

**ABRAMS GARFINKEL MARGOLIS BERGSON, LLP**

1430 Broadway • 8th Floor • New York, New York 10018 • P: 212-201-1170 • www.agmblaw.com

July 2, 2025

VIA NYSCEF

Chambers of the Hon. Lawrence Knipel, J.S.C.
Supreme Court of the State of New York
Kings County Commercial Division, Courtroom 741
360 Adams Street
Brooklyn, New York 11201

Re: Columbia Capital Co. v. LL&L Real Estate Development, LLC, et. al.
Index No.: 515326/2024
Part: Commercial Motion Part 6
Order to Show to be presented on July 2, 2025 @12:00pm

Dear Honorable Sir:

Our office represents the Plaintiff in the above-mentioned commercial mortgage foreclosure action.

We have been advised that an order to show (“OSC”) will be presented for your signature by James Tamale, Esq., counsel for non-party, Lisa Christmas, today at 12:00pm. This will be counsel’s second OSC in the last few days. Your Honor declined to sign the most recent OSC presented on June 27, 2025.

The primary basis for counsel’s request for intervention by Lisa Christmas is to challenge the validity of the mortgages being foreclosed. This rationale is completely unavailing because Ms. Christmas was fully aware of the mortgage transactions. In fact, Ms. Christmas, simultaneously with delivery of the subject mortgages, executed payment guarantees for both mortgages being foreclosed. As such, there is no basis to grant such relief.

Notwithstanding the foregoing, if the Court is inclined to allow Ms. Christmas to be heard, counsel’s request for a stay should be rejected. Not only is there is no foreclosure auction scheduled, but counsel clearly fails to establish the three prongs required for a stay of the action.

Finally, it must be noted that any attempt to intervene in this action will result in Plaintiff taking every step possible to hold Ms. Christmas personally and fully liable for all amounts due and owing to the Plaintiff pursuant to the guarantees executed by Ms. Christmas.

Thank you for your courtesies in this matter.

Respectfully,

James E. Cantanno

James E. Cantanno

JEC:nb

cc: James Tamale, Esq. (via NYSCEF)