

KAUFMAN BORGEEST & RYAN LLP

120 BROADWAY

NEW YORK, NY 10271

(212) 980-9600

FAX: (212) 980-9291

FACSIMILE TRANSMITTAL SHEET

TO:

Harry Dorvilier

FROM:

Daniel J. Wityk, Esq.

COMPANY:

Harry's Nurse's Registry, Inc.

DATE:

April 4, 2018

FAX NUMBER:

(718) 739-0102

TOTAL NO. OF PAGES INCLUDING COVER:

9

PHONE NUMBER:

SENDER'S REFERENCE NUMBER:

690.030

RE:

Mondesir v. Harry's Nurses, et al.

YOUR REFERENCE NUMBER:



URGENT

☐ FOR REVIEW☐ PLEASE COMMENT☐ PLEASE REPLY☐ PLEASE RECYCLE

PRIVILEGED & CONFIDENTIAL

Please see attached.

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify us immediately by telephone, and return the original message to us via postal service. Thank you.

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KAUFMAN BORGEESE & RYAN LLP

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DWITYK@KBRLLAW.COM

April 4, 2018

VIA REGULAR MAIL
AND FAX (718-739-0102)

PRIVILEGED AND CONFIDENTIAL

Harry's Nurse's Registry, Inc.
88-25 163rd Street
Jamaica, New York 11432

Attn: Sharon Glasgow

Re: Cynthia Mondesir, Administrator of the Estate of Naomi Mondesir, Deceased, and
Cynthia Mondesir, Individually v. Harry's Nurses Registry, et al.
Our File No.: 690.030

Dear Ms. Glasgow:

As you know, we represent the interests of Harry's Nurse's Registry in the above-referenced legal matter.

Please find enclosed a copy of a judicial subpoena directing you to appear for a deposition in this litigation on May 3, 2018 at 2:00 p.m. A check has also been enclosed in the amount of \$15.00 as a fee owed to you in compensation for your appearance.

As mentioned in our phone conversation, you will need to meet with us at 1:00 p.m. on the day of the deposition on May 3rd. A location for the deposition will be determined at a future time, which we will confirm with you soon.

We will also need to meet with you to prepare for the deposition on a day prior to the deposition date on May 3rd. We will be in touch soon to schedule this meeting with you.

Finally, we ask that you please notify Harry Dorvilier of this deposition date which has ordered pursuant to judicial subpoena.

If you have any further questions or concerns, please do not to hesitate to contact the undersigned. Thank you.

Very truly yours,

KAUFMAN BORGEESE & RYAN LLP


Daniel J. Wityk

NEW YORK

NEW JERSEY

CONNECTICUT

CALIFORNIA

4759237

(710) 291-3400

18262

SHAEVITZ SHAEVITZ & KOTZAMANIS

ATTORNEY PROFESSIONAL ACCOUNT

148-55 HILLSIDE AVE

JAMAICA, NY 11435

EFT/Check Fraud
Protection for Business

1-1357/260

PAY
TO THE
ORDER OF

DATE

3-26-18

Sharon Glasgow RN \$ 15.00

15 DOLS 00 CTS

DOLLARS

FOR

Signature
Naomi Mondesir

⑈018262⑈ ⑈026013576⑈ ⑈1503036025⑈

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

-----X
CYNTHIA MONDESIR, as Administrator of the
Estate of NAOMI MONDESIR, deceased and
CYNTHIA MONDESIR, individually, JOY WATSON,

JUDICIAL SUBPOENA

Plaintiff(s),

-against-

Index No.: 8536/15

710246/2020

OLUYEMISI ADEBAYO and HARRY'S NURSES
REGISTRY, INC.,

Defendant(s).

-----X
HARRY'S NURSES REGISTRY, INC.

Third-Party Plaintiff(s),

-against-

GARDITE MONDESIR and EDDY MONDESIR,

Third-Party Defendants.

-----X
TO: SHARON GLASGOW, RN
Kaufman, Borgeest & Ryan, LLP
120 Broadway, 14th Floor
New York, New York 10271

GREETINGS:

You are hereby commanded to appear for an examination before trial to be held at the Office of **SHAEVITZ, SHAEVITZ & KOTZAMANIS, located at 148-55 Hillside Avenue, Jamaica, New York 11435** on **Thursday, May 3, 2018 at 2:00 o'clock in the afternoon** to testify and give evidence as a non-party witness on behalf of the infant plaintiff NAOMI MONDESIR in the above captioned action. This examination is necessary since it is believed that you have personal knowledge in the alleged an accident that occurred on April 21, 2015 on is 255-26 Memphis Avenue, Rosedale, in the County of Queens, City and State of New York.

For your failure to attend, you will be deemed guilty of a contempt of this Court as well as liable for all losses and damages sustained thereby to the party aggrieved and to a penalty of fifty (\$50.00) dollars in addition thereto.

Dated: Jamaica, New York
March 26, 2018



By: Dimitri Kotzamanis, Esq.
SHAEVITZ, SHAEVITZ & KOTZAMANIS
Attorneys for Plaintiff(s)
148-55 Hillside Avenue
Jamaica, New York 11435
718) 291-3400

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

-----X
CYNTHIA MONDESIR, as Administrator of the
Estate of NAOMI MONDESIR, deceased and
CYNTHIA MONDESIR, individually, JOY WATSON,

Plaintiff(s),

-against-

**NOTICE TO TAKE
DEPOSITION UPON
ORAL EXAMINATION**

Index No.: 8536/15

OLUYEMISI ADEBAYO and HARRY'S NURSES
REGISTRY, INC.,

Defendants.

-----X
HARRY'S NURSES REGISTRY, INC.,

Third-Party Plaintiff(s),

-against-

GARDITE MONDESIR and EDDY MONDESIR,

Third-Party Defendants.

-----X

S I R S :

PLEASE TAKE NOTICE, that pursuant to Article 31 of the Civil Practice Law and Rules the testimony, upon oral examination of **SHARON GLASGOW, RN** as a non-party witness, will be taken before a Notary Public, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein at **SHAEVITZ, SHAEVITZ &**

KOTZAMANIS, located at 148-55 Hillside Avenue, Jamaica, New York 11435 on Thursday, May 3, 2018 at 2:00 o'clock in the afternoon of that day with respect to evidence material and necessary in the prosecution of this action:


All of the relevant facts and circumstances in connection with the issues arising herein.

That the said person to be examined is required to produce at such examination the following:

ALL BOOKS, RECORDS, DOCUMENTS AND MATERIALS RELATIVE TO THE ABOVE.

Dated: Jamaica, New York
March 26, 2018

Yours truly,


By: Dimitri Kotzamanis, Esq.
SHAEVITZ, SHAEVITZ & KOTZAMANIS
Attorneys for Plaintiff(s)
148-55 Hillside Avenue
Jamaica, New York 11435
718-291-3400

To: KAUFMAN, BORGEESE & RYAN, LLP
Attorney(s) for Defendant(s) and Third-Party Plaintiff(s)
HARRY'S NURSES REGISTRY, INC.
120 Broadway, 14th Floor
New York, New York 10018
(212) 980-9600

HANNUM, FERETIC, PRENDERGAST & MERLINO, LLC
Attorney(s) for Third-Party Defendant(s)
GARDITE MONDESIR and EDDY MONDESIR
55 Broadway, Suite 202
New York, New York 10006
(212) 530-3900
File No.: 17A372H

INDEX NUMBER: 8536/15

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

CYNTHIA MONDESIR, as Administrator of the Estate of NAOMI MONDESIR, deceased and CYNTHIA MONDESIR, individually,

Plaintiff(s).

-against-

OLUYEMISI ADEBAYO and HARRY'S NURSES REGISTRY, INC.,

Defendant(s).

HARRY'S NURSES REGISTRY, INC.,

Plaintiff(s).

-against-

GARDIE MONDESIR and EDDY MONDESIR,

Defendant(s).

**JUDICIAL SUBPOENA and NOTICE TO TAKE
DEPOSITION UPON ORAL EXAMINATION OF SHARON GLASGOW, RN**

SHAEVITZ, SHAEVITZ & KOTZAMANIS

Attorneys for Plaintiff (s)

Office and Post Office Address, Telephone

148-55 Hillside Avenue

Jamaica, New York 11435

"WE DO NOT ACCEPT SERVICE BY ELECTRONIC TRANSMISSION (FAX)"

To: Attorney(s) for

Service of a copy of the within is hereby admitted
Dated: , 20 .

**PLEASE TAKE NOTICE
NOTICE OF ENTRY**

That the within is a (certified) true copy of an ORDER entered in the office of the clerk of the within named court on , 20 .

NOTICE OF SETTLEMENT

That an Order of which the within is a true copy will be presented for settlement to the Hon. one of the judges of the within named court, at on , 20 , at 10:00 A.M.

Dated: Jamaica, New York

To: SHAEVITZ, SHAEVITZ & KOTZAMANIS
Attorney for Plaintiff(s)
148-55 Hillside Avenue
Jamaica, New York 11435
(718) 291-3400