

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

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

Plaintiffs,

Notice of Motion

-against-

THE WASHINGTON POST COMPANY, et al.,

Index # 105573/11

Defendants.
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PLEASE TAKE NOTICE, that upon the accompanying Petition of Marc John Randazza dated the 2nd day of June, 2011, and the exhibits annexed thereto, and the Affidavit of Eric Turkewitz, dated the 3rd day of June, 2011, and the exhibits annexed thereto, and all of the prior pleadings and proceedings heretofore had herein, the undersigned will move this court on behalf the following 33 out of the 81 defendants:

- (1) Eric Turkewitz, (2) The Turkewitz Law Firm, (3) Scott Greenfield, (4) Simple Justice NY, LLC, (5) blog.simplejustice.us, (6) Kravet & Vogel, LLP, (7) Carolyn Elefant, (8) MyShingle.com, (9) Mark Bennett, (10) Bennett And Bennett, (11) Eric L. Mayer, (12) Eric L. Mayer, Attorney-at-Law, (13) Nathaniel Burney, (14) The Burney Law Firm, LLC, (15) Josh King, (16) Avvo, Inc., (17) Jeff Gamso, (18) George M. Wallace, (19) Wallace, Brown & Schwartz, (20) "Tarrant84", (21) Banned Ventures, (22) Banni, (23) Brian L. Tannebaum, (24) Tannebaum Weiss, (25) Colin Samuels, (26) Accela, Inc., (27) Crime and Federalism, (28) John Doe #1, (29) Antonin I. Pribetic, (30) Steinberg Morton, (31) Elie Mystel, (32) AboveTheLaw.com, and (33) Breaking Media, LLC,

before the Justice presiding at the Supreme Court, County of New York, 60 Centre Street, New York, NY on the 20th day of June, 2011, at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel may be heard, for an order:

a. Admitting Marc John Randazza *pro hac vice* to defend this case on behalf of 30 of the 81 named defendants;

b. For an extension of time for all defendants to answer or move with respect to the complaint, so that the defendants have a unified date to move or answer. This is to (hopefully) organize the oncoming blizzard of paper, by starting the action with unified time schedules;

c. Directing that the plaintiffs serve a copy of the order on all defendants.

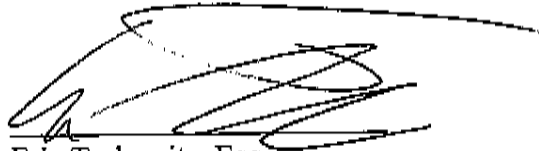
d. For such other further and different relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR 2214(b), answering affidavits, affirmations or notices of cross-motions, with any supporting papers shall be served at least seven days before the time this motion is noticed to be heard.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR 2215, if such answering affidavit, affirmation or notice are served by mailing as provided by CPLR 2103(b)(2) they shall be served at least three days earlier than as prescribed in CPLR 2215; and if served by overnight delivery as per CPLR 2203(6)(2), they shall be served one day earlier than as prescribed in Rule 2215.

Dated: New York, New York
June 3, 2011

Yours, etc.



Eric Turkewitz, Esq.
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Pro se and as counsel to the
30 defendants listed above
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To:

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