

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

PRESENT: HON. EILEEN BRANSTEN
Justice

PART 3

GEORGE GOWEN,
Plaintiff,

INDEX NO. 650646/2014

MOTION DATE 2/20/2018

MOTION SEQ. NO. 010

- v -

HELLY NAHMAD GALLERY, INC., DAVID NAHMAD, HELLY
NAHMAD, INTERNATIONAL ART CENTER, S.A.,
Defendant.

DECISION AND ORDER

The following e-filed documents, listed by NYSCEF document number 614-726, 738, 770-780, 811,
813-891, 915-946, 987, 988, 1243-1261, 1298, 1299, 1304, 1306, 1307, 1308, 1309, 1310, 1311, 1315,
1316, 1326-1390, 1399, 1400, 1401, 1402, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414,
1415, 1416, 1417, 1418, 1419, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1434, 1435, 1436, 1437,
1438, 1439, 1440, 1441

were read on this application to/for Dismiss

Upon the foregoing documents, it is

ORDERED Defendant's Motion to Dismiss is WITHDRAWN without prejudice as stated on
the attached January 31, 2018 record and transcript (Rachel C. Simone, CSR) at 8:18-19:16.

21 20 /2018
DATE

Eileen Bransten
EILEEN BRANSTEN, J.S.C.

CHECK ONE:

- CASE DISPOSED
GRANTED
SETTLE ORDER
DO NOT POST

DENIED

- NON-FINAL DISPOSITION
GRANTED IN PART
SUBMIT ORDER
FIDUCIARY APPOINTMENT

OTHER

REFERENCE

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK : PART 3

-----X

GEORGE W. GOWEN as LIMITED ANCILLARY ADMINISTRATOR  
OF THE ESTATE OF OSCAR STETTNER,

Plaintiff(s),

- against -

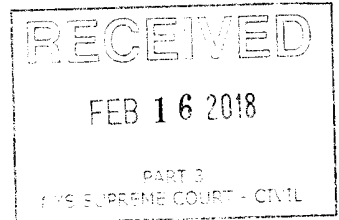
HELLY NAHMAD GALLERY INC, HELLY NAHMAD (NEW YORK),  
Individually, DAVID NAHMAD and INTERNATIONAL ART  
CENTER S.A.,

Defendant(s).

-----X

Index No. 650646/2014

January 31, 2018  
60 Centre Street  
New York, New York



B E F O R E: HONORABLE EILEEN BRANSTEN, JSC

A P P E A R A N C E S:

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White Plains, New York 10605  
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AARON RICHARD GOLUB, ESQUIRE, PC  
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35 East 64th Street  
New York, New York 10065  
BY: NEHEMIAH S. GLANC, ESQ.  
RUSSELL I. ZWERIN, ESQ.

Rachel C. Simone, CSR, RMR, CRR

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THE COURT: George W. Gowen as Limited Ancillary Administrator of the Estate of Oscar Stettner, I have from the Landrigan & Aurnou LLP firm, Joel Aurnou.

MR. AURNOU: Yes, your Honor.

THE COURT: For Helly Nahmad gallery, I have from the Aaron Richard Golub Esquire PC firm, Nehemiah S.

Glanc --

MR. GLANC: Hello, Judge.

THE COURT: And Russell Zwerin.

MR. ZWERIN: Yes. Hello, your Honor.

THE COURT: I have two things address, but first before me is Motion Sequence 20 which is a motion to vacate a decision made by the Special Master in this matter. The Court is going to tell you its decision.

Background: This action concerns a painting Seated Man with a Cane by Amadeo Modigliani which was purportedly confiscated by the Nazis during World War II and later sold in 1944 without the true owner's consent. Plaintiff, George W. Gowen, serves as a limited ancillary administrator of the estate of Oscar Stettner, the true owner of the painting.

Mr. Stettner's sole heir is Philippe Maestracci, a resident of France. Defendants are Helly Nahmad Gallery, David Nahmad, Helly Nahmad, collectively the Nahmad defendants, and the International Art Center, otherwise

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## Proceedings

known as IAC.

Plaintiff claims that defendants exhibited the paintings at defendant Helly Nahmad Gallery in 2005 and later in 2008, offered the painting at auction at Sotheby's in New York City. After failing to sell at the 2008 auction, defendants purportedly moved the painting to a warehouse in Switzerland. Mr. Maestracci claims he wrote to the gallery on February 28, 2011 and demanded return of the painting. He wrote again to the gallery on March 29, 2011. Due to defendants' lack of response, plaintiff argues that the Nahmad defendants refused to return the painting as of August of 2011.

Plaintiff also claims that defendants identified IAC as the painting's nominal owner only after Phillippe Maestracci brought a 2011 federal action, since withdrawn, seeking the painting's return.

On May 21, 2016 Michael Tempesta was appointed as a Special Discovery Master by this Court. On November 6, 2017 Special Master Tempesta denied Request Number 21 of plaintiff's first notice of discovery and inspection. Request Number 21 was denied insofar as it sought an order requiring defendant International Art Center to produce an affidavit stating that it conducted no provenance research and exclusively relied on the provenance in Christie's catalog in connection with the 1996 Christie's auction.

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Special Master Tempesta stated that requiring such a document to be created goes beyond the parameters of his discovery order so ordered on February 10, 2017 which included document requests granted on consent.

Motion Sequence Number 20, plaintiff's motion to vacate Special Master's discovery order as it pertains to Request Number 21: In its memorandum of law, the plaintiff really recounted the facts in the case and didn't go into any major citations of law. Plaintiff argues that the Special Master's ruling is contradictory insofar as it requires plaintiff to secure affidavits sworn to by Mondex and Maestracci stating they have conducted thorough searches and have produced to defendants all documents responsive to defendants' Request Number 9 and Number 38. See Aurnou affirmation, Exhibit 1. The same order denied plaintiff's request number 21.

Plaintiff states that this inconsistency in Special Master's ruling warrants the present motion. Brief at Page 2, memorandum of law at Page 2.

Defendants argue that a Court may only set aside the decision if the Special Master clearly exceeded his authority or misapplied the prevailing law. See Matter of Casale versus Metropolitan Transportation Authority, 23 Misc. 3d 1121(A) at \*9, Supreme Court New York County, 2009, by the late Justice Louis B. York. See also Poster versus

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Poster, 4 AD3d, it 145 at Page 145 First Department 2004. (stating the recommendations of a Referee were entitled to "great weight" and a Court will, generally, not disturb those findings if the determination is substantiated by the record.)

This Court finds that the Special Master neither exceeded his authority when issuing the November 6, 2017 order, nor did he miss apply the prevailing law.

An order requiring an affidavit that would indicate there are no further responsive documents fits within New York's established law. See E.G. Jackson versus City of New York, 185 AD2d 768,770, First Department 1992 (requiring the party to procure an affidavit which made a showing as to where the subject records were likely to be kept, what efforts, if any, were made to preserve them, whether such records were routinely destroyed, or whether a search had been conducted in every location where the records were likely to be found.) That is the finding in Jackson.

In contrast, the plaintiff's Request Number 21 seeks a creation of testimonial evidence as to whether the defendant performed any diligence on his own with regard to the provenance of the painting. Absent a compelling reason not to accord the ruling of the Special Master the "great deference" that it is entitled to, this Court refuses to

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vacate the Special Master's ruling. See Poster versus Poster, 4 AD3d 145, 145, First Department 2004. See also, the same finding in the Matter of Casale, that's the 2009 case.

The Court does note, however, that the plaintiff is not barred from asking questions about defendant IAC's provenance inquiries during the course of discovery or from raising the issue during trial at any time. So it can be done in depositions, it can be done at trial, but not by requiring an affidavit.

Rather, this Court merely concludes that obtaining the testimonial affidavit is a shortcut rather than an entitlement, and that the plaintiff may attempt to obtain the answers it seeks through a proper recourse, i.e. conducting a deposition.

So the plaintiff's motion to vacate the November 6, 2017 order of the Special Discovery Master Michael Tempesta is denied.

Also, there is something that is of tremendous concern to this Court, and that is that the plaintiff states that throughout defendants' productions there have been redactions made to documents without coming to this Court pursuant to Rule 216.1 for a sealing motion. That is not acceptable. The plaintiff is entitled to look at the unredacted documents. If you want anything redacted filed

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in this Court, you must do so pursuant to 216.1 which is a sealing motion.

MR. GLANC: Your Honor, I haven't filed any redacting documents. He is talking about documents that I produced for discovery which were -- some were redacted which has to go in front of the Referee.

The Referee has ordered --

THE COURT: Sir, sir, listen to me. You are operating under a confidentiality agreement, right?

MR. GLANC: Yes. I understand what you are going to say, your Honor, but --

THE COURT: You cannot redact anything. You can go to the Referee, but guess what? He is entitled to unredact a document.

When you use those documents in anything to support, any argument --

MR. GLANC: Which I have not.

THE COURT: -- then you have to do a sealing motion.

MR. GLANC: But in the first instance, Judge, we go before Referee Tempesta. And I am willing also to give the documents in camera to Referee Tempesta to --

THE COURT: You have to speak up.

MR. GLANC: I am always willing to give documents unredacted to Referee Tempesta in camera to make rulings.

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Nobody's even brought it up.

THE COURT: Sir, he is entitled to unredacted documents pursuant to the confidentiality agreement. You are not to decide what he is entitled to see. He is entitled to see unredacted documents.

MR. GLANC: The Referee has already ordered that any information concerning other paintings, other than the subject painting is not a subject of discovery and may be redacted.

THE COURT: That's true. Then you have to follow Referee Tempesta.

You are not entitled to see documents concerning other paintings, but you are entitled to see everything that concerns this, but you have to go through Special Referee Michael Tempesta.

MR. AURNOU: Yes.

THE COURT: Now we are going to get to Motion Sequence 10, which is a so-called motion to dismiss.

Background: On April 22, 2016, defendants filed the instant motion to dismiss this action pursuant to the following: CPLR 327, an inconvenient forum; CPLR 3211(a)(1) where a defense is founded on documentary evidence; CPLR 3211(a)(2), lack of subject matter jurisdiction; CPLR 3211(a)(3), lack of capacity to sue; CPLR 3211(a)(4), the existence of another action pending in the New York

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Surrogates Court; CPLR 3211(a) (5), the existence of one of the following conditions: A prior arbitration and award, collateral estoppel, discharge in bankruptcy, infancy or other disability of the moving party, payment, release, res judicata, statute of limitations, or statute of frauds; CPLR 3211(a) (7) failure to state a cause of action; CPLR 3211(a) (8), lack of personal jurisdiction; CPLR 3211(a) (10), absence of a necessary party.

There were no other sections in the CPLR 3211(a) that you could figure out that as reasons to make the motion to dismiss?

MR. GLANC: There was also, I think, a 3025.

THE COURT: Well, I am getting to that.

MR. GLANC: Sorry, Judge.

THE COURT: Further, the motion requests the Court take judicial notice of both French and Swiss law which may or may not be considered when this Court ultimately renders its decision pursuant to CPLR Rule 4511(b) and 4511(d).

The filings in connection with this motion span from my NYSCEF Document Number 614 to my NYSCEF Document Number 1,437. It's all for Motion Sequence 10.

On April 22, 2016 the defendants filed attorney Glanc's 25-page affirmation with 67 exhibits, Document Numbers 614 to 682; a 25-page affirmation as to the French laws and standards with 19 exhibits from defendants' expert

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Annelies Sam-Simenot, Document Numbers 683 to 702; a 21-page affirmation as to Swiss law and standards with 13 exhibits from defendants' expert Rudolphe Gautier, Document numbers 703 through 717; and two-page affidavit from defendant David Nahmad with two exhibits, Document numbers 718 to 720; a 25-page memorandum of law, Document Number 721.

Prior to opposition being filed a series of letters were exchanged concerning a series of redactions made on some defendants' exhibits, Document numbers 770 to 813. That's my NYSCEF, 770 through 813.

According to defendants' May 12, 2016 letter, "certain redactions remain in place as redacted information concerns other works of art and financial information related thereto which have nothing whatsoever to do with this action or the subject painting." NYSCEF Document Number 774. Defendants offered to submit these documents for in camera review, Document Number 811.

It should be noted, it doesn't appear a sealing motion was done on those exhibits. And any time, any time an exhibit is relied upon in any kind of motion and there is desire to be redactions thereto, there must be a ceiling motion, Mr. Glanc, all right? That's Rule 216.1.

MR. GLANC: Yes, your Honor.

THE COURT: So your idea that it is something beyond, that's something the Court decides, not Mr. Glanc.

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When the parties redo this motion, they should note that the proper method of submitting motions with redactions is to do a motion to seal.

Opposition papers included attorney Aurnou's 16-page affirmation with 16 exhibits, Document Numbers 814 to 830; an 11-page affirmation with 31 exhibits from plaintiff's expert Jonathon James Palmer, Document numbers 831 to 862; a 12-page affidavit with 27 exhibits from plaintiff's expert Waldemar Herman de Boer, Document Numbers 863 to 890; and a 25-page opposition brief, Document Number 891.

Defendants' reply papers include a 10-page affirmation from defendants' expert Annelies Sam-Simenot, Document 915, a three-page affirmation from defendants' expert Rudolphe Gautier with one exhibit, Document Number 916 and 917; a 10-page affirmation from attorney Golub with one exhibit, Document Number 819 -- I'm sorry, Document Number 918 to 919; a two-page affidavit from Lucian Simmons, Document Number 920; a two-page affidavit from Helly Nahman with two exhibits, Document Number 921 through 923; a six-page memo affirmation from attorney Glanc with four exhibits, Document Numbers 929 through 931; a 14-page affirmation from Judith Schub with two exhibits, Document numbers 929 to 931; a two-page affirmation from Thomas Seydoux, Document Number 932; a second two-page affirmation

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from Judith Schub, Document Number 933; a four-page affidavit from Leanne Standley, Document Number 934; a three-page affidavit from Frances Beatty, Document Number 935. There is a document which is labeled a reply memoranda of law on the NYSCEF which, when opened, appears to be a copy of the Frances Beatty affidavit, Document Number 936 and a second four-page affidavit from Leanne Standley with two exhibits, Document Number 937.

The Court can permit the a surreply resulting from arguments made in plaintiff's opposition that allegedly addressed documents that did not exist at the time of the filing of the opposition; Document Number 940, surreply affirmation.

On July 5, 2016, defendants filed the surreply which consisted of a three-page Court ordered surreply affirmation with five exhibits, Document Numbers 940 through 945; a 12-page surreply memorandum of law, Document Number 946.

The parties appeared on August 26, 2016 and submitted the transcript on August 30, 2016. And this motion was marked fully submitted on August 30, 2016, the date of the receipt of the transcript.

Now, here are the events since the fully is submission of the motion, Motion Sequence 10.

At the end of 2016, the United States Congress

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passed a Holocaust Expropriated Art Recovery Act of 2016, otherwise known as the HEAR Act which, among other things, altered, nationwide, statutes of limitations for art taken by the Nazis during the Holocaust.

On February 14, 2017 the Court received a copy of an Appellate Division decision pertaining to the matter in the Surrogates Court. That matter involved the same parties, the same piece of art at issue. And the decision purportedly moots defendants' argument in the instant motion regarding jurisdiction, Document numbers 987 and 988. Leave to appeal to the Court of Appeals, the Appellate Division, was denied on August 1, 2017.

As a result of the HEAR Act, this Court permitted additional briefing. On September 11, 2017 this Court received a 14-page brief on the HEAR Act which was accompanied by 17 exhibits. That's NYSCEF Document numbers 1243 through 1260.

It should be noted that some of the attached exhibits pertain to decisions in the Surrogates Court which purportedly address similar subject mater as those raised in the instant motion.

On October 23, 2017 plaintiff submitted a 19-page letter brief on the HEAR Act which was accompanied by four exhibits, Document Numbers 1306 through 1310.

On November 6, 2017 this court received a letter

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2 notifying this Court of an Appellate Division decision and  
3 order dated November 2, 2017 which modified this Court's  
4 decision and order of January 14, 2016 and additionally  
5 addressed aspects of the HEAR Act.

6 On November 17, 2017 defendants submitted  
7 "opposition to the plaintiff's opposition letter dated  
8 October 23, 2017," Document Number 1326. This opposition  
9 included a 12-page letter brief with one exhibit, Document  
10 Numbers 1325 to 1326; a 25-page affirmation of Annelies  
11 Sam-Simenot with an additional 23 exhibits, Document numbers  
12 1328 through 1351; an 8-page affirmation from Judith Schub  
13 with an additional 23 exhibits, Document numbers 1352 to  
14 1375; a 23-page affirmation by Rudolphe Gautier with three  
15 exhibits, Document Numbers 1376 through 1379.

16 On November 21, 2017 plaintiff responded to  
17 defendants' November 17 letter and requested this Court take  
18 judicial notice of a recent French Court ruling involving an  
19 unrelated painting, Document Numbers 1380 through 1382.

20 On November 27, 2017 defendants sought permission  
21 to respond to this most recent filing, Document Number 1384.  
22 That same day, the plaintiff sought permission to respond to  
23 the alleged new arguments raised in defendants' November 17  
24 letter, document number 1388. This letter included two  
25 exhibits, Document Numbers 1389 and 1390.

26 On November 29 of 2017 defendants filed an

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 2 additional letter brief with one exhibit accompanied by an  
 3 affirmation from Annelies Sam-Simenot, Document Numbers 1399  
 4 through 1401. Also on November 29 plaintiff submitted their  
 5 letter seeking to enter various affidavits and exhibits that  
 6 could not have been gotten previously which plaintiff  
 7 purports address defendants' new arguments. See Document  
 8 Numbers 1402 through 1423.

9 The various submissions came from Venice, Paris,  
 10 London, and Toronto and address "new issues" in defendants'  
 11 November 17 letter. See Document Number 1424, the  
 12 December 8, 2017 letter submission from plaintiff arguing  
 13 the need for this new material.

14 On December 8, 2017, and again on December 11,  
 15 2017, plaintiff filed an additional letter which forwarded  
 16 the affirmation of Melina Wollman which was purportedly  
 17 received that day, Document Number 1426 through 1427.

18 On December 14, 2017 defendants filed an 11-page  
 19 opposition letter to plaintiff's submissions pertaining to  
 20 the application of foreign law, Document Number 1429.

21 On January 23, 2018 this Court received a letter  
 22 from plaintiff which purports to have forwarded along with  
 23 the transcript of an interview with defendant Nahmad which  
 24 purportedly had some impact on this motion, Document Numbers  
 25 1434 through 1435.

26 On January 23, 2018 defendants requested

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permission to supplement their prior forum non conveniens arguments with additional briefing, Document Number 1436.

On January 24, 2018, the plaintiff responded to this letter noting that defendants' current assertions are at odds with prior statements, Document Number 1437.

On January 26, 2018, defendants replied with additional arguments, Document Number -- we will get it for you in a minute. (Brief Pause) That is Document numbers 1438 through 1440.

This Court does not have a motion before it that it can resolve, so Motion Sequence 10 is going to be withdrawn by the party that made it. I will not do it with prejudice. You will be entitled to make the same arguments that you want, but it is going to be slightly different.

Given that the parties have sought leave to make additional arguments for nearly two years and that there have been changes to the applicable law and changes to the relevant facts underlying this motion, the motion now significantly differs from its initial motion. The motion cannot be decided at this time given the numerous developments that have occurred on this matter.

The parties are ordered to withdraw Motion Sequence 10 and resubmit it in proper sequence order. There will be no surreplies to this new motion. No letters containing additional arguments will be accepted. The

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1 parties will scrupulously comply with the Commercial  
 2 Division Rule 17 regarding the length of the papers, and  
 3 Rule 17 reads: "Unless otherwise permitted by this Court,  
 4 (i), briefs or memoranda of law shall be limited to 25 pages  
 5 each. They shall contain a table of contents and they also  
 6 shall contain a table of cases; (ii) reply memoranda of law  
 7 shall be no more than 15 pages and shall not contain any  
 8 arguments that do not respond or relate to those memoranda  
 9 in chief; (iii), affidavits and affirmations shall be  
 10 limited to 25 pages each. You may make your motion. I will  
 11 give you a briefing schedule.  
 12

13 This is a 2014 case, I am a very kindly person,  
 14 but there seems to me to be an enumerable amount of things,  
 15 so you are going to have to whittle it down to 25 pages.  
 16 You have to decide your best arguments and get it down to 25  
 17 pages. You have to decide what points you want to make, not  
 18 everything under the sun. Tell me what is the issue.

19 You will have for the moving motion to dismiss  
 20 until February 20 of this year. You will do so by order to  
 21 show cause not because it merits an order to show cause, but  
 22 because I don't want it to languish downstairs. So you come  
 23 to me with an order to show cause. The order to show cause  
 24 will include these dates: February 20 for initial motion to  
 25 dismiss. You will be replying to their motion to dismiss no  
 26 later than March 6 -- wait a second. I will give you to

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March 13 because between the February 20 and March 13 there is both -- oh, no. It is okay. It is Purim that comes in between February 28 and March 1. So opposition will be on March 6.

Can you do that?

MR. AURNOU: Thank you.

THE COURT: Reply will be on March 13 -- actually, I will give you a couple more days to March 15. Actually, I can't hear you until the 18th of April, so I will give everybody a little more time.

So you will do your motion to dismiss by the 20th, all right?

MR. AURNOU: Of February?

THE COURT: Yes. You will do opposition not on the 6th but on the 13th. That gives you, basically, three weeks.

MR. AURNOU: 13th. Thank you very kindly.

THE COURT: I will do reply two weeks after on the 27th. It will be fully submitted on the 27th. No additional letters, nothing thereafter. I will hear or decide the case on the 18th of April. That will be the date you will come back and I will do my decision on the motion to dismiss, all right?

I urge you to think out this case. Do it so that it is concise, so that your arguments are precise, and,

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indeed, the arguments are supported by law. As to exhibits, they are to be de minimis, no Annelies Sam-Simenot affirmations of 10, 15, 25, 35 pages. None. All right? If you need that kind of a thing, make it very de minimis and on the point.

You cannot use exhibits as part of your, in a sense, argument in chief. You cannot abuse this Court with a plethora of statements by people who have no idea of the import whatsoever. Get down to the basics, write a good brief, write a good opposition, be precise, give me good law, and I will deal with the motion.

That constitutes the decision and order of the Court.

Motion number 10 is withdrawn, am I right?

MR. GLANC: Yes.

Judge, just a housekeeping matter? February 20 may be a bad date. Also, I need to get affirmations from overseas.

THE COURT: I can't hear you.

MR. GLANC: February 20 may be a bad date. I also need to get some affirmations from overseas, so maybe a little extra time?

THE COURT: No. You have every affirmation known to man. You can recycle the affirmations. I didn't say you have to get fresh anything.

Rachel C. Simone, CSR, RMR, CRR

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Reporter Certification

MR. GLANC: And I can refer to exhibits by using the NYSCEF numbers?

THE COURT: What's that?

MR. GLANC: Can I refer to the exhibits by referring to NYSCEF numbers?

THE COURT: No, sir. Everything we have done so far is basically gone. It is withdrawn. Redo it. And don't abuse this Court. To me I have been abused. And I don't like the staff being abused. I mean, we have things up to here (indicating). It's just letter after letter after letter. It's ridiculous. It is an abuse and I will not tolerate it, so start fresh again and do it right.

Have a good day, gentlemen.

MR. GLANC: Thank you, Judge.

MR. AURNOU: Thank you, Judge.

\* \* \*

The foregoing is hereby certified to be a true and accurate transcript of the proceedings.

\_\_\_\_\_  
Rachel C. Simone  
Senior Court Reporter

Rachel C. Simone, CSR, RMR, CRR

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