property and assets of Elite, and so that the assets of Elite will be lawfully preserved for distribution to Petitioners in connection with the rulings in the instant dissolution proceeding.

4. In addition, Petitioners seek a temporary restraining order pending the hearing and determination of this application, enjoining Respondents, and all persons interested in the Corporation from expending or disbursing any corporate funds, property or assets to or in favor of any shareholder, officer, director, employee or agent of the Corporation. This temporary relief is necessary because the Respondents, having complete control of Elite, may attempt to “tank” the Corporation when they learn of the pendency of this proceeding. I am also advised that the temporary restraining order is warranted in light

of the lengthy return date necessarily required in a judicial dissolution proceeding. Thus, between the time Petitioners' order to show cause is signed and the return date of the application, which may exceed thirty days, we respectfully seek an Order ensuring that the Respondents will not engage in further detrimental conduct towards the Corporation or Petitioners.

5. In the following paragraphs, I will set forth the facts and events which reveal Respondents' unlawful and oppressive conduct, warranting the dissolution of Elite.

B. The Relevant Facts

(i) Petitioners' Purchase of Interests in Elite

6. From April, 2000 through September 2002, I was employed as a salesman by Candle Business Systems which sold photocopiers and related products and services in the City of New York. Abe was a sales manager and my superior.

7. In September 2002, I left the employ of Candle Business Systems and joined Quantum Ventures, Inc. ("QVI"), a New York corporation, for the purpose of selling photocopiers and related products and services in the City of New York. Thereafter, Abe also left Candle Business Systems and joined me as a shareholder in QVI.

8. In the Spring of 2003, Elite became a client of QVI. Elite, which was owned, operated and managed by the individual Respondents, was an authorized distributor of Savin copiers, products and services. In particular, Henry had a strong technical background and expertise in the servicing of photocopiers; however, Elite lacked a strong sales department. Therefore, in about April of 2003, QVI agreed to act as a primary sales consultant on a commission basis to assist Elite in the marketing of its copiers and other products and services.

9. Not long after this relationship began, it became clear to Abe and me that we needed to become more involved in the management of Elite's general business operations in order to ensure its success. Therefore, on or about June 30, 2003, Henry, Jane, Elite, Abe and I entered into an agreement (the "Agreement"), a true and correct copy of which is attached hereto as Exhibit "A." Under the terms of the Agreement, we agreed to transfer all of the assets and operations of QVI into Elite in exchange for 49% of the voting common shares of Elite. We also agreed to convey and transfer to Elite all of our business and good will, customers, contract rights and all of our "expertise and knowhow in the industry." The four of us also agreed "to dedicate at least five years from the date of the [A]greement toward [our] respective roles as partners of the company."

(ii) The Parties' Respective Roles in Elite

10. Thus, at the time the Agreement was made, all of the parties had certain understandings and reasonable expectations, express and/or implicit, regarding our roles as shareholders of the Corporation. Our expectations generally included the following:

- a. That each of the four shareholders would constitute the Board of Directors and jointly manage the Corporation in the same manner as if we were true partners;
- b. That each of the shareholders would have continuous employment with Elite, absent extraordinary circumstances;
- c. That Henry would manage Elite's service department and have primary authority and control over its operations;
- d. That Jane would manage the financial accounting and bookkeeping for Elite;

- e. That Abe and I would manage Elite's sales operations and have primary authority and control over its operations; and
- f. That within each of our respective spheres of control and responsibility, we would have ultimate authority for the hiring, firing and management of all personnel within that sphere of Elite's operations.

(iii) Elite's Extraordinary Growth

11. Our agreement to join Elite and devote ourselves to growing its sales was remarkably successful. In 2002, Elite had total sales of approximately \$1.4 million. Although we joined Elite in mid-year, Elite's sales in 2003 were approximately \$2.4 million. In 2004, sales increased to approximately \$6.9 million and, in 2005, Elite's sales had increased to approximately \$8.4 million for the year. As a result, Elite opened three new offices between the beginning of 2004 and the middle of 2005.

12. From July, 2003 until approximately the end of 2005, consistent with our above-described expectations and understanding of the parties, Henry, Jane, Abe and I would meet regularly to make various decisions concerning Elite's business operations. At such meetings, which usually occurred monthly, various decisions would be made, almost always by a consensus and not by means of a formal vote. These decisions would include whether to open a new office, whether to hire or discharge key management level personnel and other similar management decisions. These meetings were held informally, without formal notice, keeping of minutes or the adoption of resolutions.

(iv) The Parties' Buyout Negotiations and Respondents' Improper Usurpation of Corporate Control

13. In about January, 2006, Henry and Jane verbally informed Abe and me

that they did not feel that they could work together with us any longer and that they wanted to sell their interest in Elite either to Abe and me or to a third party. Henry and Jane told us that they wanted to be paid \$4 million for their 51% interest in the Company.

14. From that point, Abe and I began to seek financing for the purchase of Henry and Jane's shares for the \$4 million requested, a fact that we communicated to Henry and Jane. However, and notwithstanding that Abe and I were seeking financing so that we would be able to buy-out Henry and Jane at the price they sought, Henry and Jane suddenly and inexplicably took over control of all of Elite's operations, including the sales department, which Abe and I were supposed to manage. The management meetings between the four of us, which we had been having regularly for the preceding two and a half years, ceased and Abe and I were generally no longer consulted or informed about business decisions in the Corporation.

15. On April 24, 2006, I sent an email to Henry confirming the history of Abe and my negotiations to "buy out" the interests of Henry and Jane, a copy of which is attached hereto as Exhibit "B." However, Henry responded verbally by telling me that he and Jane had no intention of selling their shares.

16. Since taking over complete control of Elite, Henry and Jane have made various unilateral decisions regarding management and operations of the sales department of Elite without input from, or consultation with, Abe and/or me, including the following:

a. In March, 2006, Henry informed Abe and me that he intended to hire Nancy Sue as a sales manager in Elite's Westchester office. Abe and I indicated that we would at least like to meet with her before he hired her, but he hired her anyway without our involvement or consent.

b. In March, 2006, Henry refused to discharge Joe Sudano as the Vice-President of Sales, despite our recommendation that he be discharged.

c. In March, 2006, over my objections, Henry effectively discharged my assistant, Teena Kaur, for no good reason.

d. About two and a half months ago, Henry hired Salvatore Pavano as a sales manager in the Long Island office without our involvement or consent.

e. About two months ago, Henry unilaterally fired James Brock, a sales manager in Elite's Nassau County office, over our objection and without our consent.

f. In the last few months, Henry has unilaterally hired several salesmen without our involvement or consent.

17. On or about May 10, 2006, Henry and Jane called a special meeting of shareholders for May 22, 2006. Although Elite had never adopted any bylaws, the specified purpose was to remove the existing board of directors and elect new board members.

18. On or about May 22, 2006, over the specific written objection of Abe and me, a copy of which is attached hereto as Exhibit "C," Henry and Jane voted to remove me from the Board of Directors.

19. On July 13, 2006, Henry and Jane made a formal, written proposal to purchase our shares for \$1.5 million in cash or \$2 million to be paid over time without interest. A true and correct copy of this proposal is attached hereto as Exhibit "D." As a condition to such purchase offer, Henry and Jane insisted that Abe and I agree to a long-term non-competition covenant.

20. Within a couple of days thereafter, Abe and I were informed we would no

longer be paid for our services as employees of Elite and that we would no longer be employed by Elite after the end of July, 2006.

21. On July 17, 2006, Abe and I discovered that our company's credit cards had been cancelled without notice or provocation.

22. On July 18, 2006, I sent an email to Henry confirming the statements that had been made concerning our impending discharge, a copy of which is annexed hereto as Exhibit "E." Later that date, Abe and I each received by email formal notification that our employment with Elite was terminated effective immediately without cause. A copy of the email I received from Henry is attached hereto as Exhibit "F."

C. Respondents' Reckless and Improper Conduct Has Resulted in Substantial and Lasting Harm to Elite and Petitioners' Interests Therein

23. Respondents' reckless and wrongful conduct has injured and continues to injure the Corporation and Petitioners.

24. Since Henry and Jane have frozen Petitioners out and improperly taken complete control of the management and operation of Elite, the business has suffered greatly. Although in the preceding two and a half years, Abe and I were able to grow Elite's revenues by a phenomenal 450%; i.e., from \$1.4 million in 2002 to approximately \$8.4 million in 2005, revenues for 2006 declined dramatically. Upon information and belief, the sales in 2006 are approximately half of the preceding year for the same time period.

25. Moreover, several key employees have left or have indicated their intention to leave Elite unless something is done to remove Henry and Jane from complete control of Elite's business operations and improve the condition of the Corporation.

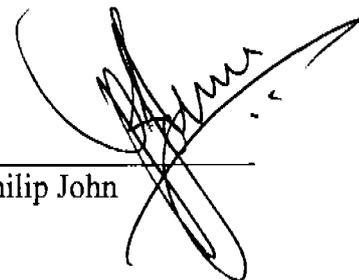
26. By their unlawful actions, which have financially harmed the

Corporation, the Respondents have also diminished the value of Petitioners' interest in Elite. Accordingly, we respectfully request that this Court put an end to Respondents' reckless conduct before the Corporation loses all of its assets and is reduced to a shell.

27. There has been no prior application for the relief sought herein.

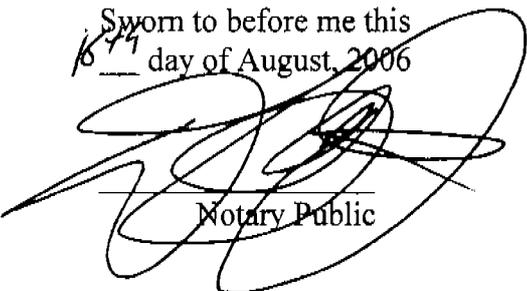
D. Conclusion

WHEREFORE, it is respectfully requested that an Order be granted: a) dissolving Elite Technology NY, Inc. in accordance with §1104-1 of the Business Corporation Law; b) appointing a receiver for Elite pursuant to the Provisions of §1202 of the Business Corporation Law; c) pending a hearing and determination of this application, enjoining and restraining Respondents Hanhui Lu and Yong Hong Fan, and all persons interested in the Corporation from expending or disbursing any corporate funds, property or assets to or in favor of any shareholder, officer, director, employee or agent of the Corporation or in favor of or to any attorney at law; and d) for such other and further relief as this Court deems just, proper and equitable including, but not limited to, Petitioners' reasonable attorneys' fees and the costs and disbursements of this proceeding.



Philip John

Sworn to before me this
16th day of August, 2006



Notary Public

DAVID M GRILL
Notary Public, State of New York
No. 02GR5017800
Qualified in Suffolk County
Commission Expires November 1, 2009

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COUNTY OF NEW YORK

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-against-

HANHUI LU and YONG HONG FAN

Respondents,

FOR THE DISSOLUTION OF ELITE
TECHNOLOGY NY, INC.

PHILIP JOHN AFFIDAVIT

BAUMAN KATZ & GRILL LLP
Attorneys for Petitioner Thomas Abraham
28 West 44th Street, Suite 900
New York, New York 10036

-and-

ALLEGAERT BERGER & VOGEL LLP
Attorneys for Petitioner Philip John
111 Broadway, 18th Floor
New York, New York 10006

To

Attorney(s) for

Service of a copy of the within

is hereby admitted

Dated,

Attorney(s) for

NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named Court on 20

NOTICE OF SETTLEMENT

that an order
of which the within is a true copy will be presented for settlement to the HON.
one of the judges of the within named Court, at
on the day of 20 at M.

Dated,

Yours, etc.,

BAUMAN KATZ & GRILL LLP
Attorneys for Petitioner Thomas Abraham
28 West 44th Street, Suite 900
New York, New York 10036