

B. Shamus O'Donniley, Esq., PLLC
777 Brickell Avenue
Suite 500-9678
Miami, Florida 33131
☎ +1(718) 310-3051
shamus@lawyer.com

September 27, 2023

Via ECF, Email, and United States Postal Service First Class Mail

To: Hon. Loretta A. Preska, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 1007

Re: *Manta Industries, Ltd. v. Paul P. Law, et al.*, Case No. 16-cv-8308

Re: Status of the Action, Remaining Claims, and Defendants

Dear Judge Preska:

I represent Plaintiff Manta Industries, Ltd. This is a fraudulent transfer case. Plaintiff alleges defendants fraudulently transferred hundreds of thousands of dollars of cash to themselves after a multi-million dollar judgment was entered by this Court against several of their business entities.

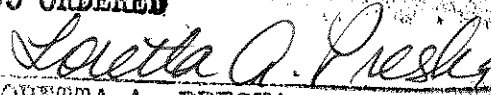
Now there is a pending Rule 37 motion filed by plaintiff against one family group of defendants: Yogesh Monhan Anand, his wife, Kum S. Casanova, and his son, Jonathan Anand. The basis for the motion is a total failure to respond to any discovery. Now, plaintiff requests this Court's permission to file another Rule 37 motion against the remaining family group of defendants: Paul Law and his wife, Lourdes Law. They, too, have totally failed to respond to discovery requests. This Court has entered multiple orders directing the Laws to respond to discovery requests and, in one order, Mr. Law was told to appear for a deposition and answer questions. So far, the Laws have produced no documents. Moreover, Mr. Law did not show up for his court ordered deposition.

If the Court allows the second Rule 37 motion, plaintiff will request that all the defendants' answers be stricken, and that default be entered against all of them on the issue of liability, leaving the issues of damages against all defendants to be decided at an evidentiary hearing.

I propose the following Local Civil Rule 6.1 briefing schedule:

- Plaintiff's Rule 37 motion shall be filed on or before October 17, 2023.
- Defendants' responses shall be filed within seven days after Plaintiff's motion is filed.
- Plaintiff's reply shall be filed within two days after Plaintiff's responses are filed.

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

Yours truly,

/s/B. Shamus O'Donniley

9/28/23

Cc:

Kum Sun Casanova
853 Lancaster Lane
Newport News, VA 23602
kcasanova@earthlink.net

Jonathan Mohan Anand
4000 Radius Way
Unit 4211
Newport News, VA 23602
jonathananand@gmail.com

Yogesh Mohan Anand
405 Green Tree CV
Newport News, VA 23606
yogेश@sbcglobal.net
yogianand212@gmail.com

Paul P. Law
6 Juniper Court
Woodridge, NY 12733
nflaw@aol.com
pplaw@aol.com

Paul P. Law
29 69A Vanderveer Street
Queens Village, NY 11427
nflaw@aol.com
pplaw@aol.com

Chi-Yuan Hwang, Esq.
39-01 Main Street
Suite 510
Flushing, NY 11354
cyhlawoffice@gmail.com
cyhwang2010@gmail.com
cy@hwang-lawoffice.com

Chi-Yuan Hwang, Esq.
13620 38th Ave., Suite 91
Flushing, NY 11354-4263
cyhlawoffice@gmail.com
cyhwang2010@gmail.com
cy@hwang-lawoffice.com

Chi-Yuan Hwang, Esq.
41 Woodcock Lane
Levittown, NY 11756
cyhlawoffice@gmail.com
cyhwang2010@gmail.com
cy@hwang-lawoffice.com

Lourdes W. Law
6 Juniper Court
Woodridge, NY 12733

Lourdes W. Law
29 69A Vanderveer Street
Queens Village, NY 11427