

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ORLEANS

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AB 511 DOE,

Plaintiff,

**NOTICE OF MOTION**

v.

Index No.: 20-46602

LYNDONVILLE CENTRAL SCHOOL  
DISTRICT AND LYNDONVILLE  
ELEMENTARY SCHOOL,

Defendants.

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PLEASE TAKE NOTICE:

MOTION MADE BY:

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

DATE, TIME AND PLACE:

Returnable on the \_\_\_\_ of \_\_\_\_\_, 2022  
at \_\_\_\_\_.m. at before the Hon. Deborah A.  
Chimes, J.S.C.

SUPPORTING PAPERS:

Affirmation in support of motion by Leah  
Costanzo, Esq. with attached exhibits.

RELIEF REQUESTED:

Compelling discovery, amending the  
scheduling order, adjourning the date of trial,  
and issuing a judicial subpoena for the  
complete records of the Orleans County  
Sheriff's Department surrounding its  
investigation of Terry Houseman in  
approximately 1990-1991.

GROUND FOR RELIEF SOUGHT:

CPLR §§3124 and 3126 to compel, CPLR  
§2307 for issuance of a judicial subpoena

NATURE OF ACTION:

Personal injury action.

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR §2214(b), answering  
affidavits, if any, must be served at least two (2) days before the return date of this motion.

DATED: August 2, 2022

/s/Leah Costanzo

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

TO: Shannon O'Neill, Esq.  
Webster Szanyi, LLP  
*Attorneys for Defendants*  
1400 Liberty Building  
Buffalo, New York 14202  
(716) 843-2800