

ZEITLIN & ZEITLIN, P.C.
50 COURT STREET, SUITE 506
BROOKLYN, NEW YORK 11201
(718) 596-6815
Attorneys *pro hac vice* for Defendant, William Lee Childs, Jr.

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	:	
LYNNE MITCHNICK,	:	SUPERIOR COURT OF NEW
	:	JERSEY
	:	LAW DIVISION
Plaintiff,	:	HUDSON COUNTY
	:	
-against-	:	
	:	Docket No. HUD-L-4742-12
WILLIAM LEE CHILDS, JR.	:	
	:	Civil Action
Defendant.	:	
	:	NOTICE OF MOTION TO
	:	RECONSIDER
-----	X	

To: Eric Szoke, Esq.
Steven Robert Lehr, P.C.
33 Clinton Road, Suite 100
West Caldwell, New Jersey 07006

PLEASE TAKE NOTICE that on February 28, 2014 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned will move the Honorable Francis B. Schultz, J.S.C, of the Superior Court of New Jersey, Law Division, Hudson County, Brennan Courthouse, 4th Floor, 583 Newark Avenue, Jersey City, New Jersey 07306, by way of motion, pursuant to R. 4:49-2, seeking reconsideration of the Court's December 4, 2013 Order granting the plaintiff summary judgment on defendant's affirmative defense of illegality.

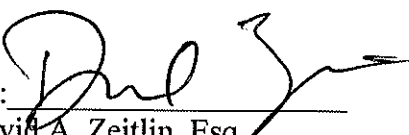
PLEASE TAKE FURTHER NOTICE that the undersigned will rely upon the annexed Certification of Counsel submitted herewith in support of this motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order has been submitted herewith.

PLEASE TAKE FURTHER NOTICE, that pursuant to R. 1:6-2, movant requests oral argument.

Dated: January 24, 2014

ZEITLIN & ZEITLIN, P.C.

By: 
David A. Zeitlin, Esq.
Attorneys *pro hac vice* for Defendnt

CERTIFICATION

The undersigned hereby certifies that the original and two copies of the within Notice of Motion and Certification of Counsel, have this day been filed with the Superior Court of New Jersey, Law Division, Hudson County, by hand.

The undersigned hereby further certifies that one copy of each of the within Notice of Motion and Certification of Counsel have this day been sent for service, via certified mail, upon the following:

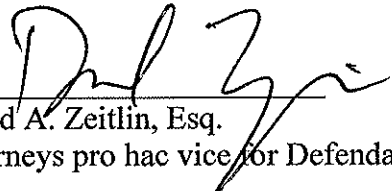
Eric J. Szoke, Esq.
Steven Robert Lehr, P.C.
33 Clinton Road, Suite 100
West Caldwell, New Jersey 07006
Attorneys for Plaintiff

Melvin R. Solomon, Esq.
Parkesian & Solomon, P.C.
140 Main Street
Hackensack, New Jersey 07601
Trial Attorney of Record for Defendant

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 24, 2014

ZEITLIN & ZEITLIN, P.C.

By: 
David A. Zeitlin, Esq.
Attorneys pro hac vice for Defendant