

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ORLEANS

---

AB 511 DOE

Plaintiff,

vs.

LYNDONVILLE CENTRAL SCHOOL  
DISTRICT; LYNDONVILLE ELEMENTARY  
SCHOOL,

Defendants.

---

**NOTICE OF CROSS-MOTION**

Index No.: 20-46602

Hon. Deborah A. Chimes, J.S.C.

PLEASE TAKE NOTICE:

MOTION MADE BY:

Leah Costanzo, Esq., Steve Boyd, P.C.,  
Attorneys for plaintiff

DATE, TIME AND PLACE:

Returnable on the 28<sup>th</sup> day of August, 2023  
at 9:30 a.m. before the Hon. Deborah A.  
Chimes.

SUPPORTING PAPERS:

Affirmation in support of cross-motion by  
Leah Costanzo, Esq., with attached exhibits,  
Response to Defendants' Statement of  
Material Facts and Memorandum of Law

GROUND FOR RELIEF SOUGHT:

CPLR § 3212

NATURE OF ACTION:

Child Victim's Act

PLEASE TAKE FURTHER NOTICE, answering affidavits are to be served pursuant to  
CPLR §2214(b).

DATED: Buffalo, New York  
August 17, 2023

/s/ Leah Costanzo  
Leah Costanzo, Esq.  
Steve Boyd, P.C.  
Attorney for Plaintiff  
2969 Main Street, Suite 100  
Buffalo, NY 14214  
(716) 400-0000

To: Meghan M. Hayes, Esq.  
Michael P. McClaren, Esq.  
Shannon B. O'Neill, Esq.  
Webster Szanyi, LLP  
Attorneys for Defendants  
424 Main Street, Suite 1400  
Buffalo, NY 14202  
(716) 842-2800