

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF ULSTER

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JOHN DOE I and JOHN DOE II,

Plaintiffs,

-against-

WILLIAM J. DEDERICK, et al,

Defendants.

.....-X

Index No. EF2020-1189

**NOTICE OF MOTION  
TO COMPEL DISCOVERY  
PURSUANT TO CPLR §  
3124 AND OF GOOD FAITH  
EFFORT**

Return Date: September 27, 2023

Before:  
Hon. Justin Corcoran

**PLEASE TAKE NOTICE**, that upon the enclosed Affirmation of Daniel R. Lazaro, Esq. and the exhibits submitted therewith, Plaintiffs John Doe I and John Doe II will move this Court, before the Hon. Justin Corcoran, assigned Justice in this action, at the Courthouse for the Supreme Court for the County of Albany, 16 Eagle Street, Room 102, Albany, New York, 12207, or such other location as the Court may set, on the 27th day of September, 2023 at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to CPLR § 3214, directing defendant Kingston City School District to produce complete personnel records of [REDACTED], and [REDACTED] as requested through Plaintiffs’ Second Set of Document Requests dated September 4, 2021 and Plaintiffs’ January 25, 2023 Letter to Kingston City School District regarding the District’s deficient responses to Plaintiffs’ First Set of Interrogatories and First Set of Document Requests; and for such other and further relief as the Court deems just and proper.

An affirmation that a good faith effort has been made to resolve the issues raised in

this motion is attached.

Please take further notice that pursuant to CPLR section 2214(b), answering papers, if any, are required to be served upon the undersigned at least seven (7) days prior to the return date of this motion.

Dated: New York, New York  
August 29, 2023

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