

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

-----X  
KAMRAN HAKIM, 1205-1215 FIRST AVENUE  
ASSOCIATES LLC, and ELLIANA 27 E 92<sup>nd</sup> LLC,

Plaintiffs,

*-against-*

LETITIA JAMES IN HER CAPACITY AS THE  
PUBLIC ADVOCATE, THE OFFICE OF THE PUBLIC  
ADVOCATE FOR THE CITY OF NEW YORK, and  
THE CITY OF NEW YORK,

Defendants.  
-----X

**SUMMONS WITH NOTICE**

VENUE  
New York County

BASIS OF VENUE  
Plaintiff's Place of Business

**TO THE ABOVE NAMED DEFENDANT(S):**

**PLEASE TAKE NOTICE THAT YOUR ARE HEREBY SUMMONED** to appear in this action by serving a notice of appearance on the Plaintiff at the address set forth below, and to do so within TWENTY (20) days after the service of this Summons (not counting the day of service itself), or within THIRTY (30) days after service is complete if the summons is not delivered personally to you within the State of New York.

**YOU ARE HEREBY NOTIFIED THAT** should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

The nature of the actions as against Defendants are: (a) 6301 temporary restraints and a preliminary injunction enjoining Defendants The City of New York (the "City"), and the Office of the Public Advocate for the City of New York (the "Public Advocate" collectively the "Defendants") from the continued publishing of the Public Advocate's landlord watchlist called the "100 Worst Landlords in New York City" on City of New York's official website (nyc.gov) using the URL <http://advocate.nyc.gov/landlord-watchlist/worst-landlords>, and on the website

BORAH,  
GOLDSTEIN,  
LTSCHULER,  
NAHINS &  
GOIDEL, P.C.  
7 BROADWAY  
NEW YORK, NY 10013-3993  
(212) 431-1300

http://landlordwatchlist.com; (b) defamation; (c) libel; (d) *Prima Facie* Tort, (e) deprivation of due process; and (f) exemplary and punitive damages.

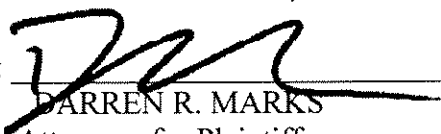
The reliefs being sought are Judgment against defendants, awarding compensation in the amount of at least \$15,000,000.00, in an exact amount to be determined at trial, and punitive damages in an amount to be determined at trial.

Should Defendant(s) fail to appear herein, judgment will be entered by default in an amount no less than \$15,000,000.00 but to be later determined at inquest, legal fees, equitable relief, and such other and further relief to be determined by the Court.

This action will be heard in the Supreme Court of the State of New York, in and for the County of New York. This action is brought in the County of New York, because of Plaintiffs Place of Business.

Dated: New York, New York  
December 20, 2016

**BORAH, GOLDSTEIN, ALTSCHULER,  
NAHINS & GOIDEL, P.C.**

By:   
DARREN R. MARKS  
Attorneys for Plaintiff  
377 Broadway, 6<sup>th</sup> Floor  
New York, New York 10013  
Tel: (212) 431-1300  
\*Fax: (646) 349-4135  
\*Email: dmarks@borahgoldstein.com

TO: Letitia James, the Public Advocate  
1 Centre Street, 15<sup>th</sup> Floor  
New York, New York 10007

The Office of the Public Advocate for  
the City of New York  
1 Centre Street, 15<sup>th</sup> Floor  
New York, New York 10007

*\*Service of documents by electronic means is declined.*

The City of New York  
c/o the New York City Law Department  
100 Church Street  
New York, New York 10007

Letitia James, the Public Advocate  
c/o The New York City Law Department  
100 Church Street  
New York, New York 10007

The Office of the Public Advocate for  
the City of New York  
100 Church Street  
New York, New York 10007

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NAHINS &  
GOIDEL, P.C.  
17 BROADWAY  
NEW YORK, NY 10013-3993  
(212) 431-1300

**ATTORNEY CERTIFICATION**

DARREN R. MARKS, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms the following to be true pursuant to CPLR 2106, and under the penalties of perjury:

I hereby certify that, to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of this Summons with Notice and the contentions herein are not frivolous as defined in section 130-1.1 (c) of the Rules of the Chief Administrator of the Courts.

Date: New York, New York  
December 20, 2016

  
DARREN R. MARKS

BORAH,  
GOLDSTEIN,  
ALTSCHULER,  
NAHINS &  
GOIDEL, P.C.  
77 BROADWAY  
Y, NY 10013-3993  
(212) 431-1300

ATTORNEY'S CERTIFICATION

STATE OF NEW YORK, COUNTY OF

The undersigned, an attorney admitted to practice in the State of New York, does hereby certify, pursuant to Section 2105 CPLR, that I have compared the within

with the original and have found it to be a true and complete copy thereof. 200

Dated:

.....  
Type or Print Name Below Signature

NOTICE OF ENTRY OR SETTLEMENT  
[Check and complete appropriate box and section]

Sir(s) / Madam(s):

PLEASE TAKE NOTICE that a

of which the within is a (true) (certified) copy

NOTICE OF ENTRY  
was duly entered in the within named court on 200

NOTICE OF SETTLEMENT  
will be presented for settlement to the Hon.

one of the judges of the within named court at the Courthouse at

on 200  
at o'clock M.  
Dated: Yours, etc., 200

BORAH, GOLDSTEIN, ALTSCHULER,  
NAHINS & GOIDEL, P.C.

Attorney(s) for  
Office and Post Office Address  
377 BROADWAY  
NEW YORK, NY 10013-3993  
(212) 431-1300  
FAX NUMBER: (212) 334-0960

To:  
Attorney(s) for

Index No.

Year 200

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COUNTY OF NEW YORK

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-against-

Plaintiff,

LETICIA JAMES IN HER CAPACITY AS THE  
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THE CITY OF NEW YORK

Defendants.

ADMISSION OF SERVICE

The undersigned acknowledges receipt, the within

on at o'clock M.

.....  
Attorney(s) for  
by: .....

AFFIDAVIT OF SERVICE BY

STATE OF NEW YORK  
COUNTY OF

I am not a party to this action; I am <sup>been</sup> of age; I reside at

On 200  
the within of  
upon 5

SUMMONS WITH NOTICE

BORAH, GOLDSTEIN, ALTSCHULER,  
NAHINS & GOIDEL, P.C.

Attorney(s) for  
Office and Post Office Address  
377 BROADWAY  
NEW YORK, NY 10013-3993  
(212) 431-1300  
FAX NUMBER: (212) 334-0960

Please refer all communications

DARREN MARKS

To: Esq. 622

Ext.

or: Esq.

Ext.

Sworn to before me  
this day of

.....  
Type or Print Name Below

To:  
Attorney(s) for