

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CHEMUNG

Index No.: **2023-5539**

-----X
CAPREECE MOORE,

Plaintiff(s),

NOTICE TO ADMIT

-against-

LESHA P. MASSOUP, DUKE HUR, J. B. HUNT
TRANSPORT, INC. and COSTCO WHOLESALE
CORPORATION,

Defendant(s).

-----X

PLEASE TAKE NOTICE that pursuant to Section 3123 of the CPLR, you are hereby requested to furnish to the undersigned, within twenty (20) days after the service of this notice, a written admission of the truth of the following matters of fact:

1. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, owned a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**.

2. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, was the title owner of a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**.

3. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, was the register owner of a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**.

4. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, owned a certain 2022 International LT625 truck, bearing a vehicle identification number, **3HSDZTZRXNN565422**.

5. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, was the title owner of a certain 2022 International LT625 truck, bearing a vehicle identification number, **3HSDZTZRXNN565422**.

6. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, was the register owner of a certain 2022 International LT625 truck, bearing a vehicle identification number, **3HSDZTZRXNN565422**.

7. That on November 12, 2021, and upon information and belief, the defendant, **COSTCO WHOLESALE CORPORATION**, was lessor of a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**.

8. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, was lessee of a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**.

9. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, owner of a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**.

10. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, was the title owner of a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**.

11. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, was the register owner of a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**.

12. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, was the lessor of a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**.

13. That on November 12, 2021, and upon information and belief, the defendant **COSTCO WHOLESALE CORPORATION**, was the lessee of a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**.

14. That on November 12, 2021, and upon information and belief, the defendant, **DUK HUR, i/s/h/ as DUKE HUR**, operated a certain 2022 International LT625 truck, bearing Indiana State registration number, **3058781**, with the knowledge, permission and consent of the defendant, **COSTCO WHOLESALE CORPORATION**.

15. That on November 12, 2021, and upon information and belief, the defendant, **DUK HUR, i/s/h/ as DUKE HUR**, operated a certain 2022 International LT625 truck, bearing a vehicle identification number, **3HSDZTZRXNN565422**, with the knowledge, permission and consent of the defendant, **COSTCO WHOLESALE CORPORATION**.

16. That on November 12, 2021, and upon information and belief, the defendant, **DUK HUR, i/s/h/ as DUKE HUR**, operated a certain 2018 Wabash National Trailer bearing New Jersey State registration number, **TSU65V**, with the knowledge, permission and consent of the defendant, **COSTCO WHOLESALE CORPORATION**.

17. That on November 12, 2021, and upon information and belief, the defendant, **DUKE HUR**, was an employee of the defendant, **COSTCO WHOLESALE CORPORATION**.

PLEASE TAKE NOTICE, that each of the matters of which an admission is requested shall be deemed admitted unless within twenty (20) days after service herein, (or within such further time as the court may allow), the party defendants serve upon the demanding party's attorney's office a **sworn statement** either denying specifically the matters of which an admission is requested

or setting forth in detail the reasons why he cannot truthfully either admit or deny those matters. If any matters of which an admission is requested cannot be fairly admitted without some material qualification or explanation, or if the matters constitute a trade secret or such party would be privileged or disqualified from testifying as a witness concerning them, such party may, in lieu of a denial or statement, serve a sworn statement setting forth in detail his claim and, if the claim is that the matters cannot be fairly admitted without some material qualification or explanation, admitting the matters with such qualification or explanation.

Dated: New York, New York
September 6, 2023

Yours, etc.

Jason L. Paris

JASON L. PARIS, ESQ.
THE PARIS LAW GROUP, P.C.
Attorneys for Plaintiff
CAPREECE MOORE
60 East 42nd Street, Suite 4000
New York, NY 10165
212-970-8754

TO:

WEBER GALLAGHER SIMPSON STAPLETON FIRES & NEWBY LLP
Attorneys for Defendants
DUKE HUR,
J. B. HUNT TRANSPORT, INC.
and COSTCO WHOLESALE CORPORATION
1500 Broadway, Suite 2401
New York, New York 10036
(929) 342-6000