

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Denise L. Cote
Denise L. Cote
6/11/21

-----X
NORMA KNOPF, individually and as
a Distributee and the Executor Named
in Michael Knopf's Last Will,

Plaintiff,

Case No. 17 Civ. 5833 (DLC) (SN)

- against -

Hon. Denise L. Cote, U.S.D.J.

FRANK M. ESPOSITO,
DORSEY & WHITNEY, LLP,
NATHANIEL H. AKERMAN,
and EDWARD S. FELDMAN,

Defendants.

NOTICE OF MOTION

-----X
PLEASE TAKE NOTICE that, upon the annexed Declaration of Eric W. Berry and
accompanying Memorandum of Law, both dated June 9, 2021, plaintiff Norma Knopf will move
before this Court, the Hon. Denise L. Cote, U.S.D.J., presiding, at the Sen. Daniel Patrick
Moynihan Courthouse, 500 Pearl Street, Courtroom 15B, New York, New York 10007, at a date
and time to be determined by the Court, for an order

(1) pursuant to Local Rule 6.3 and Federal Rules of Civil Procedure 59(e),
54(b) and 60(b)(1) granting reconsideration of the portion of the Court's May 26,
2021 decision (ECF-450) ("the Decision") that imposed a cap on Mrs. Knopfs'
possible damages; and

(2) upon reconsideration, increasing the cap on Mrs. Knopfs' possible
damages by the \$650,000 amount by which the Decision reduced those damages
for reasons relating to a January 6, 2015 mortgage granted by Pursuit Holdings,
LLC in favor of Meister Seelig & Fein, LLP.

Dated: New York, New York
June 9, 2021

Berry Law PLLC
/s/ Eric W. Berry

By: _____
Eric W. Berry [EB8598]
745 Fifth Avenue, 5th Floor
New York, New York 10151
(212) 355-0777

/s/Gary Greenberg

Gary Greenberg, Esq.
666 Third Avenue, 10th Floor
New York, New York 10017
(212) 765-5770

To: all counsel and *pro se* parties (by the ECF system)