

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

Plaintiffs,

v.

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

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Vacate the Court's Interim Sealing Order and Unseal Documents Previously Filed Under Seal, dated March 10, 2015; the Declaration of Mark W. Smith, Esq., with exhibits, dated March 10, 2015; and upon all prior proceedings herein, Plaintiffs the Honorable Otto J. Reich and Otto Reich Associates, LLC ("Plaintiffs"), by their attorneys Smith Valliere PLLC, will move before the Honorable J. Paul Oetken of the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York, at a date and time to be determined by the Court, pursuant to the First Amendment, Fed. R. Civ. P. 7 and this Court's inherent discretion, for an order vacating the Court's Interim Sealing Order, dated November 13, 2014, and unsealing documents previously filed with the Court in connection with and related to Defendants' Renewed Motions to Dismiss Pursuant To FRCP 12(b)(2), and granting Plaintiffs such other and further relief as the Court may deem just and proper.

Dated: New York, New York
March 10, 2015

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By: 

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The Honorable Otto J. Reich and
Otto Reich Associates, LLC*


CERTIFICATE OF SERVICE

I hereby certify this 10th day of March, 2015, that I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification to the following attorneys of record, and is available for viewing and downloading:

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