INDEX NO. 161633/2023

NYSCEF DOC. NO. 33 RECEIVED NYSCEF: 05/28/2024

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

In the Matter of the Application of THE CITY and YOAV GONEN,

:

Petitioners,

-against- : Index No. 161633/2023

The NEW YORK CITY POLICE DEPARTMENT, and EDWARD A. CABAN, in his official capacity as Commissioner of the New York City Police Department

NOTICE OF MOTION TO COMPEL PRODUCTION OF RESPONSIVE RECORDS

Respondents.

For a Judgment Pursuant to Article 78

of the Civil Practice Law and Rules :

PLEASE TAKE NOTICE that upon the Affidavit of Gunita Singh dated May 28, 2024, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all pleadings and proceedings hereto and herein, Petitioners The CITY and Yoav Gonen ("Petitioners") will move before this Court in the Motion Submission Part, Room 130, at the Courthouse located at 60 Centre Street New York, New York, on June 5, 2024, at 9:30 a.m., or as soon thereafter as counsel can be heard for an requiring the production of respondive documents in response to Petitioners' FOIL requests, and granting such other and further relief as this Court deems appropriate.

Dated: May 28, 2024

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

/s/ John M. Browning
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4865-1299-6023v.2 0201471-000001

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