

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x 12-CV-02858 (VB)

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

Plaintiff,

-against-

**ATTORNEY'S FURTHER  
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,

Defendants.

-----x  
**JEFFREY B. SILER**, 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 and correct under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner in the Law firm of SILER & INGBER, LLP, the attorneys for Defendant, KIRYAS JOEL COMMUNITY AMBULANCE CORPORATION s/h/a KIRYAS JOEL COMM AMBULANCE CRP, (hereinafter "defendant"). I am fully familiar with the prior proceedings and papers filed in this action.

2. I submit this Further Declaration in support of defendant's motion to dismiss, pursuant to Fed. R. Civ. P. 12(b)(6) in order to marshal exhibits in support of the motion.

3. 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of New York, plaintiff has been served with copies of cases cited in the Defendants' Memorandum of Law that are unpublished or are reported exclusively on computerized databases.

4. For the reasons set forth in my original Declaration and the accompanying Memorandum of Law, I respectfully request that the Court grant Defendant's motion to dismiss the complaint in its entirety, with prejudice, together with such other and further relief as the Court deems just and proper.

Dated: Mineola, New York  
May 22, 2013

SILER & INGBER, LLP

By: 

Jeffrey B. Siler (JS4755)

*Attorney for Defendant*

*KIRYAS JOEL COMMUNITY AMBULANCE  
CORPORATION s/h/a KIRYAS JOEL COMM  
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