

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X  
THE CITY OF NEW YORK,

Index No. 451031/2018

Plaintiff,

Mot. Seq. No. 001

-against-

BIG APPLE MANAGEMENT, LLC,  
321-3 WEST 47<sup>TH</sup> STREET ASSOCIATES, L.P.,  
THE LAND AND BUILDING KNOWN AS 321 WEST  
47<sup>TH</sup> STREET, BLOCK 1038, LOT 21, County, City and  
State of New York,  
THE LAND AND BUILDING KNOWN AS 323 WEST  
47<sup>TH</sup> STREET, BLOCK 1038, LOT 20, County, City and  
State of New York,  
328-30 WEST 47<sup>TH</sup> STREET ASSOCIATES, L.P.,  
THE LAND AND BUILDING KNOWN AS 328 WEST  
47<sup>TH</sup> STREET, BLOCK 1037, LOT 49, County, City and  
State of New York,  
332-4 WEST 47<sup>TH</sup> STREET ASSOCIATES, L.P.,  
THE LAND AND BUILDING KNOWN AS 332 WEST  
47<sup>TH</sup> STREET, BLOCK 1037, LOT 51, County, City and  
State of New York,  
THE LAND AND BUILDING KNOWN AS 334 WEST  
47<sup>TH</sup> STREET, BLOCK 1037, LOT 52, County, City and  
State of New York,  
348-58 WEST 47<sup>TH</sup> STREET ASSOCIATES, L.P.,  
THE LAND AND BUILDING KNOWN AS 348 WEST  
47<sup>TH</sup> STREET, BLOCK 1037, LOT 59, County, City and  
State of New York,  
THE LAND AND BUILDING KNOWN AS 350 WEST  
47<sup>TH</sup> STREET, BLOCK 1037, LOT 59, County, City and  
State of New York,  
FLAVIO RAUSEI, and  
“JOHN DOE” and “JANE DOE,” numbers 1 through 10,  
fictitiously named parties, true names unknown, the parties  
intended being the managers or operators of the business  
being carried on by defendant BIG APPLE  
MANAGEMENT, LLC, and any person claiming any right,  
title or interest in the real property which is the subject of  
this action,

Defendants.  
-----X

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF THE CITY OF  
NEW YORK'S MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

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