

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: IAS PART 54**

TAXI TOURS, INC.,

Plaintiff,

-against-

GO NEW YORK TOURS, INC.,

Defendant.

GO NEW YORK TOURS, INC.,

Counterclaim Plaintiff,

-against-

BIG BUS TOURS LIMITED, *et al.*,

Counterclaim-Defendants.

Index No. 653012/2019  
Hon. Jennifer G. Schechter**NOTICE OF CROSS-MOTION  
TO CONDUCT THIRD-PARTY  
DISCOVERY**

**PLEASE TAKE NOTICE** that Defendant/Counterclaim-Plaintiff Go New York Tours Inc., (“Go New York”) upon the accompanying memorandum of law in opposition to Counterclaim-Defendants’ Motion to Preclude the Expert Report and Testimony of Steven M. Sheffield (“Motion to Preclude”) and in support of its Cross-Motion to Conduct Third-Party Discovery, the affidavit of Maurice N. Ross in opposition and support of same, all the exhibits thereto, and upon all of the papers and pleadings herein, will cross-move, this Court, at the motion submission part at 60 Centre Street, Room 130, New York, NY 10007, on July 17, 2023, at 9:30 AM, or as soon thereafter as counsel can be heard, for an Order granting leave to conduct additional third-party discovery.

**PLEASE TAKE FURTHER NOTICE** that pursuant to stipulation between counsel answering affidavits and any reply are due on July 14, 2023.

Dated: New York, New York  
July 10, 2023

**BARTON LLP**

By: /s/ Maurice N. Ross  
Maurice N. Ross

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Go New York Tours, Inc.*