

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----x

JOSEPH RAKOFKSY, and  
RAKOFKSY LAW FIRM, P.C.,

Plaintiffs,

Index No.: 105573/11

-against-

THE WASHINGTON POST COMPANY  
KEITH L. ALEXANDER  
JENNIFER JENKINS  
CREATIVE LOAFING MEDIA  
WASHINGTON CITY PAPER  
REED SMITH  
BREAKING MEDIA, LLC  
ABOVETHELAW.COM  
ELIE MYSTAL  
AMERICAN BAR ASSOCIATION  
ABAJOURNAL.COM  
DEBRA CASSENS WEISS  
SARAH RANDAG  
MYSHINGLE.COM  
CAROLYN ELEFANT  
SIMPLE JUSTICE NY, LLC  
BLOG. SIMPLE JUSTICE.US  
KARVET & VOGEL,  
SCOTT H. GREENFIELD  
LAW OFFICE OF ERIC L. MEYER  
ERIC L. MAYER, *individually*  
GAMSO, HELMICK & HOOLAHAN  
JEFF GAMSO, *individually*  
CRIMEANDFEDERALISM.COM  
"JOHN DOE #1"  
ORLANDO-ACCIDENT LAWYER.COM  
"JOHN DOE #2"  
LAW OFFICE OF FARAJI A. ROSENTHALL  
FRAHJI A. ROSENTHALL, *individually*  
BENNETT AND BENNETT  
MARK BENNETT, *individually*  
SEDDIQ LAW  
MIRRIAM SEDDIQ, *individually*  
THE MARTHA SPERRY DAILY  
ADVANTAGE ADVOCATES  
MARTHA SPERRY; *individually*  
ALLBRITTON COMMUNICATIONS

NOTICE OF MOTION TO  
DISMISS COMPLAINT AS  
AGAINST DEFENDANT  
DOUDNA FOR LACK OF  
PERSONAL  
JURISDICTION

COMPANY  
TBD.COM  
RESTORINGDIGMTYTOTHELAW.BLOGSPOT.  
COM  
"J.DOG84@YMAIL.COM"  
ADRIAN K. BEAN  
HESLEP & ASSOCIATES  
KOEHLER LAW  
JAMISON KOEHLER, *individually*  
THE TURKEWITZ LAW FIRM  
ERIC TURKEWITZ, *individually*  
THE BEASLEY FIRM, LLC  
MAXWELL S. KENNERLY  
STEINBERG MORTON HOPE & ISRAEL, LLP  
ANTONIN I. PRIBETIC  
PALMIERI LAW  
LORI D. PALMIERI, *individually*  
TANNEBAUM WEISS, PL  
BRIAN TANNEBAUM, *individually*  
WALLACE, BROWN & SCHWARTZ  
GEORGE M. WALLACE, *individually*  
DAVID C. WELLS, P.C. and  
DAVID C. WELLS, *individually*  
ROB MCKINNEY, ATTORNEY-AT-LAW  
ROB MCKINNEY, *individually*  
THOMSON REUTERS  
DAN SLATER  
BANNED VENTURES, LLC  
BANNINAYION.COM  
"TARRANT84"  
UNIVERSITY OF ST. THOMAS SCHOOL OF  
LAW  
DEBORAH K. HACKERSON  
LAW OFFICES OF MICHAEL T. DOUDNA  
MICHAEL T. DOUDNA, *individually*  
MACE J. YAMPOLSKY & ASSOCIATES  
MACE J. YAMPOLSKY, *individually*  
THE LAW OFFICE OF JEANNE O'HALLERAN,  
LLC  
JEANNE O'HALLERAN, *individually*  
REITER & SCHILLER, PA.  
LEAH K. WEAVER  
AVVO CORPORATION  
JOSHUA KING  
ACCELA, INC.  
COLIN SAMUELS

THE BURNEY LAW FIRM, LLC and  
NATHANIEL BURNEY, *individually*,

Defendants.

-----x

PLEASE TAKE NOTICE, that upon the affirmation of Thomas A. Catalano, dated June 23, 2011, the affidavit of Michael T. Doudna, sworn to June 20, 2011, the affidavit of Harmony Kenney, June 21, 2011, all with annexed exhibits, the amended complaint filed May 16, 2011, and the proceedings had heretofore herein, the defendants Law Offices of Michael T. Doudna and Michael T. Doudna, individually, will move this court in the IAS Motion Support Office, Room 130, at the New York County Courthouse, located at 60 Centre Street, New York, New York, on July 15, 2011, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order pursuant to:

a) C.P.L.R. 3211(a)(8) dismissing the amended complaint on the grounds that the court does not have jurisdiction of the person of the defendants Law Offices of Michael T. Doudna and Michael T. Doudna, individually;

b) C.P.L.R. 8303-a and/or 22 NYCRR § 130-1.1(a) awarding sanctions against plaintiffs and their attorneys for the attorneys' fees and costs incurred by moving defendants to date, on the grounds that the complaint as to them was commenced in bad faith and is frivolous, and setting this matter down for a hearing to determine the amount of sanctions, and

c) For such and further relief as this Court deems just and proper.

This is an action for defamation, intentional infliction of emotional distress, interference with contractual relations, and violation of the right to privacy.

PLEASE TAKE FURTHER NOTICE, that pursuant to C.P.L.R. 2214(b) answering affidavits, if any, are required to be served within seven (7) days prior to the return date of this motion.

Dated: New York, New York  
June 24, 2011

LESTER SCHWAB KATZ & DWYER, LLP

---

Thomas A. Catalano  
Attorneys for Defendants Law Offices of Michael T.  
Doudna and Michael T. Doudna, individually,  
120 Broadway – 38<sup>th</sup> Floor  
New York, New York 10271  
(212) 964-6611

TO:  
Joseph Rakofky, Esq.  
4400 US-9  
Freehold, New Jersey 07728  
Plaintiff *pro se*

Richard Borzouye, Esq.  
Borzouze Law Firm, P.C.  
14 Wall Street, 20<sup>th</sup> Floor  
New York, New York 10005  
Attorneys for plaintiffs

Erik M. Turkewitz, Esq.  
THE TURKEWITZ LAW FIRM  
228 East 45<sup>th</sup> Street, 17<sup>th</sup> Floor  
New York, New York 10017

Defendants *pro se* and for SCOTT H. GREENFIELD, SIMPLE JUSTICE NY, LLC, BLOG. SIMPLE JUSTICE.US, KARVET & VOGEL, MYSHINGLE.COM, CAROLYN ELEFANT BENNETT AND BENNETT, MARK BENNETT, *individually*, LAW OFFICE OF ERIC L. MEYER, ERIC L. MAYER, *individually*, THE BURNEY LAW FIRM, LLC, NATHANIEL BURNEY, *individually*, AVVO CORPORATION, JOSHUA KING, GAMSO, HELMICK & HOOLAHAN, JEFF GAMSO, *individually*, WALLACE, BROWN & SCHWARTZ GEORGE M. WALLACE, *individually*, BANNED VENTURES, LLC, BANNINAYION.COM "TARRANT84", TANNEBAUM WEISS, PL, BRIAN TANNEBAUM, *individually*, ACCELA, INC., COLIN SAMUELS, CRIMEANDFEDERALISM.COM, "JOHN DOE #1", STEINBERG MORTON HOPE & ISRAEL, LLP, ANTONIN I. PRIBETIC, BREAKING MEDIA, LLC, ABOVEHELAW.COM, ELIE MYSTAL, BREAKING MEDIA, LLC ABOVEHELAW.COM, DAVID C. WELLS, P.C. and DAVID C. WELLS, *individually*

John H Teschner, Esq.  
132 Nassau Street, Suite 900  
New York, New York 10038  
Attorneys for defendants  
MACE J. YAMPOLSKY & ASSOCIATES  
MACE J. YAMPOLSKY, *individually*  
on behalf of other defendants

David Brickman, Esq.  
1664 Western Avenue  
Albany, New York 12203  
Attorneys for defendants Maxwell S. Kennerly,  
The Beasley Firm, LLC, Koehler Law, Jamison Koehler,  
and Mirriam Seddig

Mark A. Weisman, Esq.  
Herzfeld & Rubin, P.C.  
125 Broad Street  
New York, New York 1004  
Attorneys for defendants Reuters America, LLC  
and Dan Slater

No appearance to date:  
THE WASHINGTON POST COMPANY, KEITH L. ALEXANDER, JENNIFER JENKINS,  
CREATIVE LOAFING MEDIA, WASHINGTON CITY PAPER, REED SMITH, AMERICAN  
BAR ASSOCIATION, ABAJOURNAL.COM, DEBRA CASSENS WEISS, SARAH  
RANDAG, ORLANDO-ACCIDENT LAWYER.COM, "JOHN DOE #2", LAW OFFICE OF  
FARAJI A. ROSENTHALL, FRAHJI A. ROSENTHALL, *individually*, THE MARTHA  
SPERRY DAILY, ADVANTAGE ADVOCATES, MARTHA SPERRY; *individually*,  
ALLBRITTON COMMUNICATIONS COMPANY, TBD.COM,  
RESTORINGDIGMTYTOTHELAW.BLOGSPOT.COM, J.DOG84@YMAIL.COM, ADRIAN  
K. BEAN, HESLEP & ASSOCIATES, PALMIERI LAW, LORI D. PALMIERI, *individually*,  
ROB MCKINNEY, ATTORNEY-AT-LAW, ROB MCKINNEY, *individually*, UNIVERSITY  
OF ST. THOMAS SCHOOL OF LAW, DEBORAH K. HACKERSON, THE LAW OFFICE OF  
JEANNE O'HALLERAN, LLC, JEANNE O'HALLERAN, *individually*, REITER &  
SCHILLER, PA., LEAH K. WEAVER