

LOFARO & REISER, L.L.P.
55 Hudson Street
Hackensack, New Jersey 07601
(201) 498-0400
Attorneys for Defendant, Diane Palughi

GORALSKI, INC.,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: BERGEN COUNTY
Plaintiff,	:	
	:	DOCKET NO.: BER-L-89-01
Vs.	:	
	:	Civil Action
BETSY ROSS MANUFACTURING CO.,	:	
<i>et al.</i> ,	:	
	:	
Defendants.	:	

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**NOTICE OF MOTION OF DEFENDANT, DIANE PALUGHI, FOR
SUMMARY JUDGMENT DISMISSING PLAINTIFF'S AMENDED COMPLAINT**

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To: Robert S. Princiotto, Esq.
Marcus and Levy
80 Broadway
Elmwood Park, New Jersey 07407
(Attorneys for Plaintiff)

Maria Maccone, Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, New Jersey 07068
(Attorneys for Defendant, National Flag & Display Co.)

COUNSEL:

PLEASE TAKE NOTICE that defendant, Diane Palughi, will move before the Superior Court of New Jersey at the Bergen County Justice Center, 10 Main Street, Hackensack, New Jersey, on Friday, March 22, 2002 at 9:00 a.m. or as soon thereafter as counsel may be heard, for an Order granting summary judgment dismissing plaintiff's Amended Complaint, pursuant to Rules 4:46-1 and 4:46-2.

PLEASE TAKE FURTHER NOTICE that defendant will rely upon the Certification of Diane Palughi, Certification of Glenn R. Reiser, Affidavit of Stephen B. Ravin, Statement of Material Facts, and Memorandum of Law. A proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that defendant requests oral argument.

PLEASE TAKE FURTHER NOTICE that opposing affidavits, certifications, briefs, and cross-motions for summary judgment, if any, shall be served and filed not later than 10 days before the return date of this motion in accordance with R. 4:46-1.

LOFARO & REISER, L.L.P.
Attorneys for Defendant, Diane Palughi

By: _____
Glenn R. Reiser

Dated: February ____, 2002

CERTIFICATION OF FILING AND PROOF OF SERVICE

On this date, the undersigned caused to be hand delivered an original and two (2) copies of the within Notice of Motion, Certification of Glenn Reiser, and proposed form of Order to the Bergen County Clerk, Room 119, Bergen County Justice Center, Hackensack, New Jersey 07601.

On this date, the undersigned also served the above motion papers via First Class Mail upon the following:

Robert S. Princiotta, Esq.
Marcus and Levy
80 Broadway
Elmwood Park, New Jersey 07407
(Attorneys for Plaintiff)

Maria Maccone, Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, New Jersey 07068
(Attorneys for Defendant, National Flag & Display Co.)

I hereby certify that the foregoing statements made by me are true. I am fully aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Glenn R. Reiser

Dated: February _____, 2002