UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ADRIAN SCHOOLCRAFT,	 10-CV-6005 (RWS)
-against-	

THE CITY OF NEW YORK, et al.

NOTICE OF MOTION

Defendants -----X

**PLEASE TAKE NOTICE** that, upon the annexed Declaration of Senior Counsel Alan Scheiner, Esq., dated September 21, 2015, and the exhibits annexed thereto; the accompanying Memorandum of Law; and upon all prior pleadings and proceedings had herein, Defendants City of New York, Deputy Chief Michael Marino, Gerald Nelson, Theodore Lauterborn, William Gough, Frederick Sawyer, Kurt Duncan, Christopher Broschart, Shantel James, and FDNY Lieutenant Elise Hanlon (collectively the "City defendants") will move this Court, before the Honorable Robert W. Sweet, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard after October 9, 2015, for an Order precluding plaintiff from introducing certain evidence at trial, as specified in the accompanying Memorandum of Law dated September 21, 2015, and for such other and further relief as the Court may deem just and proper;

## PLEASE TAKE FURTHER NOTICE that opposition papers, if any, must be served on

the undersigned on or before October 9, 2015, pursuant to the Court's prior order.

Dated: New York, New York September 21, 2015

Respectfully submitted,

ZACHARY W. CARTER Corporation Counsel of the City of New York *Attorneys for City defendants* 100 Church Street, Room 3-174 New York, New York 10007 (212) 356-2344 ascheiner@law.nyc.gov

By:

Alan Scheiner Senior Counsel Cheryl Shammas Senior Counsel Kavin Thadani Senior Counsel

/s/

cc: Nathaniel Smith (By ECF) Attorney for Plaintiff

> Jon Norinsberg (By ECF) Attorney for Plaintiff

Gerald Cohen (By ECF) Cohen & Fitch LLLP *Attorneys for Plaintiff* 

Gregory John Radomisli (By ECF) MARTIN CLEARWATER & BELL LLP Attorneys for Jamaica Hospital Medical Center

Brian Lee (By ECF) IVONE, DEVINE & JENSEN, LLP Attorneys for Dr. Isak Isakov

Paul Callan (By ECF) CALLAN, KOSTER, BRADY & BRENNAN, LLP Attorneys for Lillian Aldana-Bernier

Walter Kretz (By ECF) SCOPPETTA SEIFF KRETZ & ABERCROMBIE Attorney for Defendant Mauriello Docket No 10-CV-6005 (RWS)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

THE CITY OF NEW YORK, et al.,

Defendants.

## NOTICE OF MOTION OF CITY DEFENDANTS' MOTION IN LIMINE

## ZACHARY W. CARTER

Corporation Counsel of the City of New York Attorney for City Defendants 100 Church Street, Room 3-174 New York, New York 10007

> *Of Counsel: Alan H. Scheiner Tel: (212) 356-2344 James Horton Tel: (212) 356-2647*

Due and timely service is hereby admitted.

New York, N.Y....., 2014