

I. NOTICE AND ADMISSION OF SERVICE

BARIS DINCER

August 2, 2020

PLAINTIFFS: SULLIVAN PROPERTIES, L.P

TO: <SLASKOWITZ@INGRAMLLP.COM>
c/o **Ingram Yuzek Gainen Carroll & Bertolotti LLP**
ATTN: Ms. Shari Laskowitz
150 East 42nd St, FL 19
New York, New York 10017

CC: <CWEISS@INGRAMLLP.COM>
ATTN: Mr. Cory Weiss
150 East 42nd Street, FL 19
New York, New York 10017

<LEGAL@MANHATTANSKYLINE.COM>
c/o **MANHATTAN SKYLINE**
ATTN: Mr. Paul Regan
103 WEST 55TH STREET
New York, NY 10019

Ms. Laskowitz,

As you are aware, I reside at 111 Sullivan Street, apartment 2BR in the County of New York located South of Prince Street and North of Spring Street (herein the “**RESIDENCE**”) which I have occupied since January 1st, 2020.

Please be advised that a Cross Motion is being filed in the County of New York’s Supreme Court through NYCEF, as referenced in your letter dated June 5th, 2020 - you have acknowledged and affirmed that all parties have recorded their participation in e-filing and that electronic filing of any document with NYSCEF serves that document upon all participating parties [Uniform Rule § 202.5-b(f)(2)] and is considered “Good Service”.

All artifacts entered in this matter will continue to be filed and accessible to you, and any further information will be provided as required. Please also be advised this notice serves

as notice to Motion for restraint of yourself, the “Plaintiff”, its affiliates, representatives, service providers, (herein “**MANHATTAN SKYLINE**”) from any further intrusion of my life.

The damages and harm I have sustained are inconsequential while considering the restraints which need be adjudicated and egregiously to prevent **MANHATTAN SKYLINE** from causing any further damages, interruption, and intrusion to the lives of its other tenants. There is a clear and present danger as referenced most recently in cases decided on April¹ and in February². Plaintiff is attempting an acrobatic traverse, as furthered in the supplements which ensue, and enjoy the invasion of my privacy, time, and without consideration of my health and will continue to violate³ a “trivial” violation and breach of my privacy, including violations of “unlawful conduct” and “unfair business practices” which are furthered in violations of a Rent Stabilized Lease.

I must implore, at a bare minimum maintain, properly introduce the material Parties to this matter, inclusive of Mr. Zucker and myself. There is a preponderance of evidence which has been submitted in your claims, and in happenstance this has rooted the annexed Cross Motion, Exhibits, Affirmations, Affidavits, and a Memorandum of Law. The preamble of case studies which I have provided to the registry of documents in this case are a courtesy for Parties to consider in their mandatory answer to the CROSS MOTION and MOTION TO DISMISS.

The legal basis and cause for justification will hopefully enforce yourself, personally, to understand the severity of the irreparable damages you have caused in the “Objectionable Conduct” exhibited by **MANHATTAN SKYLINE**, permitting yourself to represent their best interests, and electronically filing these documents and taking a willful

¹ Silber v. Sullivan Props., L.P. 2020 N.Y. Slip Op. 2538 Decided Apr 30, 2020

² Silber v. Sullivan Props., L.P. 2019 N.Y. Slip Op. 30533 Decided Feb 28, 2019

³ Warthen v Sullivan Props., L.P.

initiative to serve me hard-copies of those documents, and insisting on this procedure.

As a courtesy, I also included relevant cases herein this NOTICE - contrary to the approach, strategy and the grounds that you stand on, in any light, are “Objectionable” – and in any jurisdiction will be denied. You have wasted my time, invaded my privacy, and caused certain injury as referenced in the Exhibits in this matter:

I object to any further exhibition of myself in the public eye as referenced in the false, defamatory and misleading Exhibit(s), Affirmation(s), Affidavit(s) which have been “Objectionably” disseminated. I want absolutely nothing to do with any of these people, no mention of involvement in their matters, businesses, or acquaintances. Once again, I request that you remove the camera which you have verified in Exhibit, refused to remove over and extended period of time and this camera points directly through my window, onto my bed, and below my waistline, incontrovertibly and without my consent.

In furtherance you hereby accept this Notice of a Motion to Dismiss which contemporaneously will serve to dismiss the claims you have submitted in public records. Your position is both false and misleading, it is a violation of good faith and as seen in these proceedings – the neglect of my privacy, solitude, and the sanctity of my RESIDENCE is of no consequence.

You have accused myself of “Objectionable Conduct” and in the process of doing so have advocated the physical delivery of documents to my RESIDENCE, willfully and knowing that I am student, have filed a no fee waiver – and conveniently have requested to further encumber

my time and health by way of physical delivery this past week. This act alone poses a “nontrivial” attempt of murder committed by Plaintiffs, however, is incontrovertibly a blatant disregard for the implications of COVID-19 (which in fact causes immediate death), The New York Courts who proscribes to hard-copy filings – and most importantly, negligence of my well-being.

If you did not have knowledge of the implications of COVID-19, please send a complaint to Adnan so he can circulate another memo; I am confident there must be some information that can be provided to assert information to the contrary. The New York Supreme Court itself does NOT accept hard copy submissions and in support of those principles - you hereby accept this as NOTICE to Motion (CROSS MOTION), which also serves in the interest of a MOTION TO DISMISS under CPLR § 3211.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Dincer', with a date '8/2/20' written to the right. The signature is written over a horizontal line.

BARIS DINCER, TENANT
111 SULLIVAN STREET, APT 2BR
NEW YORK, NEW YORK 10012