

LOFARO & REISER, L.L.P.
55 Hudson Street
Hackensack, New Jersey 07601
Attorneys for Plaintiff

<p>SHAPIRO, CROLAND, REISER, APFEL, & DI IORIO, LLP f/k/a SHAPIRO & CROLAND</p> <p>Plaintiff,</p> <p>v.</p> <p>HERBERT J. LIEBER, HENRIETTA FRIEDMAN, CHAIM STERN, MEYER HALPERN, IMF REALTY TRUST, ELLIOT S. GORDON, and MAURICE GLETZER,</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY BERGEN COUNTY: LAW DIVISION DOCKET NO. BER-L-2653-11 JUDGMENT NO.: J-133919-12</p> <p>Civil Action</p> <p>NOTICE OF MOTION FOR TURNOVER OF FUNDS ON DEPOSIT WITH SUPERIOR COURT OF NEW JERSEY</p>
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TO: Philip E. Mazur, Esq.
Law Offices of Philip E. Mazur
540 Speedwell Ave.
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(Attorneys for Defendants)

Samuel Feldman, Esq.
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(Attorneys for The Middlesex County Improvement Authority)

Superior Court of New Jersey Trust Fund Unit
Attn: Janet C. Richenback, Esq.
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625

COUNSEL:

PLEASE TAKE NOTICE that the undersigned counsel for plaintiff Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP f/k/a Shapiro & Croland (“Plaintiff”), will apply to the Honorable Susan J. Steele, J.S.C., at the Bergen County Courthouse, 10 Main Street, Hackensack, New Jersey on **August 24, 2012 at 9:00 a.m.** or as soon thereafter as counsel may heard, for an Order compelling the turnover of funds on deposit with the Superior Court of New Jersey Trust Fund Unit.

PLEASE TAKE FURTHER NOTICE that in support of its Motion Plaintiff shall rely upon the Certification of Glenn Reiser.

PLEASE TAKE FURTHER NOTICE that no brief is required because the Motion does not raise any complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(a) the Motion will be deemed uncontested and the relief requested may be granted unless opposition papers are filed with the Court and served upon counsel for Plaintiff at least eight (8) days before the return date of the Motion unless the Court relaxes that time.

PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(d) the undersigned requests oral argument in the event that timely opposition is filed and served.

LOFARO & REISER, L.L.P.
Attorneys for Plaintiff

Dated: August ____, 2012

By: _____
Glenn Reiser

CERTIFICATION OF SERVICE

On this date an original and one (1) copy of the within Notice of Motion, Certification of Glenn Reiser, and a proposed form of Order were hand delivered to the Superior Court of New Jersey, Law Division, Bergen County, 10 Main Street, Hackensack, New Jersey, and a copy of same were served upon the following by First Class Mail:

Philip E. Mazur, Esq.
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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Glenn Reiser

Dated: August____, 2012