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INDEX NO. 509504/2016

NYSCEF DOC. NO. 88

COURT OF THE STATE OF NEW YORK COUNTY OF KINGS

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; SHMUEL

LAUFER; PAN TRANSPORT, LLC; REMMI

SERVICES, LLC; GREENISH, LLC; DADS GREEN,

LLC; NP GREEN, LLC; RH GREEN, LLC;

BAMBAH GAMBA CORP; AFFW FLEET I, LLC;

RSAAC FLEET, LLC; CREASK FLEET, LLC; NLK

FLEET, LLC; BSDGEE FLEET, LLC; GEEGEE

FLEET, LLC; GREEN MEDALLION ONE, LLC;

YCD, 1760, LLC; TP GREEN, LLC; GORN, LLC; MM MMGT, LLC; SN S&N, LLC; SS N&S, LLC; YM

1875, LLC; SC BSD, LLC; BALR ENTERPRISES,

LLC; MKGT, LLC; 17B, LLC; MUNIT, LLC; RJ

CAPITAL, LLC; ALL BORO TRANSIT; POWDER

BAG, LLC; SAM EXPRESS, LLC; 50P, LLC; 307P,

LLC; SAHAILI PARTNERS, LLC,

Date Filed: Docket No.:

SUMMONS

Plaintiffs Demand a Trial By Jury

Plaintiffs,

-against-

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

Plaintiffs Designate Kings County as the Venue of Trial Based upon Plaintiffs' Residences in Kings County & CPLR §§ 301, 302(a)(2).

Defendants.

To: Defendants Alan J. "A.J." Ginsburg,

Mega Funding, LLC,

Dale & Crue, LLC,

Green Apple Cab Company, a/k/a Green Apple Cabs, LLC,

GLS Transit, Inc.,

Yitzchok Mattis "Matt" Swerdloff a/k/a "Riverdale",

Ryder Partners, LLC, and

Judah Langer:



YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance, on Plaintiffs' Attorneys within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York June 6, 2016

JACOB LAUFER P.C.

/s/ Jacob Laufer
Jacob Laufer, Esq.
65 Broadway, 10th Floor
New York, New York 10006
(212) 422-8500

Attorneys for Plaintiffs

To:

Clerk of the Court



COURT OF THE STATE OF NEW YORK COUNTY OF KINGS

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; SHMUEL LAUFER; PAN TRANSPORT, LLC; REMMI SERVICES, LLC; GREENISH, LLC; DADS GREEN, LLC; NP GREEN, LLC; RH GREEN, LLC; BAMBAH GAMBA CORP; AFFW FLEET I, LLC; RSAAC FLEET, LLC; CREASK FLEET, LLC; NLK FLEET, LLC; BSDGEE FLEET, LLC; GEEGEE FLEET, LLC; GREEN MEDALLION ONE, LLC; YCD, 1760, LLC; TP GREEN, LLC; GORN, LLC; MM MMGT, LLC; SN S&N, LLC; SS N&S, LLC; YM 1875, LLC; SC BSD, LLC; BALR ENTERPRISES, LLC; MKGT, LLC; 17B, LLC; MUNIT, LLC; RJ CAPITAL, LLC; ALL BORO TRANSIT; POWDER BAG, LLC; SAM EXPRESS, LLC; 50P, LLC; 307P,

Plaintiffs,

Dafamilanta

Docket No.

-against-

LLC; SAHAILI PARTNERS, LLC,

COMPLAINT

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

Defendants.	
 	X

Plaintiffs, by and through their undersigned counsel, Jacob Laufer P.C., Jacob Laufer, Esq., of counsel, hereby file this Complaint against Defendants Alan J. "A.J." Ginsburg ("Ginsburg"), Mega Funding, LLC ("Mega Funding"), Dale & Crue, LLC ("Dale"), Green



Apple Cab Company, a/k/a Green Apple Cabs, LLC ("Green Apple"), GLS Transit, Inc. ("GLS"), Yitzchok Mattis "Matt" Swerdloff ("Riverdale"), Ryder Partners, LLC ("Ryder Partners"), and Judah Langer ("Langer") and in support thereof, respectfully avers as follows:

- 1. Plaintiff Yisroel Grafstein is a resident of the State of New York, County of Kings.
- 2. Plaintiff Jeffrey Edelman is a resident of the State of New York, County of Kings.
- 3. Plaintiff Mordechai Itzkowitz is a resident of Baltimore, Maryland.
- 4. Plaintiff Michael Greenfield is a resident of the State of New York, County of Rockland.
- 5. Plaintiff Yishai Hecht is a resident of the State of New York, County of Rockland.
- 6. Plaintiff Nathan Ungar is a resident of the State of New York, County of Rockland.
- 7. Plaintiff Asher Fried is a resident of the State of New York, County of Kings.
- 8. Plaintiff Charles Klein is a resident of the State of New York, County of Kings.
- 9. Plaintiff Chaim Neger is a resident of Lakewood, New Jersey.
- 10. Plaintiff Moshe Weil is a resident of the State of New York, County of Kings.
- 11. Plaintiff Eli Segel is a resident of the State of New York, County of Kings.
- 12. Plaintiff Murray Puderbeutel is a resident of the State of New York, County of Kings.
- 13. Plaintiff Amarpreet Singh is a resident of the State of New York, County of Kings.
- 14. Plaintiff Shmuel Laufer is a resident of the State of New York, County of Kings.
- 15. Plaintiff Pan Transport, LLC 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.
- 16. Plaintiff Remmi Services, LLC 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.
- 17. Plaintiff Greenish, LLC 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.

- 18. Plaintiff Dads Green, LLC 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.
- 19. Plaintiff NP Green, LLC 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.
- 20. Plaintiff RH Green, LLC 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.
- 21. Plaintiff Bambah Gamba Corp. is a company duly organized and existing under the laws of the State of New York, with its principal place of business in New York.
- 22. Plaintiff AFFW Fleet I, LLC 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.
- 23. Plaintiff RSAAC Fleet, LLC 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.
- 24. Plaintiff Creask Fleet, LLC 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.
- 25. Plaintiff NLK Fleet, LLC 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.
- 26. Plaintiff BSDGee Fleet, LLC 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.
- 27. Plaintiff GeeGee Fleet, LLC 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.
- 28. Plaintiff Green Medallion One, LLC is a limited liability company duly organized and



DOCKET

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