

OUR FILE NO.: 090.155440

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

- against -

10CV6005 (RWS)

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, STG. 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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PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, defendant

DR. LILIAN ALDANA-BERNIER, by her attorneys, CALLAN, KOSTER, BRADY & NAGLER, LLP, will move this Court before the Hon. Robert W. Sweet, at 500 Pearl Street, New York, New York on October 9, 2015, at 12:00 pm, 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 relief as may be just and proper.

WHEREFORE, it is respectfully requested that the instant Motion be granted in its entirety.

Dated: New York, New York
September 21, 2015

/s/ Matthew J. Koster
Matthew J. Koster

NATHANIEL SMITH, ESQ.
111 Broadway, Suite 1305
New York, New York 10006

GREGORY J. RAMDOMISLI, ESQ.
MARTIN, CLEARWATER & BELL, LLP
Attorneys for Defendant
JAMAICA HOSPITAL MEDICAL CENTER
220 East 42nd Street
New York, New York 10017-5842

BRIAN E. LEE, ESQ.
IVONE, DEVINE & JENSEN, LLP
Attorneys for Defendant
ISAK ISAKOV
2001 Marcus Avenue, Suite N100
Lake Success, New York 11042

ALAN SCHNEIR, ESQ.
CORPORATION COUNSEL FOR THE CITY OF NEW YORK
Attorneys for Defendants
CITY OF NEW YORK et al
100 Church Street, Room 3-203
New York, New York 10007

WALTER A. KRETZ, JR., ESQ.
SCOPPETTA SEIFF KRETZ & ABERCROMBIE
Attorneys for Defendant
DEPUTY INSPECTOR STEVEN MAURIELLO
444 Madison Avenue, 30th Floor
New York, New York 10022