UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOINT STOCK COMPANY "CHANNEL ONE RUSSIA WORLDWIDE,"

Plaintiff,

Defendants.

v.

RUSSIAN TV COMPANY, INC., SR EXPRESS CONSULTING INC. d/b/a TECHSTUDIO, STEVEN RUDIK, SERVERNAYA INC., ESTIDESIGN INC. and JOHN DOES 1-10, Case No. 18-cv-2318 (LGS)

NOTICE OF MOTION TO STAY ENTRY OF JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in support hereof, and upon all other prior pleadings and proceedings had herein, Defendants Russian TV Company, Inc., SR Express Consulting Inc. d/b/a Techstudio, Steven Rudik, Servernaya Inc., and ESTIDesign Inc. will move in this Court, at a date and time to be determined by the Court, for an order granting their motion, under the Court's April 20, 2023, Order (Dkt. No. 345), for a stay of entry of Judgment.

PLEASE TAKE FURTHER NOTICE that, under the Court's April 20, 2023, Order, Plaintiff's response shall be submitted no later than May 18, 2023, and Defendants' reply shall be submitted no later than May 25, 2023.

By **December 6, 2023**, the parties shall each file a letter explaining any legal bases for why the Court should not enter judgment and stay execution of such judgment until Plaintiff either is no longer subject to sanctions under Executive Order 14024 or is granted a license by the Office of Foreign Assets Control, to minimize delay in the start of any appellate process. So Ordered.

Dated: November 29, 2023 New York, New York

LORŃA G. SCHOFIELÓ United States District Judge

Dated: May 4, 2023 New York, New York

GROSSMAN LLP

By: Jude & Mossimon

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