UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

------X ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

10CV6005(RSW)

NOTICE OF MOTION IN LIMINE

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 BROSCHART, 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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PLEASE TAKE NOTICE, that upon the annexed Declaration of Brian E. Lee, the , the accompanying Memorandum of Law, and the exhibits attached hereto, defendant ISAK

ISAKOV, M.D., by his attorneys, IVONE, DEVINE & JENSEN, LLP, will move this Court before the Hon. Robert W. Sweet, at 500 Pearl Street, New York, New York on October 2, 2015, at 12:00 noon, or as soon thereafter as counsel can be heard, for an Order to preclude Dr. Roy Lubit from testifying that plaintiff suffers from Post-Traumatic Stress Disorder (PTSD), and for such other and further releif as may be just and proper.

Dated: Lake Success, New York September 21, 2015

Yours, etc.,

IVONE, DEVINE & JENSEN, LLP

/s/ Brian E. Lee

By:

BRIAN E. LEE (9495) Attorneys for Defendant ISAK ISAKOV, M.D. 2001 Marcus Avenue, Suite N100 Lake Success, New York 11042 (516) 326-2400

## TO:

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SCOPPETTA SEIFF KRETZ & ABERCROMBIE Attorneys for Defendant STEVEN MAURIELLO 444 Madison Avenue, 30<sup>th</sup> Floor New York, NY 10022 (212) 371-4500 Attn: Walter Kretz, Jr., Esq.

CALLAN, KOSTER, BRADY & BRENNAN, LLP Attorneys for Defendant DR. LILIAN ALDANA-BERNIER 1 Whitehall Street New York, NY 10004-2140 (212) 248-0115

MARTIN, CLEARWATER & BELL, LLP Attorneys for Defendant JAMAICA HOSPITAL MEDICAL CENTER 220 East 42<sup>nd</sup> Street New York, NY 10017-5842 (212) 697-3122 Attn: Gregory Radomisli, Esq.

Attn: Paul Callan, Esq.