

NTF S/504

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS HOUSING PART

OK AS TO
FORM
CLERK
DATE 12/03/18
INDEX No. LT-081708-KI-18
INDEX No. LT-081709-KI

622A PRESIDENT STREET OWNERS CORP.,
Petitioner-Landlord,

-against

BRETT WYNKOOP and KATHLEEN KESKE

Respondent-Tenants,

"JOHN DOE" and "JANE DOE"

Respondent(s)-Undertenat(s)

OPPOSITION TO REQUEST FOR WARRANT

CROSSMOTION TO VACATE
ALL PRIOR ORDERS, DECISIONS AND
JUDGEMENTS

CROSSMOTION TO DISMISS
FOR FATAL JURISDICTIONAL DEFECTS

Oral Argument Demanded
Court Reporter Demanded

PLEASE TAKE NOTICE that upon the annexed verified Memorandum of Law of Brett Wynkoop dated 3 December, 2018 and the papers annexed thereto, 622A President Street Owners Corporation **SHOW CAUSE BEFORE THIS COURT**, at the courthouse thereof, located at 14-21 Livingston Place, Brooklyn, New York, 11201 on the 11th day of Dec, 2018, at 2:00 o'clock in the forenoon/afternoon/evening of that date or as soon thereafter as counsel may be heard, why an order should not be made and entered:

1. Vacating all prior orders of the court.
2. Vacating any default that may have been entered after 30 October 2018.
3. Granting a **DISMISSAL OF THE INSTANT ACTION** for lack of jurisdiction.
4. Awarding costs to Respondent per the RPL.
5. Granting such other and further relief as to the court may seem just and equitable including costs for this action.

SUFFICIENT CAUSE THEREFORE APPEARING, it is **ORDERED** that pending the hearing and determination of this petition that the proceedings are otherwise stayed and any warrants of eviction are likewise stayed.

ORDERED that responsive papers if any shall be served upon Petitioner in accordance with Rule 4 days before the return date; and it is further,

ORDERED that service of a copy of this order to show cause and the papers upon which it was made upon all parties by counsel to Remy

personal delivery pursuant to CPLR 2103(b)(3)

office delivery pursuant to CPLR 2103(b)(3)

by electronic mail pursuant to CPLR 308(5)

overnight delivery pursuant to CPLR 2103(b)(6)

on or before 12/4/18, 2018 shall be deemed sufficient service thereof.

Dated: Brooklyn, New York
12/3, 2018

Civil Court City of New York, County of Kings

Hon. Remy Smith
Judge, Housing Court