

Lacy Katzen LLP • Attorneys at Law
Main Office: Legacy Tower, 600 Bausch & Lomb Place, Rochester, New York
Mailing Address: P.O. Box 22878, Rochester, New York 14692-2878
Telephone: (585) 454-5650 • (866) 250-2112 • Office Hours: 8:30 A.M. to 4:30 P.M. (EST)
New York City Department of Consumer Affairs License Number 2045950-DCA

February 17, 2023

Robert Broadhurst
357 Court Street, Apt. 3
Brooklyn NY 11231

Re: Accesslex Institute d/b/a Access Group v Robert Broadhurst
Index No. 504399/2022

Original Creditor: National City Bank
Original Account Number: XX2203
Lacy Katzen File Number: 700002906
Contact: Claire L. Frenz, paralegal at (585) 324-5775 (866) 250-2112 - Press 1

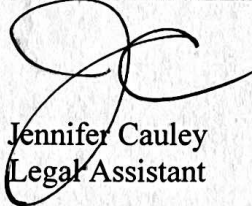
Dear Sir or Madam:

Enclosed please find the Notice of Motion with Return Date in connection with the above referenced matter. Please do not hesitate to contact our office should you wish to discuss this matter in greater detail.

This communication is from a debt collector. This is an attempt to collect a debt. Any information obtained will be used for that purpose.

Very truly yours,

LACY KATZEN LLP



Jennifer Cauley
Legal Assistant

/jc

Enclosures

STATE OF NEW YORK
SUPREME COURT

COUNTY OF KINGS

ACCESSLEX INSTITUTE D/B/A ACCESS GROUP

Plaintiff,

-vs-

NOTICE OF MOTION

Index No: 504399/2022

ROBERT BROADHURST

Defendant.

MOTION BY: Plaintiff, ACCESSLEX INSTITUTE D/B/A ACCESS GROUP by Lacy Katzen LLP, Legacy Tower, 600 Bausch & Lomb Place, P.O. Box 22878, Rochester, New York 14692-2878.
04/26/2023

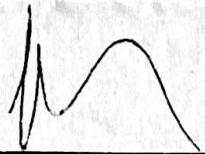
DATE, TIME AND PLACE OF MOTION: [REDACTED], 2023 at 9:30 a.m. at the Supreme Court, County of Kings, 360 Adams Street, Brooklyn, NY 11201 before the Presiding Judge.

RELIEF DEMANDED: An Order pursuant to CPLR §3212 for Summary Judgment against Defendant in the amount of \$37,625.24 plus previously accrued interest of \$1,494.34, unpaid late charges in the amount of \$35.00, together with the costs and disbursements of this action, and for such other and further relief as the Court deems just and proper under the circumstances.

SUPPORTING PAPERS: Affidavit of Christopher J. Mulvihill sworn to on November 14, 2022 and Attorney Affirmation of Mark H. Stein, Esq., dated February 5, 2023.

PLEASE TAKE NOTICE that answering affidavits and any notice of cross motion, with supporting papers, must be served upon Plaintiff's attorneys at least 7 days before the date of this Motion pursuant to CPLR §2214(b).

Dated: February 5, 2023
Rochester, New York



Mark H. Stein, Esq.
Lacy Katzen LLP
Attorneys for Plaintiff
Legacy Tower, 600 Bausch & Lomb Place
Mailing Address: P.O. Box 22878
Rochester, New York 14692-2878
Telephone: (585) 324-5775 (866) 250-2112

TO: Robert Broadhurst
357 Court Street, Apt. 3
Brooklyn NY 11231

From:

efile@nycourts.gov

Sent:

Thursday, February 16, 2023 12:02 PM

To:

NYSCEF Alert: Kings - Other Matters - Consumer Credit (Non-Card) Transaction -
<MOTION INFORMATION UPDATED> 504399/2022 (Accesslex Institute d/b/a Access
Group v. Robert Broadhurst)

Follow Up Flag:

Follow up

Flag Status:

Flagged



Kings County Supreme Court MOTION INFORMATION UPDATED

On 02/16/2023, Shelly Hammerstone **made a change to Document #7** - NOTICE OF MOTION.

1. A Motion Number was assigned: 1.
2. The Return Date was changed from 03/28/2023 to 04/26/2023.
3. A Motion Judge was assigned: Katherine Levine.

Case Information

Index #: **504399/2022**

Caption: **Accesslex Institute d/b/a Access Group v. Robert Broadhurst**

Assigned Case Judge: **Katherine Levine**

Motion Information

Document #: **7**

Document Type: **NOTICE OF MOTION**

Additional Document Information: **NOTICE OF MOTION FOR SUMMARY JUDGMENT**

Motion #: **1**

Relief Sought: **Judgment - Summary**

Return Date: **04/26/2023**

Filed Date: **02/06/2023**

Assigned Motion Judge: **Katherine Levine**

E-mail Notifications Sent

Name	Email Address
MARK STEIN	mstein@lacykatzen.com

E-mail Notifications NOT Sent

Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent

Party	Attorney
Robert Broadhurst, Defendant/Respondent	No Representation Recorded

Filing User

MARK STEIN | mstein@lacykatzen.com | 585-454-5650 | 585-269-3074 | 600 Bausch & Lomb Place,
Rochester, NY 14692

NOTICE: This e-mail is intended only for the named recipient and for the purposes of the New York State Courts E-Filing System. If you are neither the intended recipient nor a person designated to receive messages on behalf of the intended recipient, notify the sender immediately.

If you are unsure of the contents or origin of this email, it is advised to NOT click on any links provided. Instead, log into your NYSCEF account to access the documents referred to in this email. Thank you.