

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

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JOSEPH RAKOFSKY and RAKOFSKY LAW
FIRM, P.C.,

Plaintiffs,

-against-

THE WASHINGTON POST COMPANY, et al.,

Defendants.
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Notice of Motion for Sanctions
Under CPLR § 8303-a and 22
NYCRR 130-1.1

Index # 105573/11

PLEASE TAKE NOTICE THAT, upon the memorandum of law accompanying this notice, the exhibits annexed thereto, the Affidavit of Eric Turkewitz, and all prior pleadings, motions, filings and proceedings in this matter, the defendants identified herein, represented by Randazza Legal Group and the Turkewitz Law Firm, will move this Court at Room 130, at the Courthouse at 60 Centre Street, New York, New York 10007 on January 17, 2012 at 9:30 a.m. or as soon thereafter as counsel may be heard, for an order awarding to the defendants their costs and reasonable attorneys' fees against plaintiffs Joseph Rakofsky, Rakofsky Law Firm P.C., and their counsel, Matthew H. Goldsmith, under CPLR § 8303-a and 22 NYCRR § 130-1.1, in addition to such other, different and further relief as this court deems just and proper.

Under CPLR § 2214(b), Plaintiffs' response to this motion, if any, must be served upon defendants' undersigned counsel at least seven (7) days prior to the return date of this motion.

Respectfully submitted by counsel for Defendants (1) Eric Turkewitz, (2) The Turkewitz Law Firm, (3) Scott Greenfield, (4) Simple Justice NY, LLC, (5) blog.simplejustice.us, (6) Kravet & Vogel, LLP, (7) Carolyn Elefant, (8) MyShingle.com, (9) Mark Bennett, (10) Bennett And Bennett, (11) Eric L. Mayer, (12) Eric L. Mayer, Attorney-at-Law, (13) Nathaniel Burney, (14) The Burney Law Firm, LLC, (15) Josh King, (16) Avvo, Inc., (17) Jeff Gamso, (18) George M. Wallace, (19) Wallace, Brown & Schwartz, (20) “Tarrant84”, (21) Banned Ventures LLC, (22) BanniNation, (23) Brian L. Tannebaum, (24) Tannebaum Weiss, (25) Colin Samuels, (26) Accela, Inc., (27) Crime and Federalism, (28) John Doe # 1, (29) Antonin I. Pribetic, (30) Steinberg Morton, (31) David C. Wells, (32) David C. Wells P.C., (33) Elie Mystal, (34) AboveTheLaw.com, and (35) Breaking Media, LLC.

On this 2nd day of January, 2013

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