

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEVEN GREENE; GIOVANNA SANCHEZ-ESQUIVEL;
SARAH ARVIO; LISA COLLINS; ORITSEWEYIMI
OMOANUKHE AYU; and NEIL AMITABH, individually and on
behalf of all others similarly situated, and COMMUNITY ACCESS,
INC.; NATIONAL ALLIANCE ON MENTAL ILLNESS OF NEW
YORK CITY, INC.; CORRECT CRISIS INTERVENTION
TODAY – NYC; and VOICES OF COMMUNITY ACTIVISTS
AND LEADERS NEW YORK,

NOTICE OF MOTION

Plaintiffs, 21 Civ. 5762 (PAC)

- against -

CITY OF NEW YORK; ERIC ADAMS; BILL DE BLASIO;
KEECHANT L. SEWELL; DERMOT F. SHEA; NYPD POLICE
OFFICER MARTIN HABER; NYPD POLICE SERGEANT
CARRKU GBAIN, NYPD POLICE OFFICER VIKRAM PRASAD;
NYPD POLICE OFFICER ANDRE DAWKINS; NYPD POLICE
OFFICER TYRONE FISHER; NYPD POLICE OFFICER
DEVIENDRA RAMAYYA; NYPD POLICE OFFICER JULIAN
TORRES; NYPD OFFICER APRIL SANCHEZ; NYPD OFFICER
GABRIELE MORRONE; and NYPD OFFICERS JOHN and JANE
DOES # 1-40,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law;
and upon all prior pleadings and proceedings had herein, defendants City of New York, Eric
Adams, Bill de Blasio, Keechant L. Sewell, Dermot F. Shea, P.O. Martin Haber, P.O. Carrku
Gbain, P.O. Vikram Prasad, P.O. Andre Dawkins, P.O. Tyrone Fisher, P.O. Devindra Ramayya,
P.O. Julian Torres, P.O. April Sanchez, and P.O. Gabriele Morrone will move this Court before
the Honorable Paul A. Crotty, United States District Judge, at the United States Courthouse for the
Southern District of New York, located at 500 Pearl Street, New York, New York 10007, pursuant
to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for a decision and order dismissing certain

claims in the second amended complaint, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that plaintiffs' opposition is due on or before July 17, 2023, and defendants' reply, if any, is due on or before August 14, 2023.

Dated: New York, New York
June 16, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
*Attorney for Defendants City, Adams, de
Blasio, Sewell, Shea, Haber, Gbain,
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Torres, Sanchez, and Morrone*
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By: *Alan H. Scheiner*/s/
Alan H. Scheiner
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (via ECF)