

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JACOB TEITELBAUM, individually and as father to  
CHILD A and CHILD B,

Plaintiff,

-against-

**ATTORNEY  
DECLARATION**

JUDA KATZ; CHAYA KATZ; JOEL TENNENBAUM;  
BLUMA TENNENBAUM; DAVID RUBENSTEIN;  
KIRYAS JOEL COMM AMBULANCE CRP; DISTRICT  
FAMILY COURT OF ORANGE COUNTY 9<sup>TH</sup> JUDICIAL  
DISTRICT; HON. ANDREW P. BIVONA; ATTY. MARIA  
PETRIZIO; CHILDREN'S RIGHTS SOCIETY OF  
ORANGE COUNTY; ATTY. KIM PAVLOVIC; ATTY  
JOHN FRANCIS X. BURKE; CHILD PROTECTIVE  
SERVICES OF ORANGE COUNTY; DEPARTMENT OF  
SOCIAL SERVICES OF ORANGE COUNTY; CHRISTINE  
BRUNET; ATTY. STEPHANIE BAZILEOR; JOHN DOES 1  
THROUGH 95; JANE DOES 1 THROUGH 20,

12-CV-02858 (VB)

Return Date:

Defendants.  
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**TERENCE S. HANNIGAN**, an attorney duly admitted to practice law before the United States District Court for the Southern District of New York, declares the following to be true under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am a member of Hannigan Law Firm PLLC, the attorneys for Defendant David Rubenstein. I am fully familiar with the prior proceedings and papers filed in this action, and I submit this Declaration in support of Defendants' motion to dismiss, pursuant to F.R.C.P. 4(m), F.R.C.P. 12(b)(1), F.R.C.P. 12(b)(5), and F.R.C.P. 12(b)(6), in order to marshal exhibits in support of the motion.

2. In accordance with Rule 7.2 of the Rules of the United States District Courts for the Southern and Eastern Districts of New York, plaintiff has been served with copies of

cases cited in the Defendants' Memorandum of Law that are unpublished or are reported exclusively on computerized databases.

3. For the reasons set forth in Defendants' Memorandum of Law, I respectfully request that the Court issue an order granting Defendants' motion to dismiss the complaint in its entirety, and granting such other and further relief as the Court deems just and proper.

Dated: Latham, New York  
December 14, 2012



TERENCE S. HANNIGAN (TH0507)