

SUPREME COURT : STATE OF NEW YORK
COUNTY OF NEW YORK

IAS Part 30 Heitler J.

SUSAN CHARNEY,

Plaintiff,

-against-

NORTH JERSEY TRADING CORPORATION,
ALEXANDER FRIED, JUDITH HERSKOWITZ,
XXXX HERSKOWITZ and XXX
HERSKOWITZ,

Defendants.

**NOTICE OF
CROSS MOTION**

Oral Argument Requested

Index No. 24517/88

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Judith Herskowitz sworn to on September 26, 2005 together with Exhibit attached, the Memorandum of Law and upon the prior proceedings herein, the undersigned will move this Court at the courthouse thereof, at the Motion Submission Part, 60 Centre Street, Room 130, New York, New York, on September 30, 2005 at 9:30 o'clock in the forenoon as soon thereafter as counsel may be heard, for an Order vacating and setting aside this Court's Decision and Order of April 13 2005 and April 13, 2005 pursuant to New York CPLR § 2221(a) and §5015.

Dated: September 26, 2005
Miami Beach, Florida

Respectfully submitted,

JUDITH HERSKOWITZ J.D.
Defendant Pro se
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By: _____
JUDITH HERSKOWITZ

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