

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE HONORABLE OTTO J. REICH and
OTTO REICH ASSOCIATES, LLC,

Plaintiffs,

vs.

LEOPOLDO ALEJANDRO BETANCOURT
LOPEZ, PEDRO JOSE TREBBAU LOPEZ, and
FRANCISCO D'AGOSTINO CASADO,

Defendants.

ECF CASE

13 CV 5307 (PJO)

**NOTICE OF MOTION FOR LEAVE TO FILE A SURREPLY
MEMORANDUM OF LAW IN SUPPORT OF THE RENEWED MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT AND IN RESPONSE TO
PLAINTIFFS' SURREPLY MEMORANDUM**

PLEASE TAKE NOTICE that, upon the Declaration of Julia C. Green, dated February 4, 2015, and upon all prior proceedings herein, Defendant Leopoldo Alejandro Betancourt Lopez, by his attorneys, Lankler Siffert & Wohl LLP, move this Court in the United States District Court for the Southern District of New York located at 40 Foley Square, New York, New York, at a time and date to be set by the Court, for an order permitting him to file a three-page surreply memorandum in response to Plaintiffs' surreply memorandum filed on February 3, 2015.

Betancourt seeks to file a surreply memorandum for the limited purpose of responding to Plaintiffs' false accusation that he misrepresented his travel to New York during the relevant period.

Dated: New York, New York
February 4, 2015

LANKLER SIFFERT & WOHL LLP

By:  

Frank H. Wohl (fwohl@lswlaw.com)

Julia C. Green (jgreen@lswlaw.com)

500 Fifth Avenue, 34th Floor

New York, New York 10110

(212) 921-8399

Attorneys for Defendant Leopoldo Alejandro Betancourt Lopez