

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

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SANDRA PEREZ,

Plaintiff,

**MOTION FOR DEFAULT
JUDGMENT**

-against-

Index No.: 150891/14

19 KENMARE REALTY LLC, LITTLE
CHARLIE'S OYSTER BAR, INC. and
CITI-URBAN MANAGEMENT CORP.,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed affirmation of Raphael Rybak, duly affirmed on May 1, 2014, together with the exhibits annexed thereto, and upon all the pleadings and proceedings heretofore had herein, the undersigned will move this Court at an IAS Motion Support Part thereof, at the New York County courthouse located at New York County Supreme Court, 60 Centre Street, New York, NY 10007-1474, on June 3, 2014, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to CPLR §3215(a)(b), directing that a Default Judgment be entered against Defendants 19 KENMARE REALTY LLC, LITTLE CHARLIE'S OYSTER BAR, INC. and CITI-URBAN MANAGEMENT CORP., or in the alternative, setting this matter down for an inquest in favor of the Plaintiff, assessing damages in a sum certain or for a sum which can, by computation, be made certain, awarding costs, attorneys' fees and sanctions to Plaintiff's attorneys, and for such other and further relief which to this Court seems just and proper.

PLEASE TAKE FURTHER NOTICE, that answering affidavits, if any, are to be served upon the undersigned within seven (7) days prior to the return date of the within application.

Dated: New York, New York
May 1, 2014

Yours, etc.,



RAPHAEL RYBAK
DAVID HOROWITZ, P.C.

Attorneys for Plaintiff
SANDRA PEREZ
276 Fifth Avenue, Suite 306
New York, New York 10001
(212) 684-3630
Our File No. 2087

TO: 19 KENMARE REALTY LLC
Defendant Pro-Se (Default)
19 Kenmare Street
New York, New York 10012

LITTLE CHARLIE'S OYSTER BAR, INC.
Defendant Pro-Se (Default)
19 Kenmare Street
New York, New York 10012

CITI-URBAN MANAGEMENT CORP.
Defendant Pro-Se (Default)
6 Grace Avenue
Great Neck, New York 11201
and/or
U.S. Adjustment Corp.
Seven Neshaminy Interplex
Suite 115
U.S. Route 1 & Old Lincoln Highway
Trevose, PA 19053