

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 Pursuant to Fed. R. Civ. P. 15(a)(2) for Leave to File Second Amended Complaint, dated April 27, 2015; the Declaration of Mark W. Smith, Esq., with exhibits, dated April 27, 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 Fed. R. Civ. P. 15(a)(2) for leave to file their Second Amended Complaint in this action, and granting Plaintiffs such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
April 27, 2015

SMITH VALLIERE PLLC

By:   
\_\_\_\_\_

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


**CERTIFICATE OF SERVICE**

I hereby certify this 27th day of April, 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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