

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACOB TEITELBAUM,

Docket No. 12-CV-2858(VB)

Plaintiff,

**PRE-ANSWER NOTICE
OF MOTION**

-against-

JUDA KATZ; CHAYA KATZ; JOEL TENNENBAUM;
BLUMA TENNENBAUM; DAVID RUBENSTEIN;
KIRYAS JOEL COMM AMBULANCE CRP; DISTRICT
FAMILY COURT OF ORANGE COUNTY 9TH JUDICIAL
DISTRICT; HON. ANDREW B. 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;
CHRISTINE BRUNET; ATTY STEPHANIE BAZILEOR;
JOHN DOES 1 THROUGH 95; JANE DOES 1-20;

Defendants.

MOTION BY:

Patrick T. Burke, Esq.
Attorney for Defendant, John F. X. Burke, Esq.

DATE, TIME and PLACE:

March 6, 2013 at 10 a.m.; Judge Vincent
L. Briccetti, the United States District Courthouse,
Southern District of New York, 300 Quarropas Street,
Room 630, White Plains, New York 10601

RELIEF REQUESTED:

An Order dismissing the plaintiff's Amended
Complaint pursuant to F.R.C.P. 12(b)(6), with
prejudice. Motion made in lieu of Answer.

SUPPORTING PAPERS:

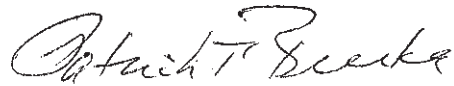
Affidavit of Patrick T. Burke and Memorandum of Law.

RESPONDING PAPERS:

Answering papers to be served by April 8, 2013 and
Reply papers to be served by April 22, 2013

Dated: Goshen, New York
February 25, 2013

Yours, etc.,



Patrick T. Burke, Esq. (PB 7471)
Burke, Miele & Golden, LLP
Attorney for Defendant,
John F. X. Burke, Esq.
40 Matthews Street – Suite 209
P. O. Box 216
Goshen, New York 10924
845-294-4080 – phone
845-294-7673 - fax

TO: Jacob Teitelbaum, pro se
5 Leipnik Way, #102
Monroe, New York 10950
845-782-8995

Gabarini & Scher, P.C.
Attn: Gregg D. Weinstock, Esq.
Attorneys for Defendant,
Maria A. Patrizio, Esq. s/h/a Maria Petrizio
432 Park Avenue South, 9th Floor
New York, New York 10016-8013
212-689-1113 - phone
email - gweinstock@garbarini-scher.com

David Darwin, Esq.
Orange County Department of Law
Municipal Law Division
15 Matthews Street, Suite 305
Goshen, New York 10924
845-291-3150 - phone
845-291-3167 – fax
email: ddarwin@orangecountygov.com

Taddeo & Shahn, LLP
Attn: Karen M. Taddeo, Esq.
Attorney for Defendant
Kiryas Joel Comm Ambulance CRP
473 South Salina Street, Suite 700
Syracuse, New York 13202
315-422-6666
email: ktaddeo@ts-law.com

Tarshis, Catania, Liberth, Mahon & Milligram, PLLC
Attn: Rebecca Mantello, Esq.
Attorneys for Defendant
Children's Rights Society of Orange County
One Corwin Court
P. O. Box 1479
Newburgh, New York 12550
845-565-1100
email: rmantello@tclmm.com