SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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RICHARD C. LITMAN,

Plaintiff,

-against-

JOSHUA B. GOLDBERG,

Defendant.

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INDEX NO. 524343/2025

Motion Sequence No.: 2

Honorable Aaron D. Maslow, J.S.C.

NOTICE OF MOTION TO DISMISS

TO: Richard C. Litman
172 Sterling Place, Apt. 8
Brooklyn, NY 11217
(703) 409-8850
rclitman@gmail.com
Pro Se Plaintiff

PLEASE TAKE NOTICE that on November 14, 2025, at 9:30 a.m., or as soon thereafter as counsel may be heard, Connell Foley LLP, attorneys for Defendant Joshua B. Goldberg, Esq. ("Goldberg") shall move before the Honorable Aaron D. Maslow of the Supreme Court of the State of New York, Kings County, IAS Part 2 located at Courtroom 15.58, 320 Jay Street Brooklyn, NY 11201 for an Order dismissing Plaintiff's Second Amended Complaint pursuant to CPLR §§ 3211(a)(5) and (7) with prejudice.

PLEASE TAKE FURTHER NOTICE that in support thereof, Goldberg shall rely upon the Affirmation of Goldberg with accompanying Exhibits, Affirmation of Aaron H. Gould, Esq. with accompanying Exhibits and Brief.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR § 2214(b), answering affidavits, if any, are required to be served on the undersigned no later than seven (7) days prior to the return date of this motion.

DATE: New York, New York
October 23, 2025

CONNELL FOLEY LLP
Attorneys for Defendant, Joshua B. Goldberg, Esq.

BY: /s/ Leo J. Hurley, Jr.

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Jared F. Hotchkiss, Esq.
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