

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

DANIELLE EPSTEIN, JASON GOODMAN,  
And WARD GUILDAY,

*Petitioners,*

Index No. 657399/2020

-against-

SECAUCUS INVESTORS, LLC,

*Respondent.*

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**MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR PROVISIONAL  
REMEDY OR ATTACHMENT IN AID OF ARBITRATION**

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Petitioners Danielle Epstein, Jason Goodman, and Ward Guilday (collectively, “Petitioners”), by their attorneys, respectfully submit this Memorandum of Law in support of their application for an *ex parte* temporary restraining order and, pursuant to [CPLR § 7502\(c\)](#), either an injunction or, in the alternative, attachment in aid of arbitration against Secaucus Investors, LLC (“Secaucus”).

### **PRELIMINARY STATEMENT**

Secaucus is stealing from Petitioners. Petitioners participated in a loan, then in the amount of \$10 million, to non-party United States Division of the International Foundation a/k/a Foundation Harmony (“Harmony International”) and Harmony Foundation of New Jersey, Inc. (“Harmony Foundation” and, with Harmony International, “Harmony”). Petitioners’ contribution to that \$10 million loan is \$1.25 million. Harmony made partial repayments under the loan of approximately \$2.6 million, but Secaucus has not paid Petitioners a cent of those repayments to which they are contractually entitled. Secaucus, in fact, hid those repayments from Petitioners and now, in an arbitration that does not involve Petitioners, falsely claims that it was unaware and did not authorize Petitioners’ investment. Secaucus’ claim directly contradicts its own writings and actions.

Fortunately, Petitioners discovered Secaucus’ misconduct before it is too late. Petitioners will initiate an arbitration against Secaucus as soon as possible to enforce their rights. Now, they ask this Court to maintain the status quo to avoid any further theft and prevent an ineffectual arbitration award.

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