

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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MORDECHAI ITZKOWITZ; REMMI, INC., individually and derivatively on behalf of REMMI SERVICES, LLC; YISROEL GRAFSTEIN; YCD, 1760, LLC; NATHAN UNGAR; BAMBA GAMBA, CORP.; MURRAY PUDERBEUTEL; POWDER BAG, LLC; ELI SEGEL; BALR ENTERPRISES, LLC; ALL BORO TRANSIT, LLC; ASHER FRIED; AFFW FLEET I, LLC; RSAAC FLEET, LLC; CHARLES KLEIN; CREAMSK FLEET, LLC; NLK FLEET, LLC; BSDGEE FLEET, LLC; GEEGEE FLEET, LLC; JEFFREY EDELMAN, individually and derivatively on behalf of RJ CAPITAL, LLC; MOSHE WEIL, individually and derivatively on behalf of TP GREEN, LLC; AMARPREET SINGH, individually and derivatively on behalf of SAHAILI PARTNERS, LLC; SHMUEL LAUFER individually and derivatively on behalf of SAM EXPRESS, LLC; MICHAEL GREENFIELD; PESSEL SHARON FELDHEIM, derivatively on behalf of PAN TRANSPORT, LLC; RIVKA HECHT, derivatively on behalf of RH GREEN, LLC; ISCHA HECHT a/k/a "YISHAI HECHT", individually and derivatively on behalf of GREENISH, LLC; ISCHA HECHT, derivatively on behalf of DADS GREEN, LLC; ISCHA HECHT, derivatively on behalf of NP GREEN, LLC; CHAIM NEGER, individually and derivatively on behalf of GREEN MEDALLION ONE, LLC; GORN, LLC; MM MMGT, LLC; SN S&N, LLC; SS N&S, LLC; YM 1875, LLC; SC BSD, LLC; MKGT, LLC; 17B, LLC; MUNIT, LLC; 50P, LLC; and 307P, LLC,

Case No: 509504/2016
Hon. Sylvia G. Ash

Plaintiffs,

**AMENDED
COMPLAINT**

-against-

ALAN J. GINSBURG a/k/a "A.J."; MEGA FUNDING, LLC; GREEN APPLE CABS, LLC a/k/a "GREEN APPLE CAB COMPANY"; GLS TRANS, INC.; YITZCHOK MATTIS SWERDLOFF a/k/a "MATT" a/k/a "RIVERDALE"; DALE & CRUE, LLC; RYDER PARTNERS, LLC; and JUDAH LANGER a/k/a "YEHUDA",

Defendants.

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Plaintiffs Mordechai Itzkowitz; Remmi, Inc., individually and derivatively on behalf of Remmi Services, LLC; Yisroel Grafstein; YCD, 1760, LLC; Nathan Ungar; Bamba Gamba, Corp.; Murray Puderbeutel; Powder Bag, LLC; Eli Segel; BALR Enterprises, LLC; All Boro Transit, LLC; Asher Fried; AFFW Fleet I, LLC; RSAAC Fleet, LLC; Charles Klein; Creask Fleet, LLC; NLK Fleet, LLC; BSDGEE Fleet, LLC; GEEGEE Fleet, LLC; Jeffrey Edelman, individually and derivatively on behalf of RJ Capital, LLC; Moshe Weil, individually, and derivatively on behalf of TP Green, LLC; Amarpreet Singh, individually and derivatively on behalf of Sahaili, LLC; Shmuel Laufer, individually and derivatively on behalf of Sam Express, LLC; Michael Greenfield; Pessel Sharon Feldheim, derivatively on behalf of Pan Transport, LLC; Rivka Hecht, derivatively on behalf of RH Green, LLC; Ischa Hecht a/k/a “Yishai”, individually, and derivatively on behalf of Greenish, LLC; Ischa Hecht, derivatively on behalf of Dads Green, LLC; Ischa Hecht, derivatively on behalf of NP Green, LLC; Chaim Neger, individually and derivatively on behalf of Green Medallion One, LLC;¹ by and through their undersigned counsel, Jacob Laufer P.C., Jacob Laufer, Esq., of counsel, hereby file this Amended Complaint against Defendants Alan J. Ginsburg a/k/a A.J. (“Ginsburg”), Mega Funding, LLC (“Mega Funding”), Dale & Crue, LLC (“Dale”), Green Apple Cabs, LLC a/k/a Green Apple Cab Company (“Green Apple”), GLS Trans, Inc. (“GLS Trans”), Yitzchok Mattis “Matt” Swerdloff (“Swerdloff”), Ryder Partners, LLC (“Ryder Partners”), and Judah Langer or Yehuda (“Langer”) and in support thereof, respectfully aver as follows:

¹ For convenience, Mordechai Itzkowitz, Jeffrey Edelman, Yisroel Grafstein, Michael Greenfield, Yishai Hecht, Nathan Ungar, Asher Fried, Charles Klein, Chaim Neger, Moshe Weil, Eli Segel, Murray Puderbeutel, Amarpreet Singh, and Shmuel Laufer are referred to as the “Individual Plaintiffs”; Pan Transport, LLC, Remmi Services, LLC, Greenish, LLC, Dads Green, LLC, NP Green, LLC, RH Green, LLC, Bamba Gamba, Corp., AFFW Fleet I, LLC, RSAAC Fleet, LLC, Creask Fleet, LLC, NLK Fleet, LLC, BSDGee, LLC, GeeGee Fleet, LLC, Green Medallion One, LLC, TP Green, LLC, YCD 1760, LLC, BALR Enterprises, LLC, RJ Capital, LLC, All Boro Transit, LLC,

1. Plaintiff Yisroel Grafstein (“Grafstein”) is a resident of the State of New York, County of Kings.
2. Plaintiff YCD 1760, LLC (“YCD 1760”) is a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.
3. Plaintiff Jeffrey Edelman (“Edelman”) is a resident of the State of New York, County of Kings.
4. Edelman is a majority in interest member of Plaintiff RJ Capital, LLC (“RJ Capital”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.
5. Edelman brings this action individually and derivatively on behalf of RJ Capital. Demand has not been made of other members of RJ Capital because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.
6. Plaintiff Mordechai Itzkowitz (“Itzkowitz”) is a resident of Baltimore, Maryland.
7. Plaintiff Remmi, Inc. is a corporation duly organized and existing under the laws of the State of Maryland, with its principal place of business in Maryland.
8. Plaintiff Remmi, Inc. is a majority in interest member of Plaintiff Remmi Services, LLC (“Remmi Services”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.
9. Remmi, Inc. brings this action individually and derivatively on behalf of Remmi Services. Demand has not been made of other members of Remmi Services because they are

Powder Bag, LLC, Sam Express, LLC, and Sahaili Partners, LLC are referred to as the “Company Plaintiffs.”

directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

10. Plaintiff Michael Greenfield is a resident of the State of New York, County of Rockland.

11. Plaintiff Pessel Sharon Feldheim (“Feldheim”) is a resident of the State of New York, County of Rockland.

12. Feldheim is a majority in interest member of Plaintiff Pan Transport, LLC (“Pan Transport”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

13. Feldheim brings this action individually and derivatively on behalf of Pan Transport. Demand has not been made of other members of Pan Transport because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

14. Plaintiff Rivka Hecht (“R.Hecht”) is a resident of the State of New York, County of Rockland.

15. R.Hecht is a majority in interest member of Plaintiff RH Green, LLC (“RH Green”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

16. R.Hecht brings this action derivatively on behalf of RH Green. Demand has not been made of other members of RH Green because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

17. Plaintiff Ischa Hecht a/k/a “Yishai” (“Hecht”) is a resident of the State of New York, County of Rockland.

18. Hecht is a majority in interest member of Plaintiff Greenish, LLC (“Greenish”), a limited

liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

19. Hecht brings this action derivatively on behalf of Greenish. Demand has not been made of other members of Greenish because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

20. Hecht is also a majority in interest member of Plaintiff Dads Green, LLC (“Dads Green”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

21. Hecht also brings this action derivatively on behalf of Dads Green. Demand has not been made of other members of Dads Green because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

22. Hecht is also a majority in interest member of Plaintiff NP Green, LLC (“NP Green”), a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

23. Hecht brings this action derivatively on behalf of NP Green. Demand has not been made of other members of NP Green because they are directly complicit in the allegations of wrongful conduct herein, and thus demand would be futile.

24. Plaintiff Nathan Ungar (“Ungar”) is a resident of the State of New York, County of Rockland.

25. Plaintiff Bamba Gamba Corp. (“Bamba Gamba”) is a corporation duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

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