

GJR/da  
82-82153

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

THE CITY OF NEW YORK, DEPUTY CHIEF  
MICHAEL MARINO, Tax Id. 873220, Individually  
and in his Official Capacity, ASSISTANT CHIEF  
PATROL BOROUGH BROOKLYN NORTH  
GERALD NELSON, Tax Id. 912370, Individually and  
in his Official Capacity, DEPUTY INSPECTOR  
STEVEN MAURIELLO, Tax Id. 895117, Individually  
and in his Official Capacity CAPTAIN THEODORE  
LAUTERBORN, Tax Id. 897840, Individually and in  
his Official Capacity, LIEUTENANT JOSEPH GOFF,  
Tax Id. 894025, Individually and in his Official  
Capacity, SGT. FREDERICK SAWYER, Shield No.  
2576, Individually and in his Official Capacity,  
SERGEANT KURT DUNCAN, Shield No. 2483,  
Individually and in his Official Capacity,  
LIEUTENANT CHRISTOPHER BROSCART, Tax  
Id. 915354, Individually and in his Official Capacity,  
LIEUTENANT TIMOTHY CAUGHEY, Tax Id.  
885374, Individually and in his Official Capacity,  
SERGEANT SHANTEL JAMES, Shield No. 3004,  
AND P.O.'s "JOHN DOE" #1-50, Individually and in  
their Official Capacity (the name John Doe being  
fictitious, as the true names are presently unknown)  
(collectively referred to as "NYPD defendants"),  
JAMAICA HOSPITAL MEDICAL CENTER, DR.  
ISAK ISAKOV, Individually and in his Official  
Capacity, DR. LILIAN ALDANA-BERNIER,  
Individually and in her Official Capacity and  
JAMAICA HOSPITAL MEDICAL CENTER  
EMPLOYEE'S "JOHN DOE" # 1-50, Individually and  
in their Official Capacity (the name John Doe being  
fictitious, as the true names are presently unknown),

Defendants.

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**AMENDED**  
**NOTICE OF MOTION**

Civil Action No.:  
10 CIV 6005 (RWS)

**PLEASE TAKE NOTICE**, that upon the Declaration of Gregory J. Radomisli dated  
December 22, 2014 and filed on January 5, 2015, the Exhibits attached thereto, the annexed

Amended Declaration of Gregory J. Radomisli, Esq., the Exhibit annexed thereto, the Amended Rule 56.1 Statement, the accompanying Amended Memorandum of Law, and upon all prior pleadings and proceedings heretofore had herein, defendant JAMAICA HOSPITAL MEDICAL CENTER, by its attorneys, MARTIN CLEARWATER & BELL LLP, will move this Court at 500 Pearl Street, New York, New York on the 11th day of February, 2015 at 12:00 p.m. or as soon thereafter as counsel can be heard, for an Order:


- 1) Pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment to the movant, dismissing the Third Amended Complaint with prejudice, amending the caption to delete JAMAICA HOSPITAL MEDICAL CENTER therefrom; and
- 2) Such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, are to be served no later than February 4, 2015, by Order of the Court.

Dated: New York, New York  
January 30, 2015

Yours, etc.,

MARTIN CLEARWATER & BELL LLP

By:   
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