

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

12-CV-252 (GLS/RFT)

JOSEPH J. O'HARA,

Plaintiff,

v.

KEITH A. RANIERE, ET AL

Defendants.

**NOTICE OF MOTION AND MOTION
FOR RULE 11 SANCTIONS AGAINST
DEFENDANT PRO SE JOSEPH J. O'HARA**

PLEASE TAKE NOTICE, that the undersigned, attorneys for Defendants Damon Morey LLP, William F. Savino, Beth Ann Bivona, Gregory Zini, and Bernard Schenkler, shall move before Hon. Gary L. Sharpe, United States District Court, United States Courthouse, 445 Broadway, Albany, New York on August 2, 2012 at 10:00 AM or as soon thereafter as counsel may be heard [on submit, without oral argument, unless otherwise ordered by the Court] for an Order for sanctions under Federal Rule 11, together such other relief as is just and equitable.

PLEASE TAKE FURTHER NOTICE that movants shall rely upon a supporting Brief and the Declaration of William F. Savino, Esq. with Exhibits as well as the pleadings and documents of record. A copy of the proposed Rule 11 motion was served on Defendant Joseph J. O'Hara on June 1, 2012.

PLEASE TAKE FURTHER NOTICE, that Defendant's opposition papers must be filed and served in accordance with Local Rule 7.1(b).

DAMON MOREY LLP

By s/ William F. Savino

William F. Savino, Esq.

Bar Roll No. 507064

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Dated: Buffalo, New York

June 1, 2012

To: Joseph P. O'Hara, Pro Se

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