

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

----- x INDEX NO.: 70307/2021E

ANDRE DEJESUS,

Plaintiff,

- against -

THE GOVERNING BODY OF JEHOVAH’S
WITNESSES, WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, WATCH TOWER
BIBLE AND TRACT SOCIETY OF NEW YORK, INC.,
and CRESTON KINGDOM HALL OF JEHOVAH’S
WITNESSES,

Defendants.

:
:
: **NOTICE OF MOTION**
: **TO DISMISS**
:

COUNSELORS:

PLEASE TAKE NOTICE, that upon the annexed affirmation of EDWARD J. GUARDARO, JR. ESQ., dated March 11, 2022, and upon all the pleadings and proceedings heretofore had herein, the undersigned will move this Court on the 12th day of April, 2022 at the Supreme Court of the State of New York, Bronx County, at an IAS Part, at the Courthouse located at 851 Grand Concourse, Bronx, NY 10451, at 9:30 in the forenoon of that day, or as soon thereafter as Counsel may be heard for an Order as follows:

- a. Pursuant to 3211(a)(7), dismissing the complaint for failure to state a cause of action against the defendants WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and WATCH TOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC, and
- b. For such other, further and different relief as this Court shall deem just and proper.

PLEASE TAKE FURTHER NOTICE, opposition papers, if any, shall be served upon this Defendant at least seven (7) days prior to the return date of this motion.

Dated: White Plains, New York
March 11, 2022

FULLERTON BECK, LLP



Edward J. Guardaro, Jr.
Attorneys for Defendant,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and WATCH
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