UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK ------X UPSOLVE, INC. and REV. JOHN UDO-OKON,

Plaintiffs.

v.

Case No. 22-cv-00627 (PAC)

LETITIA JAMES, in her official capacity as The Attorney General of the State of New York,

## NOTICE OF MOTION

Defendant.	
X	

PLEASE TAKE NOTICE that upon the Declaration of David Udell, dated March 1, 2022, and the accompanying Memorandum of Law, dated March 1, 2022, in support of this motion, non-party the National Center for Access to Justice ("NCAJ") will move before the Honorable Paul A. Crotty at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order granting leave for NCAJ to file a brief *amicus curiae* in support of the motion for preliminary injunction filed by Plaintiffs herein, together with such other and further relief as the Court deems just and proper.

Dated: New York, New York March 1, 2022

<u> /s David Udell</u>

David S. Udell
Executive Director
National Center for Access to Justice
150 West 62<sup>nd</sup> Street, Rm 7165
New York, NY 10023
917-445-3021
dudell@fordham.edu

Counsel for Proposed Amicus Curiae National Center for Access to Justice