

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**MICHAEL B. JOHNSON,  
on behalf of himself and on behalf of those  
similarly situated plaintiffs,**

**Plaintiffs,**

**vs.**

**PUSHPIN HOLDINGS, LLC, JAY  
COHEN, LEONARD MEZEI, ARI R.  
MADOFF, ALISHA ROSS, LOUISA  
TATBAK, SHAUN REDWOOD, GCN  
HOLDING, LLC, and CIT FINANCIAL  
USA, INC.,**

**Defendants.**

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**Case No. 2013 CV 07468 (CPK) (YPK)**

**NOTICE OF MOTION**

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on **August 18, 2015 at 9:30 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Charles P. Kocoras in the courtroom usually occupied by him in Room 2325 of the U.S. District Court for the Northern District of Illinois and present **Motion for Entry of Separate Judgment Pursuant to Fed.R.Civ.P. 58**, a copy of which is attached hereto and hereby served upon you.

Dated: August 11, 2015

Respectfully submitted,

By: /s/ Jason B. Hirsh

Jason B. Hirsh (ARDC # 6283094)

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*pro hav vice* admission pending

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I, Jason B. Hirsh, an attorney, hereby certify that on August 11, 2015, I electronically filed this **Notice of Motion** and **Motion for Entry of Separate Judgment Pursuant to Fed.R.Civ.P. 58** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

Howard B. Prossnitz, Esq.  
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/s/ Jason Hirsh  
JASON B. HIRSH