FILED: ULSTER COUNTY CLERK 04/26/2023 04:42 PM

NYSCEF DOC. NO. 120

INDEX NO. EF2020-1189

RECEIVED NYSCEF: 04/26/2023

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF ULSTER

Index No. EF2020-1189

JOHN DOE I and JOHN DOE II,

Plaintiffs,

-against-

WILLIAM J. DEDERICK and KINGSTON CITY SCHOOL DISTRICT,

Defendants.

NOTICE OF MOTION TO QUASH/PROTECTIVE ORDER/AND OPPOSITION TO PLAINTIFFS MOTION TO COMPEL COMPLIANCE WITH A SUBPOENA DUCES TECUM

Justice Assigned: Hon. L. Michael Mackey, J.S.C.

Return Date: May 5, 2023

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PLEASE TAKE NOTICE, that upon the annexed Affirmation of Robert P. Louttit, dated April 26, 2023, the exhibits annexed thereto and all pleadings and proceedings heretofore had herein, GRAPHIC ARTS MUTUAL INSURANCE COMPANY ("Graphic Arts"), who is *not* a party to this action, will move this Court, in the Courthouse located at 16 Eagle Street, Albany, New York on the 5th day of May, 2023 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order pursuant to CPLR §2304 and §3103, quashing, limiting and/or protecting non-party GRAPHIC ARTS MUTUAL INSURANCE COMPANY from the subpoena duces tecum issued by the Plaintiffs JOHN DOE I and JOHN DOE II ("Plaintiffs"), dated December 16, 2022 and granting such other and further relief as this Court deems just and proper..

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, shall be served in accordance with CPLR §2214.



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Dated: Melville, New York April 26, 2023

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