

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

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L&K DENTAL P.A., and DONG HYUN LEE,

Plaintiffs,

vs.

RECEIVABLE MANAGEMENT SERVICE  
a/k/a GLOBAL COLLECTION COMPANY;  
TRANSNATIONAL COMMUNICATIONS  
INTERNATIONAL; and RDS SOLUTIONS,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO: BER-L-9555-09

CIVIL ACTION

**NOTICE OF MOTION  
FOR SANCTIONS**

Trial Date: February 7, 2011

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**TO:** Michael Kimm, Esq.  
Attn: Francis Liu, Esq.  
Kimm Law Firm  
41 West Bencker Street  
Englewood, New Jersey 07631  
(Attorney for Plaintiffs)

Rocco T. Casale, Esq.  
Stevens & Schwab  
100 Connell Drive  
First Floor – Suite 100  
Berkeley Heights, New Jersey 07922  
(Attorneys for Defendant, Receivable Management Service)

Colleen A. McCarthy, Esq.  
Four Pottersville Road  
Far Hills, NJ 07931  
(Attorneys for RDS Solutions)

**COUNSEL:**

**PLEASE TAKE NOTICE** that on the trial date of February 7, 2011, or as soon thereafter as counsel may be heard, but in no event later than the next regularly scheduled motion

date of February 18, 2011, defendant, Transnational Communications International, shall move before the Superior Court of New Jersey, Law Division, Bergen County, located at the Bergen County Justice Complex, 10 Main Street, Hackensack, New Jersey 07601, for the entry of an Order granting sanctions against plaintiffs and their counsel pursuant to R. 1:4-8.

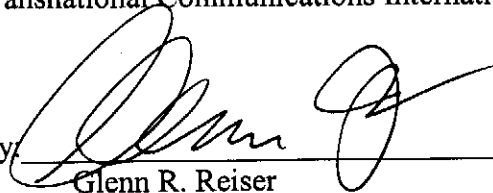
**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, defendant shall rely on the Certification of Services, and Letter Brief.

**PLEASE TAKE FURTHER NOTICE** that the motion will be deemed uncontested and the relief requested may be granted unless written opposition papers are filed with the Court and served upon counsel for defendant within seven (7) days prior to the return date of the motion, or within such other time period established in the exercise of the Court's discretion.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

LOFARO & REISER, L.L.P.  
Attorneys for Defendant,  
Transnational Communications International

By

  
\_\_\_\_\_  
Glenn R. Reiser

Dated: January 28, 2011

**CERTIFICATION OF FILING AND PROOF OF SERVICE**

On this date, the undersigned hand delivered an original and two (2) copies of the within Notice of Motion, Certification of Services, Letter Brief, and proposed form of Order to the Bergen County Clerk, Law Division, Bergen County Justice Complex, 10 Main Street, Hackensack, New Jersey 07601.

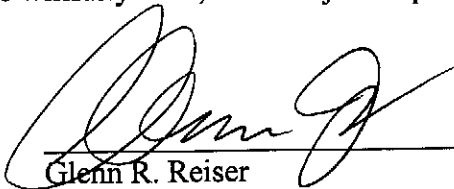
On this date, the undersigned also caused a complete set of the above motion pleadings to be sent by E-Mail and Regular Mail to:

Michael Kimm, Esq.  
Attn: Francis Liu, Esq.  
Kimm Law Firm  
41 West Bencker Street  
Englewood, New Jersey 07631  
Attorney for Plaintiffs

Rocco T. Casale, Esq.  
Stevens & Schwab  
100 Connell Drive  
First Floor – Suite 100  
Berkeley Heights, New Jersey 07922  
(Attorneys for Defendant, Receivable Management Service)

Colleen A. McCarthy, Esq.  
Four Pottersville Road  
Far Hills, New Jersey 07931  
(Attorneys for Defendant, RDS Solutions)

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.

  
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Glenn R. Reiser

Dated: January 28, 2010