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IN BRIEF

Vinson & Elkins Picks Up Head of Freshfields' US Energy and Infrastructure Practice

As competition continues for Big Law partners working in the energy sector, Vinson & Elkins has hired Melissa Raciti-Knapp, a partner with Freshfields in New York who was head of the U.S. energy and infrastructure group and co-head of the firm's Latin America practice.

Melissa Raciti-Knapp

Raciti-Knapp joined Vinson & Elkins on Thursday as a partner in the firm's New York finance practice. She focuses on project finance and project development, and a significant amount of her practice is in Latin America. She is fluent in Spanish.

"Melissa will help us meet the fast-rising demand for financing work on power, data center, and other infrastructure projects in the U.S. and abroad and will expand our relationships with key sources of capital for these sectors," Vinson & Elkins chair Keith Fullenweider wrote in a press release.

Eamon Nolan, co-office managing partner of the firm's New York office, wrote that she will be a "tremendous asset" to energy and infrastructure clients.

"Melissa is a dynamic, well-respected leader in project finance with diverse experience advising both on the borrower and lender side, including leading on the development of first-of-their-kind and utility-scale facilities throughout North America, Latin America, and the Caribbean," Nolan wrote.

Raciti-Knapp handles conventional and renewable power, mining, oil and gas, water treatment, telecom and other infrastructure projects, assisting sponsors, developers, and a range of financial institutions.

In an interview, Raciti-Knapp said there are few firms that could have lured her away from global firm Freshfields, which she joined in 1998 as an associate, but Vinson & Elkins' energy profile is "unmatched."

The move to Vinson & Elkins is good for her clients, she said, because of the firm's energy practice, but also its Texas offices. Also, the firm has expertise in areas such as the Federal Energy Regulatory Commission and tax, which benefit clients.

"All of that is here at Vinson & Elkins," she said.

Raciti-Knapp said she has done work for clients including KFW, the U.S. International Development Corp., Contour Global, Ocean Winds and Ara Partners.

Raciti-Knapp sees cross-selling opportunities at her new firm.

"It's not just what I would bring to Vinson & Elkins, but the clients at Vinson & Elkins, I think I can be helpful to. Just as an example, anything in Latin America. I've done deals all over Latin America," she said.

A spokesperson for Freshfields provided this comment on Raciti-Knapp's departure: "We wish Melissa all the best."

—Brenda Sapino Jeffreys

SPECIAL REPORT »9-13

Cravath M&A Partner Heads to Willkie

Willkie Farr & Gallagher has added a private equity and mergers and acquisitions partner from Cravath, Swaine & Moore in its New York office, the latest in a series of transaction-focused partners to make lateral moves in recent months.

Maurio Fiore joined Willkie's corporate & financial services department on Wednesday and its private » Page 4

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INSIDE LAW JOURNAL

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White House Fires Federal Judges' Choice for US Attorney For Northern District of NY

BY BRIAN LEE

WITHIN hours of a panel of federal judges on Wednesday exercising its authority to name a new U.S. attorney for a swath of upstate New York, the White House fired him.

The Board of Judges for the Northern District of New York appointed Donald T. Kinsella to the role of leading the 32-county Northern District of New York, which includes Albany and Syracuse.

But after 7 p.m. Wednesday, Kinsella had been terminated by President Donald Trump's administration, a Department of Justice source, speaking on background, told the New York Law Journal and Law.com.

The board can name a U.S. attorney when the position is vacant for 120 days, a move meant to end the tenure of John A. Sarcone III, who had no prosecutorial experience when U.S. Attorney General Pam Bondi named him acting U.S. attorney in March 2025.

The same Board of Judges declined to exercise its authority to appoint Sarcone as U.S. attorney when his 120-day appointment as acting U.S. attorney expired last year.

Sarcone is now back in charge of the office, with the title of first assistant U.S. attorney.

Kinsella, a former senior counsel for Whiteman Osterman & Hanna, Kinsella, could not be reached for comment.

He was sworn in during a private ceremony Wednesday, according to a statement by the board of judges.

Kinsella served as an assistant U.S. attorney in the dis- » Page 4

COURTESY PHOTOS

Erik Mengwall, **Thomas L'Helias** and **Mike Ginzburg**

Three-Partner Loeb & Loeb Team Moves to Baker & Hostetler in NYC

BY JOHN CAMPISI

Baker & Hostetler announced Thursday the arrival of three lateral hires in its business practice group and mergers and acquisitions team.

Joining the firm in New York are Thomas L'Helias, Erik Mengwall and Mike Ginzburg. All three come to Baker & Hostetler from Loeb & Loeb, which did not return a message seeking comment about the departures.

Baker & Hostetler says the additions will help expand its capabilities for financial and strategic buyers and sellers in middle-market M&A transactions.

In a statement, firm Chairman Paul Schmidt said middle-market M&A remains a "dynamic and highly competitive segment, and this team enhances our market credibility to position us to capture even more opportunities for our clients."

"We are delighted to welcome Tom, Erik and Mike to Baker-Hostetler," he said.

L'Helias was most recently a partner with Loeb & Loeb, where he previously landed after serving as a partner at Holland & Knight for close to six years. Before that, he spent time as a divisional senior vice president at Health Care Service Corp., where he went following time as an equity partner at Hunton Andrews Kurth, according to his LinkedIn profile.

Mengwall, his profile shows, was a partner at Loeb & Loeb for close to two-and-a-half years and before that headed up the legal department of a technology company.

Ginzburg, meanwhile, spent close to three years as a partner at Loeb & Loeb and before that served as senior counsel with Holland & Knight, where he landed at following time as an » Page 4

COURTESY PHOTO

Lowenstein Sandler's managing partner **Jonathan Wishnia** and the firm's chairman **Gary Wingens**

Lowenstein Sandler Elects First New Managing Partner in 18 Years

BY AMANDA O'BRIEN

LOWENSTEIN Sandler has elevated New York-based mortgage and structured finance practice chair and firmwide hiring partner Jonathan Wishnia to serve as the firm's managing partner, succeeding Gary Wingens, who served in the role for the past 18 years.

The partnership at the firm, ranked No. 110 in the most recent Am Law rankings, voted Thursday night to promote Wishnia into the role, effective immediately. Wingens will continue in the role of chairman.

"We are in a profession that is changing faster than it ever has before. The changes are dramatic, the winners and losers are pretty dramatic," Wingens explained. "In 2023, we went through the strategic planning process … our executive board came to the decision to adopt a leadership structure that looks like many more Am Law 100 firms, where we separate the chair and the managing partner role to provide more bandwidth for leadership and management of the firm."

As part of the split, Wingens will now primarily oversee external initiatives, focusing on the firm's overarching strategy, developing client relationships and soliciting client feedback.

"This will give me the opportunity to be more out- » Page 4

AI-Generated Docs Shared With Counsel Are Not Privileged, NY Fed Judge Rules In Criminal Fraud Case

BY NICHOLAS MALFITANO

IN a ruling with potential far-reaching implications, a New York federal court judge issued a bench order in a multi-million dollar fraud case stating legal documents generated with artificial intelligence tools lack confidential privilege.

On Tuesday, U.S. District Judge Jed S. Rakoff ruled that 31 AI-generated documents defendant Bradley Heppner produced using AI are not privileged and therefore prosecutors can access the materials before the criminal fraud trial. Ruling from the bench, Rakoff granted the U.S. District Court for the Southern District of New York's motion filed Feb. 6 seeking to access the documents. » Page 8

Judge Rakoff

Online

The Southern District decision is **posted at nylj.com.**

Cravath M&A Co-Chair Moves to GC Role at Martin Marietta

BY TRUDY KNOCKLESS

MARTIN Marietta Materials is bringing one of the country's most prominent deal lawyers in-house, hiring longtime Cravath Swaine & Moore partner George Schoen as executive vice president, general counsel and corporate secretary.

Schoen will join the Raleigh, North Carolina-based building materials giant in March, the company said. It will be the first in-house role for Schoen, who's been with Cravath nearly three decades.

Schoen arrives with a resume that includes helping to orchestrate some of the largest transactions of the past quarter-century, including Berkshire Hathaway's $37 billion acquisition of Precision Castparts in 2016, Disney's $71 billion purchase of 21st Century Fox in 2019 and Occidental Petroleum's $55 billion purchase of Anadarko that same year.

DAVID HANDSCHUH/ALM

George Schoen

He also represented companies in efforts to fend off activist investors, as well as in other capacities.

Schoen steps into a role currently held by Brad Khon, who joined Martin Marietta in December 2024 from silicon carbide technology company Wolfspeed. It was not immediately clear whether Khon is transitioning to a different position or departing the company; he continues to list himself as general counsel on LinkedIn.

Martin Marietta, Schoen and Khon did not immediately respond to requests for comment.

"I am honored to join Martin Marietta and excited for the opportunity to contribute to the company's continued success," Schoen said in a press release. "Martin Marietta's commitment to enterprise excellence, disciplined growth and long-term value creation is well known across the industry and beyond. I look forward to supporting the Company's mission and working with the management team, board of directors and our dedicated employees to » Page 4

New York Law Journal Inside

'Great Sadness': Gail Slater Announces Sudden Exit as DOJ's Antitrust Chief

BY SULAIMAN ABDUR-RAHMAN

PRESIDENT Donald Trump's top antitrust enforcer at the U.S. Department of Justice announced her sudden departure Thursday, raising alarm bells among several elected officials while introducing uncertainty over how the Justice Department will approach merger enforcement going forward.

"It is with great sadness and abiding hope that I leave my role as AAG for Antitrust today," Assistant Attorney General Gail Slater of the DOJ's Antitrust Division wrote Thursday in a social media post on X. "It was indeed the honor of a lifetime to serve in this role."

Slater likely felt pressure from U.S. Attorney General Pam Bondi or other high-ranking DOJ officials "to do things that she didn't feel was right and decided her reputation and honor were more important than continuing to serve in the role," said Troutman Pepper Locke partner Brad Weber.

DIEGO M. RADZINSCHI/ALM

Assistant U.S. Attorney General **Gail Slater**, head of the Justice Department's Antitrust Division

"Her replacement will understand going in that he or she may not have much independence in making decisions on enforcement and that there will be probably pressure from higher up into DOJ," Weber added.

Slater's exit from the Justice Department "increases uncertainty around some high-profile matters," Ryan Danks, a former senior DOJ antitrust enforcer, said Thursday in a written statement shared with Law.com and the National Law Journal.

"Career lawyers and economists at the [DOJ's Antitrust] Division will continue to pursue cases with [the] same professionalism and care that they always have," added Danks, an antitrust partner at Wilmer Cutler Pickering Hale and Dorr in Washington, D.C.

Bondi issued a brief statement Thursday thanking Slater for her service.

U.S. Sens. Elizabeth Warren, D-Massachusetts, and Amy Klobuchar, D-Minnesota, expressed deep concerns over Slater's exit.

"Her departure raises significant concerns about this Administration's commitment to enforcing the antitrust laws for the betterment of consumers and small businesses, including seeing through its cases against monopolies," Klobuchar said in a statement issued Thursday.

"Every antitrust case in front of the Trump Justice Department now reeks of double-dealing—Ticketmaster's stock is already surging," Warren said in her statement issued Thursday. "Congress has a responsibility to unearth exactly what happened and hold the Trump administration accountable."

Amid Slater's departure, "Republican and Democratic state Attorneys General will remain active in their enforcement efforts—perhaps even more so now—even while the [Justice] Department's leadership continues to exert greater control over the [Antitrust] Division than it did before," Danks said in his statement.

"While the federal government has abdicated its responsibility to look out for people's economic wellbeing—in California, we never will," California Attorney General Rob Bonta said Thursday in a statement. "My office has led the nation in consumer protection and antitrust work for decades, and we will continue to do so."

The U.S. Senate confirmed Slater to the DOJ's top antitrust enforcement job last March in a 78-19 bipartisan vote.

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FTC Chair Says Apple News May Suppress Conservative Voices, Calls for Audit

BY MICHAEL GENNARO

FEDERAL Trade Commission Chairman Andrew Ferguson on Thursday issued a formal warning letter to Apple CEO Tim Cook, alleging that Apple News may be violating the FTC Act by "systematically" suppressing conservative perspectives while boosting left-wing sources.

The letter marks a significant escalation of the Trump administration's scrutiny of Big Tech curation practices, raising the specter that the agency will bring an enforcement action against Apple.

The warning cites data from the conservative watchdog group Media Research Center claiming that Apple News editors have excluded conservative outlets such as Fox News and the New York Post from featured "morning edition" feeds while heavily promoting liberal publications.

Ferguson argues that suppression of conservative voices, if unstated, may constitute a "material misrepresentation or omission" to consumers who expect a neutral news aggregator. According to the chairman, any act by Apple News to suppress or promote articles based on perceived ideological viewpoints may violate the FTC Act if it is inconsistent with Apple's terms of service or the reasonable expectations of consumers.

He further emphasized that, while the FTC is "not the speech police," the agency is mandated to protect consumers from deceptive speech-related products.

Cook has gone to great lengths to maintain an amicable relationship with President Donald Trump in his second term, marked by high-profile gestures, including his personal $1 million donation to the president's inauguration committee and his presence at the inauguration ceremony itself.

Last month, Cook drew backlash from both employees and human rights advocates for attending a private White House screening of the documentary "Melania." The black-tie event occurred less than 12 hours after the fatal shooting of Alex Pretti by federal agents in Minneapolis.

While Ferguson acknowledged the FTC lacks the authority to mandate specific political content, he urged Apple to conduct a "comprehensive review" of its curation algorithms and terms of service.

DIEGO M. RADZINSCHI/ALM

Federal Trade Commission Chairman **Andrew Ferguson**

The FTC could pursue an "unfairness" claim if it can prove that Apple's curation causes substantial injury to consumers that is not outweighed by countervailing benefits. The chairman's letter concluded by encouraging Apple to take "corrective action swiftly," signaling that the administration's patience with Apple's editorial decisions is thinning.

Apple on Thursday told the BBC that it had no comment on the letter.

The regulatory pressure from the FTC, combined with a Bloomberg report of another product-release delay, sent Apple's shares tumbling on Thursday. Stock in the tech giant fell 5%, marking its worst single-day drop since April. The decline chopped $200 billion off the company's stock market value.

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Negative Headlines Left Ruemmler, Goldman No Choice but to Part Ways, Governance Expert Says

BY GREG ANDREWS

THE NEGATIVE headlines that Goldman Sachs was weathering day after day about Kathryn Ruemmler's close ties to Jeffrey Epstein ultimately left her and the gilded investment bank no choice but to part ways, according to a prominent corporate governance expert.

"You don't want anyone to be the center of that kind of attention that detracts from the organization," said Charles Elson, a retired University of Delaware business professor and founding director of its John L. Weinberg Center for Corporate Governance. "It isn't a positive for Goldman. At some point, the organization has to move forward."

Elson spoke with Law.com on Thursday, hours before Ruemmler, 53, tendered her resignation. She said in a statement that she'll leave June 30.

"Since I joined Goldman Sachs six years ago, it has been my privilege to help oversee the firm's legal, reputational, and regulatory matters; to enhance our strong risk management processes; and to ensure that we live by our core value of integrity in everything we do. My responsibility is to put Goldman Sachs' interests first."

Goldman CEO David Solomon said in a separate statement: "As one of the most accomplished professionals in her field, Kathy has also been a mentor and friend to many of our people, and she will be missed. I accepted her resignation, and I respect her decision."

Before Ruemmler joined New York City-based Goldman Sachs in 2020, she told company leadership that she had business dealings with Epstein while serving as a white-collar defense attorney at Latham & Watkins. She was a Latham litigation partner from 2007 until 2009 and again from 2014 to 2020. In between, she worked for President Barack Obama's administration in various capacities, including as White House counsel.

But emails between Ruemmler and Epstein released by the U.S. Department of Justice and by the U.S. House Committee on Oversight and Government Reform showed the two had an extremely close relationship in the years after his 2008 conviction for soliciting prostitution from a minor.

She described him as an "older brother" and called her "Uncle Jeffrey," and he bought her lavish gifts, including a luxury handbag and fur coat.

Ruemmler's high-profile role carried with it expectations that she would be careful about whom she associated with, said Jason Winmill, managing partner of the in-house consultancy Argopoint.

He said professionals "need to establish appropriate boundaries ... in complicated situations, and manage those boundaries vigilantly."

As CLO of Goldman Sachs, Ruemmler annually ranked among the nation's highest-paid legal chiefs. She earned $17.7 million in 2024, placing her sixth on the list. The only woman to make more was Apple's Katherine Adams, who earned $27.2 million and ranked third.

Ruemmler is the second legal leader brought down over ties to Epstein. Early this month, Brad Karp resigned as leader of Paul, Weiss, Rifkind, Wharton & Garrison after emails released by the DOJ captured Karp giving Epstein legal advice and asking Epstein to get his son work on a Woody Allen film.

"Recent reporting has created a distraction and has placed a focus on me that is not in the best interests of the firm," Karp said in stepping down as chair but remaining with the firm.

DIEGO M. RADZINSCHI/ALM

Kathy Ruemmler

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Expert Analysis

MENTAL HEALTH

Anxiety: Why Lawyers Have a Love-Hate Relationship With It

By **Jennifer Kupferman**

Anxiety is so common among lawyers that it has almost become invisible. We talk about stress, pressure, and burnout, but anxiety often sits quietly underneath all of it, driving our behavior, shaping our decisions, and influencing how we relate to our work. As a former lawyer who is now a psychotherapist specializing in working with lawyers, I see this pattern every day: lawyers who deeply dislike how anxiety feels, yet are terrified of letting it go because they believe it is the very thing that made them successful.

This love-hate relationship with anxiety doesn't come out of nowhere. It is cultivated early, rewarded consistently, and reinforced by the culture of the legal profession itself.

From the very beginning, law school selects for anxious traits. Hypervigilance, worst-case-scenario thinking, perfectionism, and a heightened sensitivity to risk are not accidental byproducts of legal training. They are core competencies. We learn to scan for flaws, anticipate threats, and imagine what could go wrong if a single detail is overlooked. In the classroom, these habits help you survive cold calls and issue-spot on exams. In practice, they help you protect clients, avoid malpractice, and stay one step ahead of opposing counsel.

Over time, many lawyers internalize a powerful narrative: my anxiety keeps me sharp. It pushes me to prepare more thoroughly, meet deadlines, catch mistakes others miss. And there is truth to this. Anxiety, in moderate doses, can enhance focus, motivation, and performance. It activates the nervous system in a way that mobilizes energy and attention. For lawyers, this can look like strong analytical thinking, meticulous preparation, and a deep sense of responsibility.

The problem is that anxiety is not a precision instrument. It does not know how to stay in its lane.

What begins as a useful signal often becomes a constant background hum. Lawyers find themselves feeling tense even when nothing urgent is happening, replaying conversations long after they end, or lying awake at night mentally revising briefs that have already been filed. The same anxiety that once helped them succeed now leaves them exhausted, irritable, and disconnected from their lives outside of work.

> Evidence-based psychological and somatic research tells a very different story. Anxiety is not an on/off switch. It is a dial.

And yet, when the idea of "reducing anxiety" comes up, many lawyers feel uneasy, sometimes even resistant. If anxiety has been a driver of achievement for years, what happens if it quiets down? Will I miss something? Will my performance suffer? Will I lose my edge?

This fear is understandable, but it rests on a false binary: either you are anxious and successful, or calm and careless. Evidence-based psychological and somatic research tells a very different story. Anxiety is not an on/off switch. It is a dial.

The goal is not to eliminate anxiety altogether. That would be neither realistic nor desirable, especially in a profession that involves real stakes and real consequences. The goal is to develop a different relationship with it, to learn when it is serving you and when it is simply draining your system.

One of the most important shifts I work on with lawyer clients is helping them distinguish between productive anxiety and chronic anxiety. Productive anxiety is time-limited and context-specific. It shows up when there is a real task to address and recedes when that task is complete. Chronic anxiety, on the other hand, lingers long after it is useful. It keeps the nervous system in a prolonged state of activation, even during moments that should allow for rest, recovery, or connection.

Neuroscience shows us that when the nervous system remains in a heightened state for too long, cognitive flexibility decreases. Decision-making becomes more rigid, emotional reactivity increases, and burnout risk rises. In other words, the anxiety lawyers believe they need to perform well can, when unchecked, undermine the very skills they value most.

Fortunately, there are well-established ways to "turn the dial down" without throwing it away entirely. Nervous-system-informed therapies, such as EMDR and somatic therapy, help lawyers learn how to regulate physiological arousal rather than simply trying to think their way out of anxiety. This matters because anxiety is not just a thought pattern; it is a full-body experience.

When lawyers learn how to notice early signs of nervous system activation and intervene, through grounding, breathwork, movement, or relational support, they gain flexibility. Anxiety no longer runs the show automatically. It becomes information rather than a constant command.

Perhaps the most liberating realization for many lawyers is this: calm does not mean complacent. You can be focused without being frantic. You can be diligent without being depleted. You can care deeply about your work without your nervous system acting as if every email is a five-alarm fire.

As a former lawyer, I understand how hard it can be to imagine succeeding without the familiar pressure of anxiety pushing you forward. But as a psychotherapist, I have seen again and » Page 7

JENNIFER KUPFERMAN *is a former Biglaw attorney who is now a psychotherapist in private practice, specializing in working with New York lawyers.*

LABOR LAW

Second Circuit Clarifies Transportation Worker Exemption to FAA

By **Michael James Maloney**

In a Dec. 22, 2025 opinion in the case *Silva v. Schmidt Baking Distribution, LLC*, 162 F.4th 354 (2d Cir. 2025), the Second Circuit Court of Appeals joined the Third, Ninth, and Tenth Circuit Courts of Appeal in interpreting the interstate transportation worker exemption to the Federal Arbitration Act (FAA), 9 U.S.C. §1, as including so-called "last-mile" delivery drivers.

This exemption, found in §1 of the FAA, excludes from the scope of the FAA agreements to arbitrate disputes arising from "contracts of employment of seamen, railroad employees, or any other class of workers engaged in foreign or interstate commerce." Workers who fall within the scope of this exemption can avoid contractual obligations to arbitrate disputes relating to their work. Workers who do not qualify for the exemption might be compelled to arbitrate if their employers require them to sign an arbitration agreement as a condition of employment.

The §1 exemption for workers engaged in foreign or interstate commerce has given rise to various judicial rulings in recent years and, more recently, a circuit split. In a 2019 decision in a case called *New Prime Inc. v. Oliveira*, 586 U.S. 105 (2019), the Supreme Court ruled that the §1 exemption excludes from the FAA both direct employer-employee relationships and independent contractor relationships so long as those relationships involve the type of work enumerated in the text of the statute. Thus, structuring a relationship in the form of an independent contractor agreement does not avoid the §1 exemption if the work being performed involves transportation in foreign or interstate commerce.

In a 2022 decision entitled *Southwest Airlines Co. v. Saxon*, 596 U.S. 450 (2022), the Supreme Court interpreted the scope of the clause "engaged in foreign or interstate commerce" in the §1 exemption. The employee in *Southwest Airlines* was an airline ramp supervisor who frequently loaded and unloaded baggage but was never required to cross a border. The employee argued that any employee of an enterprise involved in foreign or interstate commerce falls within the scope of the §1 exemption while the employer argued that only employees actually required to cross state or international borders qualify. The Supreme Court rejected both of these arguments and held that workers "directly" or "actively" "engaged in transportation" of "goods across borders" qualify for the §1 exemption.

> The Supreme Court vacated and reversed, holding that the language of §1 is focused on the nature of the work performed by the worker, not the industry of the employer.

In a 2024 decision in a case called *Bissonnette v. LePage Bakeries Park St.*, 601 U.S. 246 (2024), the Supreme Court vacated a ruling by the Second Circuit rejecting application of the §1 exemption to a worker whose employer was not engaged in the transportation industry. The employer in *Bissonnette* argued that the §1 exemption did not apply because it was a business operating in the bakery industry, not the transportation industry. The Second Circuit affirmed an order by the District Court rejecting application of §1 and dismissing the *Brissonnette* case in favor of arbitration. Although the Second Circuit later granted rehearing to consider the impact of the Supreme Court's ruling in Saxon, it ultimately adhered to its prior ruling dismissing *Brissonnette*.

The Supreme Court vacated and reversed, holding that the language of §1 is focused on the nature of the work performed by the worker, not the industry of the employer.

More recently, a circuit split has emerged regarding whether last-mile delivery drivers qualify for the §1 exemption. The Third, Ninth, and Tenth Circuits have recently issued decisions concluding that last-mile delivery workers do qualify for the exemption. See *Adler v. Gruma Corp.*, 135 F.4th 55, 69 (3d Cir. 2025); *Rittmann v. Amazon.com, Inc.*, 971 F.3d 904, 919 (9th Cir. 2020); *Brock v. Flowers Foods, Inc.*, 121 F.4th 753, 764 (10th Cir. 2024), cert. granted sub nom. *Flower Foods, Inc. v. Brock*, 146 S. Ct. 327 (2025). But in its 2022 decision in *Lopez v. Cintas Corporation*, the Fifth Circuit Court of Appeals reached a contrary decision. *Lopez v. Cintas Corp.*, 47 F.4th 428, 431 (5th Cir. 2022). These decisions regarding last-mile delivery drivers contrast with decisions holding that rideshare and food-delivery drivers do not qualify as transportation workers engaged in interstate commerce. See *Brock*, 121 F.4th at 763, citing *Cunningham v. Lyft, Inc.*, 17 F.4th 244, 253 (1st Cir. 2021); *Immediato v. Postmates, Inc.*, 54 F.4th 67, 78 (1st Cir. 2022); *Singh v. Uber Techs., Inc.*, 67 F.4th 550, 560 (3d Cir. 2023); *Wallace v. Grubhub Holdings, Inc.*, 970 F.3d 798, 802–03 (7th Cir. 2020); *Capriole v. Uber Techs., Inc.*, 7 F.4th 854, 863–64, 866–67 (9th Cir. 2021).

With this backdrop of precedent interpreting the §1 exemption and the circuit split regarding last-mile delivery drivers, the *Silva* case presented a slight twist for the Second Circuit to consider: The defendant in *Silva*, a bakery products distributor, required each of its truck drivers to incorporate as their own business. The distributor then entered into separate contracts with each truck driver's corporation, including provisions requiring arbitration of all disputes. When two of the commercial truck drivers brought employment claims, the District Court granted motions by the distributor to compel arbitration and stay litigation. The truck drivers appealed to the Second Circuit arguing » Page 7

MICHAEL JAMES MALONEY *is an attorney and arbitrator in New York City.*

Off the Front

Lowenstein

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wardly focused, including focusing on clients, which is one of the things I've always wanted to do in this role since 2008," Wingens said. "I haven't had enough time to meet with more than six clients a year—I'm hoping to dramatically increase that in the coming year and get more insight into how clients are thinking, how they're experiencing the firm, and bring that back to the executive board and to Jon."

Meanwhile, Wishnia will be tasked with managing day-to-day operations at the firm, working alongside chief operating officer Michael Caplan, and ensuring that Lowenstein carries out its strategic plan. As part of that objective, Wishnia is currently in the process of creating a management committee to help expose more partners to leadership responsibilities.

"The goal of the management committee is to create leadership bandwidth. We're going to have a number of specific partners involved in firm management who will handle defined operations portfolios we're working through as we evolve the committee into what we want it to be," Wishnia said. "We've got a lot of wonderful people with excellent skills, and this allows me to continue my practice as well. I want to practice 30% to 40% of the time … Having folks with dedicated portfolios allows me to (do that) and go to large conferences in the securitization space and visit clients like I normally do."

Indeed, the broader expansion of leadership and operational management skills is part of the firm's succession planning effort. While Wingens will remain a key leader at Lowenstein for the foreseeable future, he wanted to ensure that he could pass along his knowledge and experience to successors on his own timeline.

"I've been in this dual role for 18 years, and while I'm not slowing down anytime soon, it makes a lot of sense to make sure we've got other folks in management who are well-versed in other operations of the firm," Wingens said. "We are transitioning my knowledge base and my institutional memory to other people at a time where we can do it at our own pace without external pressure and without needing to rush anything."

Eighteen Years of Transformation

Under Wingens' leadership, Lowenstein Sandler has seen staggering growth and transformation over the last 18 years. The firm's compound annual growth rate for both its revenue and net income over Wingens' term as chair and managing partner was 6.5%; specifically, revenue increased by 193% from $178.7 million in fiscal year 2008 to $523.4 million in fiscal year 2025, while profit increased by 192% from $65.5 to $191.3 million.

"I started in this role at the beginning of the financial crisis … We have seen a lot, and the first strategic plan that I led as managing partner in 2009 had us really focusing on sectors before it was commonly popular for firms to focus on sectors," Wingens recalled, having steered the firm towards focusing on private funds, technology companies and portions of the life sciences industry.

"At the time I came into the role, well less than half of the business of the firm was in sectors in those areas—now it makes up to 75% of the business of the firm … We have seen real transformation in the makeup of our practice groups," he said.

During Wingens' tenure, the firm's headcount grew at a compound annual growth of 2.1%, from 245 to 348 attorneys. Wingens' shift in hiring strategy is reflected in Law.com Compass data generated from 2016 through 2025 that shows the firm prioritized hiring in corporate and business, banking and finance, venture capital and private equity, and litigation practice groups.

A closer look at the firm's headcount growth, however, shows that Lowenstein Sandler has embraced another strategic shift under Wingens' leadership, prioritizing nonequity tier growth while controlling and shrinking the equity partner tier—a strategy employed by other members of the Am Law 200 to help boost profitability. The firm shrank its equity partner headcount from 74 equity partners in fiscal year 2008, the first year under Wingens' leadership, to 46 in 2025, while its nonequity tier grew from 15 nonequity partners in 2008 to 86 in 2025.

Challenges Ahead

The legal industry has grown more competitive over the last 18 years, and Lowenstein's overhaul of its leadership structure is designed to ensure the firm can keep pace with its competitors.

"We have to make sure that we're recruiting really, really well and really smartly. We have a commitment to continue to beef up the areas most important to our partners, and we have a very significant commitment to keeping up with technology and implementing new technology as we go," Wingens said. "Those are both enormously resource intensive, from a capital perspective, a human perspective, and a leadership perspective. We need the management bandwidth to be able to do it."

While the firm's competitive edge requires ongoing investment, Wingens has already observed a return on that investment in the firm's fiscal year 2025 results. Lowenstein saw double digit growth year-over-year across all its financial metrics, which Wingens attributed to returns from investments in AI and in talent.

Still, Lowenstein is facing a competitive environment rife with consolidation and an abundance of technological shifts. The firm is inclined to remain independent, given its ongoing success, and Wishnia particularly emphasized the importance of preserving the firm's culture moving forward.

"Our growth has been primarily organic. We haven't sought a large-scale merger nor do we intend to, because we like to be a firm where people know their partners and people work really well together," Wishnia said. "This is a place where it is incredibly important to know who we are even as other firms are disappearing. In terms of practice groups themselves, we are very different than the firms that have merged, consolidated or shut down."

Wingens added that despite scale being a predominant theme for the current legal market, Lowenstein's slimmer headcount will prove to be an advantage in the face of AI improvements.

"We know the state of AI today is the worst it's ever going to be. We're making a bet that a firm of 400 lawyers today with aspirations of growing by 100 to 200 lawyers over next few years is going to leverage technological transformations in AI to have the productive capacity of a firm that has many thousands of lawyers," Wingens said. "As we ask ourselves if we're willing to make that investment and commitment, we ask what's more fun for our partners and leaders: to be growing from 400, 500, 600 lawyers or to be a 2,000 or 2,500 lawyer firm that realizes it only needs half of those lawyers?"

"I know plenty of shrinking firms and growing firms, and it's more fun to be the growing firm than the shrinking firm," he continued. "That's the bet we're making."

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Federal Judges

« Continued from page 1

trict from 1989 until 1998, when he was promoted to criminal chief of the office. Kinsella retired from the U.S. attorney's office in 2002.

A graduate of Boston University School of Law, Kinsella has more than 50 years of experience in complex criminal and civil litigation, according to the board of judges.

COURTESY PHOTOS

Donald T. Kinsella and **John Sarcone**

His short-lived installment comes after Senior U.S. District Judge Lorna Schofield ruled that Sarcone wasn't properly appointed as the U.S. attorney. In a Jan. 8 ruling, Schofield found the Trump administration circumvented the requirement that U.S. attorneys be confirmed by the U.S. Senate.

Schofield disallowed Sarcone from involvement in two grand-jury subpoenas in federal probes of New York Attorney General Letitia James, centering on civil cases her office brought against the National Rifle Association and President Donald Trump in the period between his two presidential term.

Federal courts have issued similar holdings regarding the Trump administration's appointment of federal prosecutors in New Jersey, Virginia, California and Nevada that bypassed the Senate confirmation process.

The Department of Justice is appealing Schofield's ruling concerning Sarcone's status to the U.S. Court of Appeals for the Second Circuit.

The northern district hasn't had a Senate-confirmed U.S. attorney since Carla Freedman, a Democrat nominated by former President Joe Biden, left office upon Trump starting his second presidential term in January 2025.

Prior to the White House's move to terminate Kinsella, Carl Tobias, the Williams chair in law at the University of Richmond, told the Law Journal and Law.com that the federal administration had the authority to reject Kinsella as U.S. attorney, similar to the chain of events concerning a federal court in New Jersey invalidating Alina Habba as U.S. attorney, with a panel of judges appointing Desiree Grace into the role.

As for the DOJ's appeal to the Second Circuit, Tobias suggested it "may not be successful." The professor said "the Second Circuit may not be inclined to do them any favors."

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Baker & Hostetler

« Continued from page 1

associate at Mintz Levin Cohn Ferris Glovsky & Popeo.

The team, in a collective statement, said they were drawn to Baker & Hostetler because of its strategic platform advantages, deeper resources in corporate and M&A, and a "proven and recognized brand to both strategics and private equity."

"We expect 2026 to be a strong year for M&A and corporate practices generally, particularly in the middle market and in sectors such as technology, healthcare and industrials in which our group has deep experience," the group said. "Market fundamentals—including increased private equity activity, pent-up strategic demand and greater clarity around interest rates—support what we expect will be a meaningful uptick in deal flow."

Jorian Rose, Baker & Hostetler's New York managing partner, said in a statement that the firm has been working to expand its M&A and complex transaction practices in New York.

"The addition of Tom, Erik and Mike is an instrumental step in our continued expansion. They played leadership roles in some of the most significant M&A transactions over the past year. We look forward to welcoming them to our New York office and the firm," he said.

L'Helias will primarily focus his practice on M&A, capital markets, private equity and corporate governance, while Mengwall has experience as both an in-house counsel and as an external counsel to public and private companies in various domestic and cross-border corporate transactions.

Ginzburg, meanwhile, advises public and private companies and financial sponsors on a wide array of corporate transactions, including domestic and cross-border M&A, leveraged buyouts, minority investments, joint ventures, recapitalizations and securities transactions.

L'Helias, Mengwall and Ginzburg say they look forward to taking their practice to the next level, operating on a larger more national platform.

"We also wanted to be part of an organization with a formidable track record and a tested plan for further growth and success," the group said in their statement. "We're excited about the opportunity to continue growing the practice here and to contribute to the firm's momentum in New York and nationally."

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Outside Counsel

AVOID Act Set To Impose Strict Deadlines on Joining Third Parties

By **Roy Schwartz** And **Harrison N. Perlstein**

On Dec. 19, 2025, the "Avoiding Vexatious Overuse of Impleading to Delay" ("AVOID") act was signed into law and is set place to go into effect on April 18. This new legislation will impact defendants seeking to bring third-party defendants into a lawsuit. Moving forward, strict deadlines will expedite suing potentially liable parties.

The AVOID Act revises Civil Practice Law and Rules (CPLR) §1007 ("When Third-Practice Allowed"). As currently written, CPLR §1007 provides no explicit time restrictions for impleading third parties.

The revised CPLR §1007 requires that, where a third-party defendant's liability to a direct defendant (for all or part of a plaintiff's claim) is premised upon contract provisions, the direct defendant must implead the third-party defendant within 60 days of filing the direct defendant's answer. Second Third-Party claims are given 45 days; Third Third-Party claims have 30 days, and all subsequent party claims have twenty days. The new CPLR §1007 contains certain carve-outs, for example, relative to the workers' compensation law.

In circumstances arising outside of a contract provision, the defendant will have 60 days to file and serve a third-party summons and complaint after "becoming aware" that the potential third-party defendant "is or may be liable to the defendant for all or part of a plaintiff's claim." This "becoming aware" standard will inevitably become the basis for future dispositive motions on timeliness, as parties debate what triggering event should have given notice that a new party must be impleaded.

Per the AVOID Act's stated justification, under the existing CPLR §1007 (which lacks strict deadlines), "Clever defendants have thus developed an egregious strategy to add years to any case and, during that respite, avoid financial accountability.

These defendants deliberately delay the case by impleading known or identifiable third-party defendants into a case on a rolling basis, one after another, etc."

> This new legislation will impact defendants seeking to bring third-party defendants into a lawsuit. Moving forward, strict deadlines will expedite suing potentially liable parties.

The sponsor memo points to discovery beginning "anew" when a party joins a case, thus prolonging litigation. In short, the AVOID Act is intended to expedite a litigation's resolution and reduce costly gamesmanship.

The AVOID Act will impact construction litigation. Construction litigation routinely involves third-party and second third-party claims, given the multi-tiered contractual relationships involving developers, construction managers, contractors, subcontractors, suppliers, designers, and subconsultants.

Moving forward, once sued, construction defendants will need to immediately collect and review their various contracts to identify potential third-parties. Construction defendants will need to immediately assess their own potential exposure, the exposure of third parties, contractual obligations, and potential indemnities.

Putting aside mere contract review, construction defense attorneys will also be tasked (at this early litigation phase) with investigating whether or not their clients are somehow already on notice of potential third-party defendants who are not in contractual privity.

Because these kinds of investigations and analysis can take time, and because the "starting gun" may begin with the defendant's answer, it is foreseeable that construction defense attorneys will more-frequently request extensions before filing answers.

As a practical impact of the AVOID Act, risk-adverse, direct defendants will not want to face a court's ruling that they lost an opportunity to implead third-parties by waiting. Construction attorneys will need to make judgment calls particularly if the plaintiff's pleadings contain sparse information about the events giving rise to the lawsuit.

Given the AVOID Act's short time restrictions, a direct defendant will be unable to first receive a plaintiff's bills of particulars, interrogatory answers, or documents before deciding whether or not to implead certain parties.

As a result, construction lawsuits may end up with more participants than they otherwise would, and some participants may prove peripheral. Peripheral defendants would need to respond to the lawsuits, possibly file counterclaims and crossclaims, and participate in discovery. Construction attorneys should anticipate a possible uptick in dispositive motion practice by peripheral third-parties.

The revised CPLR §1007 will go into effect on April 18, 2026.

ROY SCHWARTZ *is a partner at Zetlin & De Chiara.* HARRISON N. PERLSTEIN *is an associate at the firm.*

IN BRIEF

« Continued from page 1

equity and M&A practice groups, according to the firm's announcement. Fiore was a partner at Cravath for three years in New York, after serving as an associate there.

Fiore is one of several transaction-focused attorneys to make moves during the especially active lateral market of the past year, and only the latest of the finance and transaction partners that Willkie has already brought on in 2026. The firm already added Jesse Kean, an asset management partner from Sidley Austin, and private wealth partner Kenneth Halcom, a former Cravath partner himself who joined Willkie from a Florida-based trust.

Maurio Fiore

Fiore is at least the fifth partner to leave Cravath in 2026, with others headed to competitor firms such as Paul Hastings and Davis Polk & Wardwell, while another partner moved to a fintech company.

A representative for Cravath said in an email to Law.com that the firm wishes Fiore well in his future endeavors.

Jeffrey Poss, co-chair of Willkie's private equity practice and incoming joint chairman of the firm as a whole, said in a statement on Fiore's arrival that his knowledge and talents will benefit the firm and its clients in the transactional space.

"Maurio is an accomplished dealmaker, and his broad experience advising private equity sponsors and corporations on complex, high-value transactions makes him an excellent fit for Willkie and further enhances our ability to deliver best-in-class solutions to clients across the transactional landscape," Poss said.

Poss' sentiments were echoed by Adam Turteltaub, co-chair of the firm's M&A practice group, who said that Fiore "has played a significant role in some of the most sophisticated M&A and private equity transactions in the market in recent years."

In a statement on his move to Willkie, Fiore said the firm is "widely regarded for its strength across corporate sectors" and that he had long-admired the firm's global transaction platform. He said he looked forward to working with the practitioners at his new firm and helping his clients navigate "dynamic changes shaping private equity and other key markets."

— Ryan Harroff

Simpson Thacher, Davis Polk Lead on $10B Japan-US IPO

Simpson Thacher & Bartlett and Davis Polk & Wardwell are in the lead roles advising on the IPO of PayPay, which is expected to raise between $10 billion to $19 billion.

According to official filings, Simpson Thacher partners Takahiro Saito and David Snowden in Tokyo, are leading the firm's advice to PayPay Corporation's planned U.S. debut. The deal could mark the largest ever listing for a Japanese company on an American bourse.

Davis Polk's head of Japan, Jon Gray, and Takyo corporate partner Christopher Kodama are advising the underwriters. Goldman Sachs, J.P. Morgan, Mizuho Securities USA, and Morgan Stanley are acting as joint book-running managers for the IPO.

PayPay is Japan's dominant QR-code payments application and is backed by Japanese multinational investment holding company Softbank Group. Founded in 2018 as a joint venture between SoftBank and Yahoo Japan, PayPay has since grown to serve 70 million users and has expanded its offerings to include credit cards and banking services.

In a separate transaction, Morrison & Foerster and Paul Hastings are at the forefront of a multi-billion-dollar Japanese invesment in the U.S.

Japanese homebuilder Sumitomo Forestry is acquiring one of America's largest homebuilders, Tri Pointe Homes.

Sumitomo is being advised by Morrison & Foerster, while the target company is being advised by Paul Hastings.

As part of the deal, Sumitomo Foresty will acquire all of Tri Pointe's shares through its U.S. subsidiary for $4.1 billion. Following the deal, Tri Pointe will no longer be listed on the New York Stock Exchange and will continue to operate as a distinct brand, led by its existing management team, according to a joint statement by both parties.

Japanese investments in the U.S. grew 20% year-on-year in the first seven months of last year. According to data by the London Stock Exchange Group, the total value of acquisitions of American businesses by Japanese companies reached $25.5 billion in the first seven months of 2025. M&A activity during that period between the two countries was dominated by the materials industry. Last June, Nippon Steel completed the highly contested $14.9 billion acquisition of U.S. Steel. A month later, Toyota Tsusho acquired a U.S. car recycling company for $900 million.

—Jessica Seah

Schoen

« Continued from page 1

advance the company's strategic priorities."

In the press release, Martin Marietta CEO Ward Nye said, "George is an exceptional legal mind and a proven strategic adviser. His extraordinary experience leading major public company transactions, combined with his deep understanding of corporate governance, and his superb advice to Martin Marietta over the years as outside counsel, make him uniquely suited to lead our legal function as we continue advancing our strategic and operational goals."

Schoen joined Cravath in 1998 and became a partner in 2005. He also served as the firm's corporate hiring partner from 2011 to 2014.

During his career, Schoen has represented companies in construction materials, energy, industrials, media, technology, health care and financial services.

He earned his bachelor's degree from Cornell in 1995 and his law degree with honors from the University of Chicago in 1998.

Martin Marietta—which supplies aggregates, cement, ready-mixed concrete and asphalt—generates more than $6 billion in annual revenue. Its operations span 28 states, Canada and the Bahamas.

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Technology Today

ARTIFICIAL INTELLIGENCE

The RAISE Act: A Compliance Guide for Counsel

By **Ling W. Kong**

On Dec. 19, 2025, New York Governor Kathy Hochul signed the Responsible AI Safety and Education (RAISE) Act into law, establishing the Empire State as a primary regulator of the artificial intelligence industry. However, the bill originally presented to the governor (S.6953-B) contained deployment bans and oversight that drew sharp criticism from the technology sector. As anticipated, the governor's approval was conditioned upon a binding agreement with the Legislature to pass immediate "Chapter Amendments."

Those amendments, codified in Senate Bill 8828 and Assembly Bill 9449, have now been enacted as of January 2026. These amendments effectively repeal the text of the December bill and replace it with a new, more targeted regulatory regime. While the administrative provisions take effect immediately, the substantive compliance obligations for developers will commence on Jan. 1, 2027.

The signing came just days after President Donald Trump issued an executive order targeting state AI regulation, setting the stage for potential federal-state conflicts. Yet New York moved forward, with Hochul declaring that "New York is once again leading the nation in setting a strong and sensible standard for frontier AI safety, holding the biggest developers accountable for their safety and transparency protocols."

This article provides a comprehensive legal analysis of the final enacted law, distinguishing the version signed by the governor from the Chapter Amendments. It outlines the tiered compliance structure, the removal of the deployment ban, and the immediate steps counsel must take to prepare clients for the 2027 effective date.

ADOBE STOCKS

The Legislative Pivot: From Prohibition to Governance

To properly advise clients, counsel must understand the fundamental shift in regulatory philosophy embodied by S.8828. The original bill was predicated on a "precautionary prohibition" model, which banned the deployment of any model posing an "unreasonable risk of critical harm." This subjective standard threatened to freeze model releases and invite endless litigation.

The enacted Chapter Amendments abandon this approach in favor of a "transparency and mitigation" framework. The new law does not ban models. Instead, it mandates that developers show their work regarding safety protocols, leaving the ultimate decision to deploy within the developer's discretion—provided they have complied with rigorous transparency and reporting requirements. Furthermore, oversight authority has been transferred from the Division of Homeland Security and Emergency Services (DHSES) to the Department of Financial Services (DFS), a sophisticated regulator with deep experience in quantitative modeling and corporate auditing.

Scope of Applicability: The Two-Tiered System

A critical nuance of the enacted law—often lost in general reporting—is its bifurcated scope. The RAISE Act applies to two distinct categories of entities: "Frontier Developers" and "Large Frontier Developers." Counsel must carefully analyze which tier their client falls into, as the obligations differ significantly.

1. The Technical Threshold: 'Frontier Model'1

The jurisdiction of the Act is triggered by the training of a Frontier Model. Under Section 1420(9), a model qualifies if it is trained using a quantity of computing power greater than 10^26 integer or floating-point operations (FLOPS).

• Cumulative Compute: The definition includes computing power used for the original training run plus any subsequent fine-tuning, reinforcement learning, or material modifications. Counsel must advise engineering teams to track cumulative compute budgets across the entire model lifecycle. A model initially trained below the threshold could inadvertently trigger the Act » Page 8

It is a misconception that the RAISE Act only regulates "Big Tech." While "Large" developers face the heaviest burden, all Frontier Developers—regardless of revenue—must comply with three critical provisions effective Jan. 1, 2027.

LING W. KONG *dummy is a partner at Michelman Robinson.*

Attorneys Aren't Talking About AI With Each Other, But Everyone Agrees They Should Be

BY RILEY BRENNAN AND BENJAMIN JOYNER

AS ATTORNEYS continue to get themselves in trouble with courts across the country for artificial intelligence mishaps, experts in the field agree that disclosures and conversations around the topic are becoming increasingly necessary.

Litigators across the country have faced sanctions and other disciplinary actions for having AI "hallucinations" in their briefs, which occurs when an AI model produces fake or inaccurate information. Last month, a federal judge in Pennsylvania sanctioned two attorneys over various false case citations in a brief that allegedly occurred after the pro hac vice attorney's law clerk used LexisNexis's AI tool without the attorney's knowledge.

Such cases highlight an underlying problem in the changing technological and legal landscape, specifically whether attorneys are discussing expectations regarding AI usage when working together.

Dan Siegel of the Law Offices of Daniel J. Siegel shared that many attorneys do not have conversations regarding AI usage before working together. He noted that, while disclosure of generative AI usage isn't always required by courts, competence—including technological competence—is.

"It doesn't really matter whether you are local counsel or you're counsel. The same rules really apply, and that's that you have to check all the cites. If you're allowing any tool to write portions of a brief, you are supposed to check the cites as you would if you had done it 30 years ago," Siegel said. "It's an obligation that lawyers have to be competent. But it's easy also just to sometimes cut corners."

Siegel, who is the chair of the Pennsylvania Bar Association committee on legal ethics and professional responsibility, said that, while attorneys trust tools like Lexis, "If they're using AI, and they know they're using AI, it shouldn't change the calculus in terms of what they have to do as lawyers."

Many law firms have crafted written AI governance policies and strategies to mitigate AI-related risks ranging from hallucinations to accidental leakage of sensitive client data. While these policies can help, experts who have helped firms develop AI policies told Law.com that they are of limited use in surfacing hallucinations in work product from co-counsel. The wide range of uses make a one-size-fits all provision—beyond seeking full disclosure on a case-by-case basis—very challenging. Moreover, the ubiquity and increasing capability of these tools makes AI difficult to detect absent explicit acknowledgment.

"The duty to verify work product from co-counsel has always existed," noted D. Casey Flaherty, a partner at legal growth advisory firm Baretz+Brunelle and head of LexFusion Intelligence, B+B's market intelligence offering. "What's different » Page 8

Legal Tech Companies Rush To Integrate Claude's Legal Plugin

BY ELLA SHERMAN

WHILE some in the legal tech world view Anthropic's recent introduction of its Claude Cowork legal plugin as a challenge to legal tech companies, others see it as an opportunity.

Last week, just days after Claude's legal plugin was introduced, San Francisco-based contract lifecycle management (CLM) provider Pramata announced that it would be offering an extension for the tool. And other legal tech companies are interested as well.

The response runs counter to concerns some experts voiced that the large language model (LLM) developer's new legal plugin could threaten legal tech companies that offer similar capabilities.

COURTESY PHOTO

Pramata chief revenue officer **Justin Schweisberger**

"Everybody's reaction was melting down. Our reaction internally was, 'What took so long?'" Pramata chief revenue officer Justin Schweisberger told Legaltech News. "We have this rich data and contract intelligence from your corpus of contracts that contain all the rules that define your commercial relationships, and for those, the LLMs don't have access to those and they never will. For us, that's what we view as proprietary, and so the thought process to integrate into this, we'd already been working down that path."

Claude's new legal plugin provides users with capabilities like document review, flagging risks and tracking compliance. Pramata's extension will provide its customers with additional capabilities allowing them to query full contract histories for specific documents and compare negotiation positions with past agreements and playbooks.

Pramata did not have to work closely with Anthropic to develop this extension, as it used Model Context Protocol (MCP), an open-source standard that helps connect artificial intelligence systems with data sources, to integrate with the legal plugin.

London-based CLM provider Leah is also considering adding Claude's legal plugin, as the » Page 8

Legal Writing Platform BriefCatch Acquires Legal Editing Company WordRake

BY ELLA SHERMAN

VIRGINIA-based legal writing platform BriefCatch announced Thursday its acquisition of WordRake, a legal editing company based in Washington. Financial terms of the acquisition were not disclosed in the press release.

Founded in 2012, WordRake provides legal professionals with editing capabilities in Microsoft Word and Outlook including making suggestions for clarity in sentences and identifying unnecessary words in legal writing, according to a press release announcing the transaction.

In its time, WordRake has held several partnerships including Suffolk University Law School in 2021 and with LexisNexis back in 2016.

BriefCatch founder and CEO Ross Guberman told Legaltech News that, since it launched, WordRake has revolutionized automation for legal editing.

"When they went to market, they were the first entity, I believe, in the country if not the world, to edit with automated track changes, which might not seem impressive in 2026, but was a true innovation at the time," Guberman said. "They did have a head start in taking ... natural language processing patterns and productizing them long before we were around."

With the acquisition, BriefCatch hopes to integrate with WordRake's editing capabilities to build on its existing analysis of legal writing structure and further support legal professionals.

"WordRake was, by design, not gen AI-powered, and we are very much moving that way. We're able to take a lot of the brilliance of their own engine and integrate it into our own road map in a way that would've been more difficult on our own," Guberman said. "They started earlier in a different technological world, so they had to do things that in the long run are really valuable because when you don't have machine learning and gen AI, you actually have to figure out the hard way how to write effectively."

The acquisition announcement follows shortly after BriefCatch announced in December that it raised $6 million in a Series A funding round led by software-focused growth equity firm Full In. In 2023, Brief Catch's parent company Law Catch Inc. announced that it received $3.5 million seed funding round led by TIA Ventures that would be used to help BriefCatch expand its team and add new features.

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Perspective

Further Thoughts of the Remand of 'Miller v. McDonald'

BY WILLIAM M. PINZLER

On Dec 8, 2025, the Supreme Court vacated the judgment in *Miller v. McDonald Commissioner* et al, 130 F.4th 258 (2d. Cir 2025) and remanded it for further consideration in light of *Mahmoud v. Taylor,* 606 US 522 (2025). This is a very distressing action by the Supreme Court.

Potentially, it allows the religious beliefs of the few to alter the scope of vaccine protection for the many. While the courts have been generous in supporting religious minorities in its decisions in free exercise cases, these cases rarely affect the day to day lives of people outside of the plaintiff's religion, or endanger their health or indeed, public health.

However, the court's insistence of "protecting" these religious beliefs has spread beyond tolerating the religious rights of the few and affecting the rights of non-religionists.

Recently, the court recognized the right of a football coach in a small Washington town to pray at mid-field in a public display of faith, when he could have prayed on the sideline in thanks that no one was injured during the high school football game. *Kennedy v. Bremerton School District*, 597 U.S. 507 (2022), held that "we are aware of no historically sound understanding of the Establishment Clause that begins to '(make) it necessary for government to be hostile to religion' in this way".

Vaccines have always been a matter of controversy. The COVID pandemic caused some to question why they must be vaccinated, especially when so many loud voices objected to mask mandates, required distancing and the avoidance of public gatherings.

Even though the COVID vaccine was developed in record time, scores of groups, ranging from religionists to libertarians to contrarians of all types objected to the mandatory vaccination program in most states.

Prior to the COVID pandemic, no one seriously questioned the efficacy of vaccines or the appropriateness of communities to demand vaccination among children and adults. Now such views are rampant, especially from the Department of Health and Human Services.

The intersection of religious freedom and public health is a topic of controversy, particularly in the context of vaccination mandates, although I suggest it should not be so complicated.

The First Amendment protection of the freedom of religion is not an absolute right. It ensures that laws are uniformly applied without specifically targeting or exempting religious practices. This means that laws, such as vaccination mandates, apply uniformly and do not specifically infringe on anyone's rights or religious preferences.

While some argue about whether infringements of religious beliefs should be tolerated by the State, because freedom or religious worship is a hallmark of America, I suggest that people are asking the wrong question. Religions, all of them are based on faith and belief, but not fact. Facts are that diseases can kill, maim and damage everyone, regardless of their status, in life, rich or poor, black or white, immigrant or native born. Vaccines work. They have rid the earth of diseases that killed thousands in previous generations. How can facts compete with belief?

It is well recognized that vaccines are essential to maintain the safety and health of the public. They help to prevent the spread of diseases and ensure community immunity. Vaccines have played a pivotal role in global health by successfully combating numerous infectious diseases such as influenza, polio, and measles. For over two centuries, vaccines against deadly diseases have contributed to public health. They have greatly decreased the burden of infectious diseases, including mortality rates. Child deaths have declined by over 50% in the last thirty years due to vaccines.

In 1905 in *Jacobson v. Massachusetts*, 197 US 11 (1905), the plaintiff challenged the state's smallpox vaccination mandate and refused to be vaccinated. He claimed that the vaccination mandate deprived him of his personal liberty.

The court dismissed the idea of a vaccination exemption based solely on personal choice, and it stated that allowing such an exemption "would practically strip the legislative department of its function to care for the public health and the public safety when endangered by epidemics of disease. Such an answer would mean that compulsory vaccination could not, in any conceivable case, be enforced in a community, even at the command of the Legislature.... We are not prepared to hold that a minority,…may thus defy the will of its constituted authorities, acting in good faith for all, under the legislative sanction of the State."

However, the court also noted that requiring certain individuals to be vaccinated, specifically those with particular health conditions, would be cruel and inhumane. The court stated, "General terms should be so limited in their application as not to lead to injustice, oppression or absurd consequence. It will always, therefore, be presumed that the legislature intended exceptions to its language which would avoid results of that character."

> The intersection of religious freedom and public health is a topic of controversy, particularly in the context of vaccination mandates, although I suggest it should not be so complicated.

Many years after this pivotal ruling, the Supreme Court heard the landmark case of *Sherbert v. Verner*, 374 U.S. 398 (1963). In this case, the court established the strict scrutiny standard to evaluate laws that could infringe on the Free Exercise Clause.

Adeil Sherbert, a member of the Seventh-day Adventist Church, was fired from her job after she refused to work on Saturday, the Sabbath Day of her faith. The Employment Security Commission ruled that she could not receive unemployment benefits because her refusal to work on Saturday constituted a failure without good cause to accept available work. Under South Carolina law, employers were not allowed to require employees to work on Sunday.

This standard was further solidified in *Wisconsin v. Yoder*, 406 US 205 (1972) where the Supreme Court applied the strict scrutiny standard in a similar context to examine a law that burdened the free exercise of religion.

Jonas Yoder and Wallace Miller, both members of the Old Order Amish religion, and Adin Yutzy, a member of the Conservative Amish Mennonite Church, were prosecuted under a Wisconsin law that required all children to attend public schools until age 16. The three parents refused to send their children to such schools after the eighth grade, arguing that high school attendance was contrary to their religious beliefs.

Decades later, the legal framework surrounding religious exemptions took a significant turn with the Supreme Court's ruling in *Employment Division v. Smith* 494 US 872 (1990). In *Smith*, the Supreme Court considered whether the state of Oregon could deny unemployment compensation to two individuals dismissed for using a controlled substance, peyote, for sacramental purposes. The state law prohibited the intentional possession of a controlled substance unless prescribed by a medical practitioner. The respondents, relying on the court's decision in Sherbert, contended that the law prohibiting the use of controlled substances was not applicable to them due to their religious motivation behind it.

The Supreme Court noted that it had never held that an individual's religious beliefs automatically exempt him or her from compliance with a law that is valid and falls under the State's authority to regulate.

Rather, the court noted, the history of its free exercise jurisprudence contradicts the claim that religious beliefs can automatically overrule the law. In this case, the court declined to apply the Sherbert's strict scrutiny test typically used in cases involving the Free Exercise Clause; it stated that the test involved the denial of unemployment compensation, which made it an individualized assessment.

Further, the court stated that if the test is to be applied at all, then it should be applied to all religiously motivated actions, in which case many laws would not meet the test. It asserted that such exemptions "would open the prospect of constitutionally required religious exemptions from civic obligations of almost every conceivable kind." The court held that government actions must be neutral and generally applicable, meaning that they cannot specifically target or discriminate against religious beliefs or practices.

The First Amendment does not mandate religious exemptions to vaccination policies because they are applicable to all citizens and do not target specific religious practices. The purpose of vaccination mandates is to protect the safety and welfare of the public by preventing the spread of infectious diseases.

Most contemporary religious institutions, and all of the world's major religions, advocate for medical vaccinations. They recognize the important role they play in safeguarding public health. These religions share the view that vaccination serves the common good. They emphasize the protection of life and health.

While some minority religious groups, such as the Dutch Reformed Church, the Amish and Christian Scientists, do not agree with vaccination, they stand in contrast to all of the major religious which advocate for immunization. Should these individuals, who represent a tiny fraction of the population, be given religious exemptions when the cost to the society of having so many unvaccinated is so high?

Furthermore, what measures, if any, should be taken to differentiate between those who are sincere in their religious beliefs and those who have suddenly adopted their religious beliefs because of their fear or political objection to vaccinations?

Mahmoud, the case which the U.S. Court of Appeals for the Second Circuit has been asked to examine in the vaccine context, is a free exercise case which continues the line of cases that parents have a right to control the religious upbringing of their children, even so far as to demanding changes to school curriculums.

Going back to the 20th century with cases like *West Virginia Board of Education v. Barnette*, 319 US 624 (1943) (students are not required to say the pledge of allegiance) and *Wisconsin v. Yoder*, 406 US 205 (1972) (Amish children are not required to attend school beyond the sixth grade as it would impinge on their (and their parents') religious beliefs), courts have allowed parents to impose their religious beliefs in the classroom.

In *Mahmoud*, a collective of parents in Montgomery County, Maryland challenged the schools' curriculum which integrated diverse books into the curriculum including books about race, gender and sexual orientation. The parents wanted to have notice when their children read these books and asked to have an opt out so that they can remove their children from the classroom when these books are being read.

Mahmoud represents a startling departure from the Supreme Court's historic pattern of recognizing rights within public schools while maintaining respect for the schools' mission and authority.

Beginning with *West Virginia Board of Education v. Barnette*, supra and continuing through and beyond the School Prayer Cases of the early 1960s, the Supreme Court has treated public schools as a significant place for the exercise of constitutional rights. The court did so, however, cognizant of the necessary limitations that must be imposed, lest concerns for the rights overwhelm the administration of our nation's system of public education.

In *Barnette*, the court recognized that the public schools could teach the value of patriotism, even if they could not demand recitation of the Pledge of Allegiance. In *Abington School District v. Schempp*, 374 US 203 (1963) the court took pains to emphasize that the schools could teach about religion, including study of the Bible as literature, even though they were prohibited from sponsoring worship. *Mahmoud*, it has been argued, ignores this practice of principled reconciliation of these interests.

The case involved a challenge by a group of parents to inclusion of books that include LGBTQ characters and themes in the English Language Arts curriculum for grades K–5 in the public schools of Montgomery County, Maryland.

In holding that the Free Exercise Clause requires the Montgomery County Public Schools to give parents notice and the opportunity to opt their children out of readings to which the parents object, the Supreme Court has for the first time recognized a right that will significantly disrupt the schools' curriculum.

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WILLIAM M. PINZLER *is in private practice in New York City*

Letters to the Editor

Adequate Funding of Family Courts Needed To Fix Custody Delays

The author of *Parental Rights Be Damned: The Stark Dichotomy in the NYS Legislature & Court's Approach to Parent-Child Relationships in Family Court Cases Under Articles 10 and 6* (NYLJ 1/27/26) conflates two different issues. The first is the detrimental impact of delays in custody proceedings—an issue upon which there is widespread agreement. His second point is that these delays are so detrimental because they are based on "unvetted" allegations being accepted uncritically by the court and "bolstered" by the Attorney for the Child (AFC).

His arguments rest on several key oversights, and his well-intentioned solutions to remedy unconscionable delays miss the underlying problem of underfunding. Unless there is sufficient funding for jurists to calendar cases in a timely manner, sufficient funding for AFCs and parent attorneys to appear before them, and funding for critical programs like supervised visitation, no unfunded statutory scheme will achieve the goal of the timely and equitable access to justice we all wish to see.

The purpose of interim court orders is to provide an expeditious remedy for an alleged present harm based on the best information available at a point in time. They are interim orders precisely because not all of the evidence is before the court at the onset of a proceeding. There is no failure of the system in this judicial construct. The systemic failure occurs when the time between interim orders and final determinations is separated by months and even years of calendar delays caused by chronic underfunding.

Mr. Katz also asserts that the Attorney for the Child merely "bolsters" unvetted information. In fact, AFCs zealously advocate based on their client's legal position, as required by, as mandated by the Rules of the Chief Judge (22 NYCRR 7.2), while also obtaining all the information they can glean from their client and collateral sources.

While the statutory changes Mr. Katz offers may have merit, they cannot be implemented until the systemic underfunding and overburdening of our Family Court system is addressed. Attention must be paid to solutions to the root causes of these delays. Any successful reform must begin with adequately funded judicial resources, and AFC offices and assigned counsel panels that are fully and fairly funded to meet the needs of litigants who seek equity and justice when they walk through the doors of the NYS Family Courts.

Glenn Metsch-Ampel
is executive director at Lawyers for Children, a non-profit organization providing legal representation and social services to children in foster care. **Karen J. Freedman** *is founder and president of the organization.*

'Miller'

« Continued from page 6

Mahmoud stretches to a remarkable extent the court's 1972 decision in *Wisconsin v. Yoder*, which held that the Free Exercise Clause requires a state to exempt members of the Amish community from compulsory-education laws once their children reach the age of 14.

The emphasis in Yoder was on the character and lengthy history of the Amish community. In the decades since then, American courts have seen *Yoder* in that light and applied it narrowly. *Mahmoud* dramatically transformed its significance.

The court decided in favor of the parents, finding that the parents' right to free exercise of religion was unduly burdened by the state's failure to provide notice of the books being read and when the books were being read.

> No religious belief, no matter how sincerely held, should be determined to be sufficient to overcome the universally recognized advice that vaccines prevent diseases.

The court also held that the state had failed to provide them with a right to remove their child from the classroom when they have a "religious" objection to a book being read. These claims of religious objection are the parents' objections, not the child's. While parents have the right to bring up their children as they wish, are there any limits to how far the parents can go before the State is allowed to intervene and deny the parents demands? Those limits will be tested in the remand of *Miller*.

Miller is a vaccination case. The case is about the constitutionality of Section 2164 of the New York Public Health Law, which repealed New York's religious exemption for childhood vaccination for school attendance. That statute, the Second Circuit held is "neutral on its face." It did not target or affirmatively prohibit religious practices.

The law simply applied the New York school immunization requirements to all schoolchildren who do not qualify for a medical exemption.

The court held that the act of repealing the religious exemption does not itself "transmute" this otherwise neutral one into one that targets religious beliefs citing *We the Patriots, Inc. v. Conn. Off of Early Childhood Dev.*, 76 F.4th 130, 149 (2d Cir. 2023).

Applying the free exercise precedent to vaccination cases would call into question all vaccination statutes that do not permit a religious exemption. It is very bad policy. The free exercise cases are about individuals, often from fringe groups, who challenge the state's laws in that they impact on their wish to control their religious beliefs and the religious upbringing of their children. While these cases are not absolute, the courts have done their utmost to accommodate sincere claims of infringement, because in part, it affects so few.

Vaccination cases are different. When children are not vaccinated, the disease spreads. All children who are not vaccinated, including those for whom there was a medical exemption are at risk from a community of unvaccinated children. Also, children who come down with the disease for which they should have been vaccinated become a burden for the state. They require isolation. Many require medical treatment or hospitalization and the State must bear the costs of their "religious" exemption.

Diseases that had vanished have reappeared, largely in religious communities which oppose vaccination. Measles and polio, to name just two are now back when they had all but disappeared. In fact, they were never eradicated, only controlled by universal vaccinations. Now, their return threatens everyone.

Any reason for not vaccinating children should be seriously challenged and in communities, like the Amish community in Rochester who were the plaintiffs in *Miller*, there is no question that the community's desire to claim an infringement on their religious beliefs have injured and will injure their children and the community of which they are a part, and will have an impact on the medical resources of the community which serves the Amish community in Rochester.

So, on remand, the Second Circuit must come to terms with the conflicts between sound and indeed indisputable public health advice and the claim of the impact on the religious observance of the plaintiffs. Without doubting for a moment the sincerity of the religious beliefs of the plaintiffs, no religious belief, no matter how sincerely held, should be determined to be sufficient to overcome the universally recognized advice that vaccines prevent diseases, including diseases that primarily affect children and protect them, their children, and the rest of us.

If the court allow books to be banned (or removed by the desire not to offend parents) from my children's school, I can go out and buy them for my own child. However, when you eliminate the vaccination requirement parents have no way to protect their own children from measles and the rest of the diseases for which they are vaccines, when unvaccinated children get them (and statistically they will) which means the courts are permitting other parents to impose their ideology on the families of vaccinated children and those with medical exemptions.

So the choice for the Second Circuit is straightforward. Will they allow for faith to replace science? Will they allow beliefs, which are sincere, but personal and not universal to affect an entire community? The science is clear. Vaccines work. While children who have legitimate medical exemptions (certified by physicians) have a right to be exempt from the requirement of childhood vaccinations (and these are a very tiny number), no one else should be exempt.

No religion and no religious leader should be allowed to subject their children and their community to the childhood diseases that vaccines have essentially eliminated. The damage to the children, to the community and the medical establishment that treats them, in my view, firmly outweighs any modest infringement of the parents' religious beliefs.

It is time for the courts, especially the Supreme Court, to restore the balance between science and religion. Religions no matter how sincere should not be allowed to endanger our communities. Allowing for religious exemptions to be handed out to anyone who says it violates his or her religion is an abdication of public duty. In my view there should be no religious exemption to vaccines, regardless of how sincere or misguided the applicant is. Religion is about faith. Faith will not cure diseases. Vaccines and medicines do.

Transportation

« Continued from page 3

that the order compelling arbitration should be vacated because their contracts were "contracts of employment" that were excluded from the scope of the FAA pursuant to the §1 exemption.

Recognizing the issue in *Silva* as one of first impression in the Second Circuit, the panel ruled that the contracts at issue were contracts of employment even though they were executed by the truck drivers in their capacities "as presidents of their respective corporations." The Second Circuit rejected the distributor's argument that the contracts at issue were "akin to 'franchisor-franchisee' or 'supplier-distributor' relationships" that should be interpreted as falling outside the scope of the §1 exemption. Disregarding form and looking to the substance of the transactions, the Second Circuit found that the truck drivers in *Silva* were clearly transportation workers and the contracts in question called for the provision of the type of truck-driving work that Congress intended to include with the scope of the exemption set forth in §1 of the FAA, regardless of the fact that contracts took the form of agreements between corporations.

With the Silva ruling, the Second Circuit joins with the Third, Ninth, and Tenth Circuits in concluding that last-mile delivery drivers qualify as transportation workers engaged in interstate commerce. The split between these circuits and the Fifth Circuit likely will be resolved by the Supreme Court given its grant of certiorari in the Fifth Circuit's decision in *Brock v. Flowers Foods, Inc.* At the time of publication, the appeal in that case is currently set to be heard by the Supreme Court in March 2026.

The *Silva* ruling is a reminder to practitioners that despite the strong policy in favor of enforcing arbitration agreements, the scope of enforcement under the FAA is not unlimited and courts are not afraid to overlook form and analyze substance to interpret the text of the FAA as precluding enforcement of arbitration contracts in cases involving transportation related workers. The scope of such limitations on enforcement can and will have significant impacts on employers, even where those employers are not directly involved in the transportation industry. The claims in *Silva* and the other last-mile cases were brought as class actions. Interpreting the §1 exemption to cover these types of claims would result in these cases proceeding under ordinary class procedures in federal court, whereas interpreting the exemption the other way would result in these cases being directed to arbitration.

Lawyers

« Continued from page 3

again that when lawyers learn to work with their anxiety, rather than being driven by it, they often become not only healthier, but more effective. They think more clearly, communicate more skillfully, and recover more quickly from inevitable stress.

Anxiety doesn't have to be the price of admission to a successful legal career. You don't have to choose between excellence and wellbeing. With the right tools, you can harness what anxiety does well, and gently quiet it when it stops serving you.

And that, in my experience, is not a loss of edge. It's a gain in agency.

Calendar

TUESDAY FEB. 17

NY State Bar (CLE)
Truth about Succession Planning: What High-Performing Leaders Do Differently
nysba.org/events/the-truth-about-succession-planning-what-high-performing-leaders-do-differently/
1 CLE credit
Virtual

NY State Bar (Non CLE)
NYSBA Mediator Roundtable Series
nysba.org/events/nysba-mediator-roundtable-series-february-2026-edition/
Informational event
Virtual

NY City Bar (Non CLE)
Fortune Hunters and Their Prey: Murdered Wives and Inheritance in Midcentury America
6 p.m. – 7 p.m.
Registration Link: https://services.nycbar.org/EventDetail?EventKey=HIST021726&mcode=NYLJ
Location: 42 West 44th Street
Contact: 212-382-6663 or customerrelations@nycbar.org

WEDNESDAY FEB. 18

NY State Bar (CLE)
Employment Law 2026: Emerging Trends and Regulatory Shifts Across Federal, State and City Levels
nysba.org/events/employment-law-2026-emerging-trends-and-regulatory-shifts-across-federal-state-and-city-levels/
1 CLE credit
Virtual

NY State Bar (Non CLE)
The Tax Drag of NYC: Advanced Wealth Management Strategies for New Yorkers
nysba.org/events/the-tax-drag-of-nyc-advanced-wealth-management-strategies-for-new-yorkers/
Virtual

NY City Bar (CLE)
Current Legal Ethical Issues with Professor Stephen Gillers
12 p.m. - 1:45 p.m.
2 CLE credits
Registration Link: https://services.nycbar.org/EventDetail?EventKey=_WEB021826&mcode=NYLJ
Location: Zoom

THURSDAY, FEB. 19
FRIDAY, FEB. 20

NY City Bar (CLE)
Trade Secrets Symposium 2026: Navigating the Law of Trade Secrets and Restrictive Covenants
Day 1: 9:00 am – 1 p.m.
Day 2: 9:00 am – 1 p.m.
Day 1 CLE credits: 4
Day 2 CLE credits: 4
Both Days CLE credits: 8
Both Registration Link: https://services.nycbar.org/TradeSecrets/Registration.aspx?EventKey=_WEB0219B&mcode=NYLJ
Day 1 Registration Link: https://services.nycbar.org/TradeSecrets/Registration.aspx?EventKey=_WEB021926&mcode=NYLJ
Day 2 Registration Link: https://services.nycbar.org/TradeSecrets/Registration.aspx?EventKey=_WEB022026&mcode=NYLJ
Location: Zoom
Contact: 212-382-6663 or customerrelations@nycbar.org

Practising Law Institute
Negotiating Commercial Leases 2026
9 a.m. – 4:30 p.m. (Both Days)
www.pli.edu/programs/negotiating-commercial-leases/

FRIDAY, FEB. 20

NY City Bar (Non CLE)
Pathways to Law: CUNY & NYC Bar Career Exploration Event
2 p.m. – 5:30 p.m.
Registration Link: https://services.nycbar.org/EventDetail?EventKey=DEIB022026&mcode=NYLJ
Location: 42 West 44th Street
Contact: 212-382-6663 or customerrelations@nycbar.org

MONDAY, FEB. 23

Practising Law Institute
Corporate Governance – A Master Class 2026
9 a.m. – 5 p.m.
www.pli.edu/programs/corporate-governance/

TUESDAY, FEB. 24

NY City Bar (CLE)
Effective Mediation Advocacy: Skills and Strategies for Litigators
9 a.m. - 11 a.m., 2 CLE credits
Registration Link: https://services.nycbar.org/EventDetail?EventKey=EMA022426&mcode=NYLJ
Location: Zoom
Contact: 212-382-6663 or customerrelations@nycbar.org

TUESDAY FEB. 25

NY State Bar (CLE)
The Attorney's Guide to ABLE Accounts
nysba.org/events/the-attorneys-guide-to-able-accounts/
1 CLE credit
Virtual
The End-of-Life Journey With Our Beloved Animals – Session 3 (of 3)
nysba.org/events/the-end-of-life-journey-with-our-beloved-animals-session-3/
1 CLE credit
Virtual

NY State Bar (Non CLE)
Young Lawyers Section Monthly Pub Night
nysba.org/events/young-lawyers-section-monthly-pub-night-february-2026/
Free Event
In Person

NY City Bar (CLE)
Introduction to the Surrogate's Court: Litigation
1 p.m. - 4 p.m.
3 CLE credits
Registration Link: https://services.nycbar.org/EventDetail?EventKey=_WEB022526&mcode=NYLJ
Location: Zoom
Contact: 212-382-6663 or customerrelations@nycbar.org

WEDNESDAY FEB. 26

NY State Bar (CLE)
Lost Wills and Trusts
nysba.org/events/lost-wills-and-trusts/
1 CLE credit
Virtual
Risk Management 2026
nysba.org/events/risk-management-2026/
4 CLE credits
Virtual

NY State Bar (Non CLE)
Sounding the Alarm: Ethics for Attorney Mediators and Arbitrators
nysba.org/events/sounding-the-alarm-ethics-for-attorney-mediators-and-arbitrators/
Virtual

NY City Bar (Non CLE)
Lunch with Justice Lillian Wan
1 p.m. - 2:30 p.m.
Registration Link: https://services.nycbar.org/EventDetail?EventKey=LIT022626&mcode=NYLJ
Location: 42 West 44th Street
Contact: 212-382-6663 or customerrelations@nycbar.org

NY City Bar (CLE)
Best Practices To Avoid a Legal Malpractice Claim
2 p.m. - 3 p.m.
1 CLE credit
Registration Link: https://services.nycbar.org/EventDetail?EventKey=_WEB022626&mcode=NYLJ
Location: Zoom
Contact: 212-382-6663 or customerrelations@nycbar.org
High-Stakes Cybersecurity & Privacy Settlements: Key Drivers, Dynamics, and Resolutions
6 p.m. - 7:30 p.m.
Reception 7:30 p.m. - 8 p.m.
1 CLE credit
Registration Link: https://services.nycbar.org/EventDetail?EventKey=arb022626&mcode=NYLJ
Location: 42 West 44th Street
Contact: 212-382-6663 or customerrelations@nycbar.org

THURSDAY. FEB. 26
FRIDAY, FEB. 27

Practising Law Institute
Advanced Licensing Agreements 2026
8:50 a.m. – 5:15 p.m. (Day 1)
9 a.m. – 4:30 p.m. (Day 2)
www.pli.edu/programs/advanced-licensing-agreements/

FRIDAY, FEB. 27

NY City Bar (CLE)
Acquiring Third-Party Evidence to Prove Your Case at Trial
9:00 am - 12 p.m.
3 CLE credits
Registration Link: https://services.nycbar.org/EventDetail?EventKey=_WEB022726&mcode=NYLJ
Location: Zoom
Contact: 212-382-6663 or customerrelations@nycbar.org

TUESDAY, MARCH 3

NY State Bar (Non CLE)
Company Counsel Conundrum: Litigation or Arbitration
nysba.org/events/company-counsel-conundrum-litigation-or-arbitration/
New York City

TUESDAY,MARCH 3
WEDNESDAY, MARCH 4

NY State Bar (CLE)
Commercial Litigation Academy
nysba.org/events/commercial-litigation-academy-2026/
16 CLE credits, Hybrid: NYC

WEDNESDAY, MARCH 4

New York County Lawyers Association
2026 Annual Gala Honoring the Judiciary
Pierre Hotel, 6 p.m.

FRIDAY, MARCH 6 ,13, 20, 27

NY State Bar (Non CLE)
Mindful Moments
nysba.org/events/3-6-26-mindful-moments-weekly-group/
Virtual

TUESDAY, MARCH 10

NY State Bar (Non CLE)
Bright Ideas Coffee Hour
nysba.org/events/3-10-26-bright-ideas-coffee-hour/
Virtual
Building an ADR Practice: Thoughts and Advice from the Trenches
nysba.org/events/building-an-adr-practice-thoughts-and-advice-from-the-trenches/
New York City

WEDNESDAY, MARCH 11

NY State Bar (CLE)
AI, GAI, Agentic AI, What Attorneys Need to Know: Lunch and Learn
nysba.org/events/ai-gai-agentic-ai-what-attorneys-need-to-know-lunch-and-learn-series-3/
1 CLE credit
Virtual
New York's Horseshoe Crab Harvest Ban: The Legal and Legislative Path to Protection for a Keystone Species
nysba.org/events/new-yorks-horseshoe-crab-harvest-ban-the-legal-and-legislative-path-to-protection-for-a-keystone-species/
1 CLE credit
VirtualNY State Bar (Non CLE)
Breaking the Manager Ceiling: for Women Navigating Advancement, Influence and Visibility in the Legal Profession
nysba.org/events/breaking-the-manager-ceiling-for-women-navigating-advancement-influence-and-visibility-in-the-legal-profession/
Virtual

TUESDAY, MARCH 17

NY State Bar (CLE)
AI and the Law with ALIS: Down the Rabbit Hole with ALIS: The Ethics of AI and Professional Responsibility
nysba.org/events/ai-and-the-law-with-alis-down-the-rabbit-hole-with-alis-the-ethics-of-ai-and-professional-responsibility-part-1/
1 CLE credit
VirtualNY State Bar (Non CLE)
NYSBA Mediator Roundtable Series
nysba.org/events/nysba-mediator-roundtable-series-march-2026-edition/
Virtual

WEDNESDAY, MARCH 18

NY State Bar (CLE)
Basics of Mediation
nysba.org/events/basics-of-mediation/
1.5 CLE credits, Virtual

FRIDAY, MARCH 20

NY State Bar (CLE)
Basics of Mortgage Foreclosures
nysba.org/events/basics-of-mortgage-foreclosures-2/
1.5 CLE credits, Virtual

TUESDAY, MARCH 24

NY State Bar (CLE)
Managing Difficult Clients and Colleagues: Protecting Your Mental Health and Well-Being
nysba.org/events/managing-difficult-clients-and-colleagues-protecting-your-mental-health-and-well-being/
1 CLE credit, Virtual

WEDNESDAY, MARCH 25

NY State Bar (CLE)
Interference with Expectancy of an Inheritance: Florida and New York Perspectives
nysba.org/events/interference-with-expectancy-of-an-inheritance-the-florida-and-new-york-perspectives/
1 CLE credit, Virtual

Counsel

« Continued from page 5

after extensive post-training fine-tuning.

• Knowledge Distillation: The definition also captures models produced via "knowledge distillation"—where a smaller student model learns from a larger teacher model—if the distillation process itself uses significant compute (benchmarked at roughly $5 million in associated costs). This prevents developers from evading regulation by "laundering" capabilities into smaller architectures.

2. Frontier Developer (The Base Tier)

A 'Frontier Developer' is defined simply as any person who trains or initiates the training of a Frontier Model. Crucially, there is no revenue threshold for this base definition. A well-funded startup, a non-profit research lab, or other organization that trains a 10^26 FLOPS model is a 'Frontier Developer' and subject to specific statutory duties discussed below.

3. Large Frontier Developer (The Enhanced Tier)

The Act reserves its most burdensome requirements for Large Frontier Developers. Under Section 1420(10), this is defined as a Frontier Developer that, together with its affiliates, had annual gross revenues in excess of $500 million in the preceding calendar year.

This revenue threshold, which aligns New York with California's Transparency in Frontier Intelligence Act (TFAIA), creates a regulatory sandbox for high-growth, pre-revenue AI labs. However, the "affiliate" aggregation rule prevents major tech conglomerates from spinning off AI divisions into separate entities to avoid the "Large" designation.

Universal Obligations: What Applies to All Frontier Developers?

It is a misconception that the RAISE Act only regulates "Big Tech." While "Large" developers face the heaviest burden, all Frontier Developers—regardless of revenue—must comply with three critical provisions effective Jan. 1, 2027.

1. The 72-Hour Incident Reporting Rule

Section 1422(3) requires that any Frontier Developer must report a "critical safety incident" to the Office of AI Transparency of the DFS (the Office) within 72 hours of determining that an incident has occurred or learning facts sufficient to establish a reasonable belief thereof.

A "critical safety incident" includes unauthorized access to model weights (model theft), the model facilitating a cyberattack or weapon creation, or the model evading human control. This 72-hour window is significantly stricter than California's 15-day default, making New York the pacesetter for global incident response timelines. Counsel for smaller AI labs must ensure their clients have 24/7 incident response capabilities, as a missed deadline constitutes a violation.

2. Transparency Reports

Under Section 1421(3), all Frontier Developers must publish a "Transparency Report" before deploying a new frontier model. This report must disclose the model's intended uses, known limitations, supported modalities, and acceptable use policies. While manageable, this requirement effectively mandates a "System Card" for every deployed model.

3. Prohibition on False Statements

Section 1421(4) explicitly prohibits any Frontier Developer from making "materially false or misleading statements" regarding the catastrophic risks of their models or their compliance with safety standards. This provision empowers the attorney general to pursue enforcement actions against "safety washing"—the practice of overstating safety protocols for marketing purposes.

Enhanced Obligations: The 'Large Frontier Developer' Regime

For entities exceeding the $500 million revenue threshold, the RAISE Act imposes a comprehensive governance regime.

1. The Frontier AI Framework

Section 1421(1) requires Large Frontier Developers to implement and publish a "Frontier AI Framework." This is not merely a policy document; it is an operational safety constitution. The Framework must detail how the developer handles each of the following:

1. Standards: Adoption of national (NIST) and international (ISO) safety standards.
2. Risk Thresholds: Specific metrics used to identify "catastrophic risk".
3. Mitigations: Safeguards applied to address identified risks (e.g., refusal mechanisms, circuit breakers).
4. Deployment Review: The internal governance process for authorizing deployment.
5. Third-Party Assessment: Utilization of external red teams or auditors to validate risk assessments and mitigations.
6. Framework Updates: Protocols for updating the Framework annually or upon "substantial modification" of a model.
7. Cybersecurity: Protocols to secure unreleased model weights from theft and proliferation.
8. Incident Response: Procedures for identifying and reporting "critical safety incidents."
9. Internal Governance: Corporate structure ensuring compliance, including designation of senior personnel with clear accountability.
10. Internal Use Management: Assessing risks from the developer's own internal use of the model—preventing "lab leaks" where dangerous capabilities are exploited within the organization before deployment controls are in place.

> A smaller developer that fails to report a critical safety incident could, for example, face a court order shutting down their operations in New York, a consequence far more severe than a monetary fine.

Federal Equivalency (Section 1422(8-9))

To reduce regulatory fragmentation, the Act allows compliance via federal standards. If the office designates a federal regulation (e.g., from the US AI Safety Institute) as "substantially equivalent," developers may declare their intent to follow the federal rule. However, they must send copies of federal reports to the office concurrently. This creates a pathway for eventual federal preemption while maintaining state oversight during the transition period.

2. Quarterly Internal Risk Reporting

Unlike the reactive reporting required of smaller developers, Large Frontier Developers must submit confidential quarterly reports to the DFS summarizing catastrophic risk assessments resulting from internal R&D. This gives the regulator near-real-time visibility into the capabilities of next-generation models before they are released to the public.

3. Registration and Fees

Large Frontier Developers must file a formal registration statement with the DFS and pay an annual assessment fee. These fees are designed to fund the Office of AI Transparency, ensuring the cost of regulation is borne by the industry's largest players rather than taxpayers or startups.

Enforcement

The enforcement provisions of the RAISE Act, found in Section 1427, contain a textual nuance that counsel must navigate carefully.

The attorney general holds exclusive enforcement authority; there is no private right of action, which shields developers from consumer class action lawsuits based directly on the statute. The Act authorizes civil penalties of up to $1 million for a first violation and $3 million for subsequent violations.

However, Section 1427 specifically states that the attorney general may bring an action to recover these penalties "where a large frontier developer fails to publish... or fails to report an incident." The text does not explicitly authorize these specific dollar-figure penalties against non-large Frontier Developers.

This creates an apparent enforcement gap where smaller developers have statutory duties (e.g., incident reporting) but may not face the specific statutory fines listed in Section 1427. Counsel should not interpret this as immunity. The attorney general retains broad powers under General Business Law §349 (deceptive acts and practices) and common law equity to seek injunctive relief or disgorgement against any entity violating state law. A smaller developer that fails to report a critical safety incident could, for example, face a court order shutting down their operations in New York, a consequence far more severe than a monetary fine.

Strategic Roadmap: Preparing for 2027

While the substantive obligations do not take effect until Jan. 1, 2027, the complexity of the RAISE Act requires immediate preparation.

1. Conduct a Compute Audit

Counsel should work with technical leadership to calculate the cumulative compute budget for all models currently in training or slated for development in 2026. Determine if any model approaches the 10^26 FLOPS threshold. Remember to include compute allocated for post-training fine-tuning.

2. Determine "Large" Status

Analyze the corporate structure. Because the $500 million revenue threshold aggregates "affiliates," a subsidiary AI lab may be regulated as a "Large Frontier Developer" based on its parent company's revenue.

3. Gap Analysis of Safety Governance

For Large Frontier Developers, compare current Responsible Scaling Policies (RSPs) against the statutory requirements of the Frontier AI Framework. Most voluntary RSPs will need significant revisions to meet the specific requirements of Section 1421.

4. Build the 72-Hour Protocol

For all Frontier Developers, establish an incident response protocol distinct from standard data breach procedures. This team must be capable of technical triage and legal determination within 72 hours. This is the tightest reporting window in the U.S. and will likely become the global default for companies operating in New York.

Conclusion

The enactment of the RAISE Act's Chapter Amendments marks a milestone in the maturation of AI regulation in the United States. The grace period until Jan. 1, 2027 is not a time for complacency, but for construction of frameworks, procedures, and governance structures that the land demands.

By moving away from the blunt instrument of a deployment ban and toward a sophisticated regime of transparency and risk management, New York has created a viable compliance path for the industry. However, the obligations are rigorous. For legal counsel, the task ahead is to build the internal compliance architecture that allows innovation to proceed while satisfying the exacting standards of the Empire State.

AI

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now is that firms should have far less comfort as to how co-counsel's work was produced. The underlying responsibility is the same; the information asymmetry is greater."

Moving forward, Siegel opined that attorneys will begin having more of these conversations as a result of the numerous cases where lawyers have found themselves in hot water over AI mishaps. He noted that not only is an attorney's reputation on the line, but disciplinary action and potential malpractice are as well. Siegel said that while some disciplinary authorities, such as those in Pennsylvania, have taken a hands-off approach, it is only a matter of time that lawyers begin facing disciplinary action.

"When it gets to a point where a disciplinary authority disciplines someone, that's going to be a game changer also," Siegel said. "Disciplinary counsel knows all about AI, and judges know about it. So you have to assume at some point that's going to be a major issue."

Fellow Pennsylvania attorney Jennifer Ellis, who consults with and advises lawyers on legal ethics and AI, echoed that it isn't necessarily technology that is the problem, but rather a lack of competence from attorneys who fail to check their work.

"The issue is not the technology; it's how people are using it," Ellis said. "Whenever people get in trouble, it's because they're not doing their job."

"The fundamental resolution to this is, one, training on AI, so that people understand that you cannot just trust it. Any fact you pull from AI, no matter the AI, you need to confirm it," Ellis continued. "You need people to understand the positives, the negatives, what it can do, what it can't do, what its limitations are."

Ellis also stressed the importance of disclosure and written policies that provide clear expectations.

"When you bring in associated counsel, or when you decide to collaborate with counsel, you should have some sort of written agreement that spells out your mutual obligation, because you are obligated to choose appropriate counsel to work with," Ellis said, noting it is an attorney's responsibility to know what tech they're using, as well as what their co-counsel is using.

"I have never seen so many lawyers get in trouble in such a short period of time because of how they're using technology. And it's extraordinary, but I guess if you reflect on it, not that surprising, if you don't understand the technology you're using and its limitations. And because it does speak so confidently, it's easy to trust," Ellis said.

Smaller Firms, Bigger Headaches

These issues can be particularly acute for smaller firms, which often lack the internal resources to formulate explicit AI use policies on their own, increasing the risks that an attorney may have used a tool improperly, or without adequate concern for verifying outputs.

"You have lawyers who are trying to be lawyers, they're trying to run a business, and now they're trying to also be technologists, and it's just too much," said Tyler Brown, a partner at Levantage AI Advisors and CEO of ZAF Legal, an alternative business structure personal injury firm.

The lack of detailed policies can make it challenging for firms to describe exactly how they plan on using gen AI over the course of the case, increasing the need for ongoing communication and clear expectations. On the flip side, inquiring about AI use takes on even greater importance for firms that lack established internal policies for verifying citations produced by co-counsel.

While Brown said he thought it would be unfair for courts to discipline attorneys for fillings they had not explicitly joined or signed off on, he added that the extension of sanctions to attorneys who had signed off on erroneous work from a co-counsel would mirror how courts have treated breaches of the duty of care under pro hac vice arrangements.

"Many, but not all, states impose joint liability to all co-counsel attorneys from a legal malpractice standpoint. Extending professional discipline liability to co-counsel could be argued to be in the same vein," he noted. "Lawyers need to be cautious about things that they are signing their name to."

Terms of Use

Attorney Rebecca Delfino, an associate law professor at LMU Loyola Law School who teaches courses regarding generative AI and legal practice, agreed that attorneys do not seem to be disclosing their AI usage with each other, but said they should be.

"Its fast becoming apparent that everyone is using these and that people are not asking each other about it," Delfino said, stressing the importance of speaking with co-counsel, law clerks and even expert witnesses on the topic.

Delfino shared that attorneys should incorporate terms regarding gen AI usage into their agreements with clients, as well as with other attorneys. She noted that such terms can be worked into disclosures and agreements that are already being drafted as these relationships are reached.

Delfino opined that there will be developments in the space that eventually require disclosures to clients and co-counsel.

"The expectation is going to be that lawyers, when you associate with someone or your name is going to appear on the pleading, that now it's going to be part of the routine conversation. You know, like, 'what are you using?' Because you're going to be on the hook for it," Delfino said, pointing to a bill currently sitting in the California legislature, Senate Bill 574, which would require attorneys to disclose gene AI usage to attorneys and courts, and verify the accuracy of all materials produced with AI.

According to Delfino, the bill would require every attorney whose name appears on a pleading to guarantee that the law cited is accurate, with violators being subject to sanctions and/or disciplinary action.

"I love these technologies, I would never recommend that people not use them because I think that they do help in so many different ways, but at the end of the day, we can't give over our law license to that technology," Delfino said. "And what I mean by that is by just adopting what it says as gospel. You're still going to have to go and check those cases."

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AI Docs

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Rakoff did not issue a written opinion accompanying his oral bench order.

Heppner, represented by counsel from Quinn Emanuel Urquhart & Sullivan, stands accused of misappropriating more than $150 million while serving as chairman of publicly-traded company GWG Holdings, Inc. Heppner allegedly moved the funds through a shell company he controlled, Highland Consolidated Limited Partnership, according to the Department of Justice's indictment.

Federal law enforcement arrested Heppner in Dallas, Texas on Nov. 4 and charged him with securities fraud, wire fraud, conspiracy to commit securities fraud and wire fraud, false statements to auditors, and falsification of records.

Prior to his arrest, the defendant asked Anthropic's Claude AI tool about the federal government's investigation of him. He then shared the information he learned with his defense counsel at Quinn Emanuel. The documents containing these records were discovered on electronic devices seized by the Federal Bureau of Investigation when Heppner was arrested.

In December, the government and Heppner's defense counsel mutually agreed to segregate the AI-generated documents from the evidence available to the prosecution, since the question of privilege was still open.

In a court document detailing a Feb. 2 conversation between counsel for both sides, Heppner's defense attorneys from Quinn Emanuel contended his AI searches were privileged, since he used the tool to prepare reports for the purposes of attorney-client discussion. Furthermore, Quinn Emanuel counsel said they did not direct Heppner to run these AI searches.

Last Friday, the DOJ filed a motion to remove privilege protections from Heppner's legal documents, arguing the documents were not communications between an attorney and client, the information was voluntarily shared with an AI tool, documents can't gain retroactive privilege by being given to counsel and the work product doctrine doesn't shield materials created by a non-attorney through their own independent research.

Heppner's defense counsel did not file a response to the DOJ's motion before Rakoff's Tuesday bench order.

Lead counsel for Heppner, Benjamin O'Neil of Quinn Emanuel, did not respond to phone calls and emails requesting comment.

Assistant U.S. Attorney Daniel G. Nessim declined to comment on Rakoff's order and referred inquiries to Nicholas V. Biase, Chief Public Information Officer for U.S. District Court for the Southern District of New York. Biase did not immediately return a request for comment.

Heppner's trial in U.S. District Court for the Southern District of New York is set to begin on April 6.

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Plugin

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company already has plugins for Word, Google and other software.

"We will build on top of it and [we are] evaluating that now. At the end of day, these are commodities like the LLMs themselves," Leah president and chief technology officer Anurag Malik said in an email.

As for contract drafting and negotiation platform Spellbook, depending on the needs of its customers, the company would also consider developing an extension for Cowork as it already provides custom features for OpenAI's ChatGPT and plugins in Microsoft Word.

"What we would be considering is we have a very unique AI tool for doing contract review based on real-time proprietary data flow of contracts that we see in 80 countries. ... At the same time, I think [the legal plugin] is ultimately limited," Spellbook co-founder and CEO Scott Stevenson said. "[Our customers] want to be using us in other places too, so our goal is get to wherever our users are. If our users want to use Claude, we'll go there."

Only customers of Claude currently have access to the legal plugin in Cowork, and Pramata's extension is available only to its customers who also have access to Claude.

Adding another plugin could come at a cost to customers, who would pay not only for the plugin, but also access to Claude, on top of their subscription to the legal tech platform.

Schweisberger said that although the legal tech space will certainly get more overwhelming for users with the addition of different add-ons for Claude and the legal plugin, he hopes users narrow down the tools they need to solve their core conflicts around legal work.

"It's very overwhelming these days, and I think it's really tough to sift through," he said. "When I advise clients, it boils down into the core use cases that they're trying to solve and then the right tooling for that. ... We serve a different purpose than an industry benchmarking solution, which serves a different purpose than matter management. But I do think in the realm of contracts intelligence, you probably will just have one."

The interest in integrating Claude's plugin represents a more positive outlook for the tool's impact on the legal industry. Even after Anthropic's plugin news spurred a drop in legal tech stocks, observers like Baretz + Brunelle partner Joe Borstein took an optimistic view.

Borstein explained that as legal technology has become more advanced since generative AI emerged, its capabilities for legal work have become sophisticated enough that "legal technology is moving up the value chain together with generative AI." And the introduction of the legal plugin in Claude Cowork could contribute to the increase in value.

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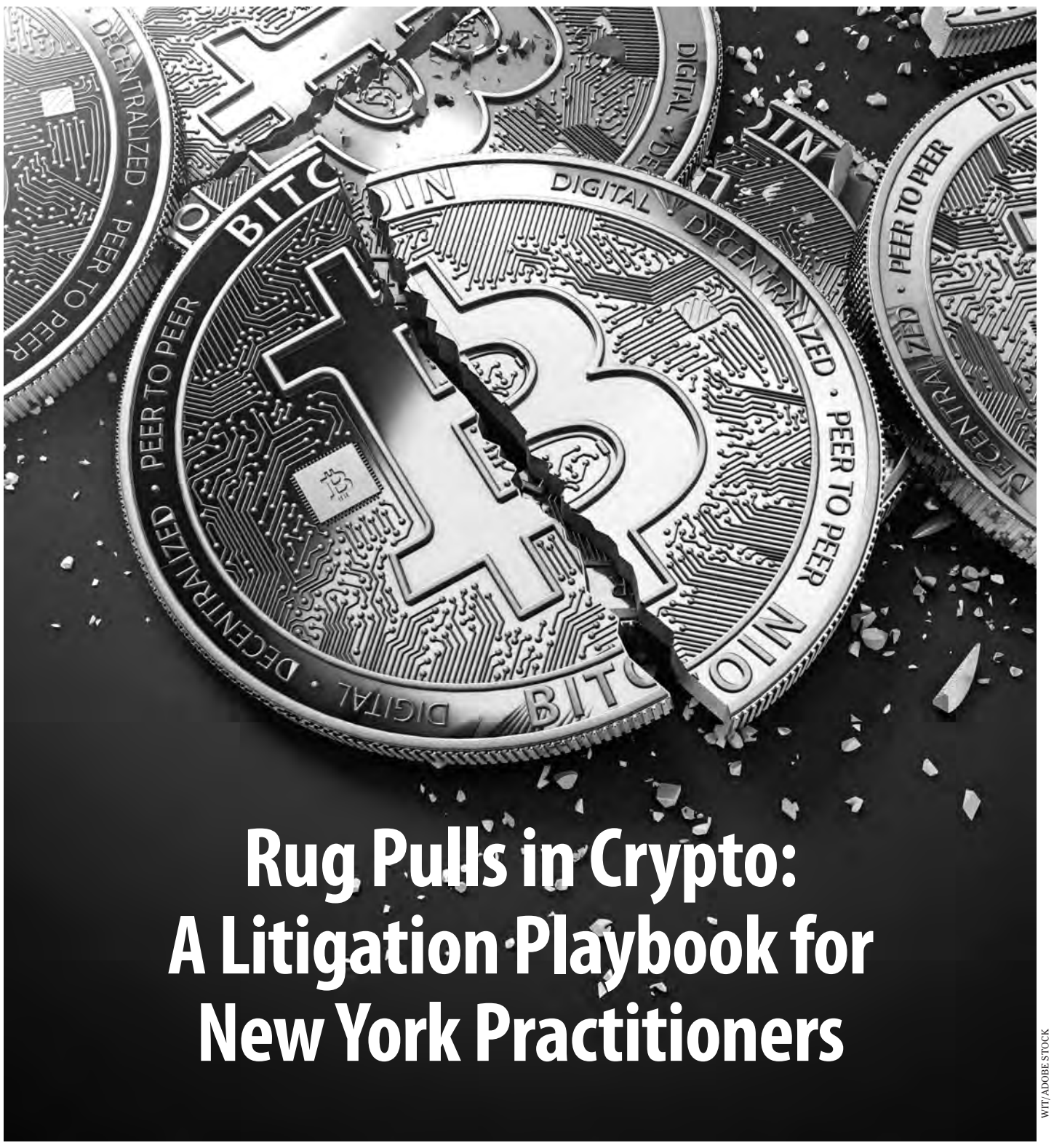
Litigation



Rug Pulls in Crypto: A Litigation Playbook for New York Practitioners

WIT/ADOBE STOCK

BY ERIC LANTER

Rug pulls, increasingly common in the crypto industry in the past several years, are another version of the exit scam. In an exit scam, the scammer creates the illusion of a legitimate business, makes promises to others (such as customers or investors), and then disappears with the funds received.

What Are Rug Pulls?

In the crypto industry, the exit scam has become known as the "rug pull," as scammers pull the rug out from under the investors in a token. Rug pulls have proliferated in the cryptocurrency market and have presented challenges for regulators and law enforcement agencies to address. There are three common types of rug pulls.

The first type consists of the organizers removing liquidity from the token's pool instantly and therefore withdrawing all value from the token.

The second type of rug pull occurs when the organizers build hidden functions into the token's code that allow them to drain funds or block users from exiting the token.

The third type of rug pull is when the token's creators inflate a token's price—often by promoting it with an influencer or with a flashy ad campaign—and then, once the veneer of a burgeoning token has been established, the creators dump their holdings, leaving the investors with a valueless token.

The rug pull typically becomes clear when there is a massive loss in the token's value without a prior announcement of any planned liquidity "rebalance." Those who orchestrate a rug pull regularly insist they had no knowledge that the token would lose value to the extent it did, and that outsiders must have been responsible for it, implying that the organizers are also victims. Although such situations, where a new token quickly loses liquidity, are possible, there are key indicators present in the documentation of the token that can tend to show it was a rug pull.

> Common law claims such as breach of contract, unjust enrichment, fraud, and aiding and abetting fraud **may be viable claims** against the organizers of a rug pull.

These are the circumstances under which law enforcement and regulation have sought to gain a foothold.

Enforcement and Regulation Are in Flux

Federal investigators and enforcement agencies, a state attorney general's office, or a local district attorney may investigate claims of rug pulls and potentially file civil claims or criminal charges against the organizers of the rug pull. Those enforcement actions, if taken, may assert claims sounding in fraud, seek to recover the funds, and potentially see that victims receive some restitution for their losses. States are also grappling with criminalizing rug pulls.

In New York, there is proposed legislation (Assembly Bill A6515A) criminalizing rug pulls and defining rug pulls as: "the act of a developer with respect to a class of virtual tokens where such developer, with intent to defraud: (I) creates material misrepresentations or omissions regarding the development, utility, or intended purpose of the virtual tokens; and (II) subsequently sells a significant portion of their token holdings or abandons the project without delivering the promised functionality or utility, causing a substantial loss in token value primarily as a result of such actions rather than general market conditions."

That proposed legislation, proposed in March 2025, is currently at the committee stage. Although victims may choose to report a rug pull to federal, state, or local authorities, New York law provides tools that victims can use to pursue the organizers of a rug pull.

Claims Under New York Law

New York law provides powerful remedies for victims of rug pulls both in common law and statute.

Victims may assert claims grounded in New York law against the organizers of the rug pull as part of an effort to recover the lost money, regardless of or in addition to whatever investigative and enforcement actions come from federal or state agencies or a district attorney's office.

Common law claims such as breach of contract, unjust enrichment, fraud, » Page 12

ERIC LANTER *is counsel in Offit Kurman's Commercial Litigation Practice Group.*

Tax-Efficient Charitable Giving At Death: Issues Requiring Consideration

BY ALISON POWERS HERMAN AND KAREN SCHIELE

For individuals seeking to leave meaningful charitable legacies, properly structuring testamentary gifts can significantly enhance both philanthropic impact and tax efficiency. In planning charitable legacies, individuals may easily overlook the complex rules governing estate tax charitable deductions, efficient asset selection, and trust structures.

Understanding these intricacies is essential to ensure charitable goals are fulfilled while maximizing tax benefits for estates and heirs.From ensuring certainty of bequests to selecting optimal assets and structures, each decision point can significantly impact both the charitable organization's benefit and the estate's tax position. This article examines the key considerations for structuring tax-efficient charitable gifts at death.

Securing the Estate Tax Charitable Deduction

For estates exceeding federal or state estate tax exemption thresholds, it is important to secure an estate tax charitable deduction when making a charitable bequest. The federal estate tax exemption is currently $15 million for decedents dying in 2026, and is scheduled to increase annually with inflation. For states that impose their own estate tax, estate tax exemptions vary widely—New York has a $7.35 million exemption for decedents dying in 2026 with a punitive "cliff" provision, while Connecticut aligns with the federal exemption.

Qualified Recipients

For a transfer at death to qualify for the charitable estate tax deduction, the recipient of the transfer must qualify as an organization described under IRC Section 2055(a) at the time of death of the decedent from whom the transfer is received. Unlike the income tax charitable deduction, the estate tax charitable deduction is available for bequests made to foreign charities, and the estate tax charitable deduction is available regardless of public charity versus private foundation status. Best practice includes conditioning bequests on the recipient's qualification under IRC Section 2055(a), and providing for alternative dispositions if such qualification is lost.

Certainty of Bequest

In addition to the recipient organization being described under IRC Section 2055(a), for a charitable bequest to qualify for the charitable estate tax deduction, the transfer must be directly from the decedent with certainty that an ascertainable amount will pass to charity. Discretionary language disqualifies the deduction. For example, "such amounts to such charitable organizations as my executors determine" fails to qualify for the estate tax charitable deduction because the amount that will go to charity is uncertain, remaining in the discretion of the executors to decide after the decedent's death.

However, "one-half of my residuary estate to such charitable organizations as my executors determine" succeeds in qualifying for the deduction because the amount that will go to charity is ascertainable without exercise of discretion by anyone else even though specific recipients are not identified. Similarly, formula clauses which define the value of what is to be transferred to a charity with reference to ascertainable amounts likewise succeed to achieve an estate tax charitable deduction.

KIRSTEN DAVIS/PEOPLEIMAGES/ADOBE STOCK

Valuation Requirements

Depending on the type of asset that is contributed to charity, different valuation methods apply to determine the amount of a charitable estate tax deduction. Cash and marketable securities have readily ascertainable values, but real estate, business interests, art, and other non-liquid assets require qualified appraisals, which must be sub- » Page 12

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Building **Retail Resilience** Through **Affirmative Recovery** Strategies

BY AVIVA WILL AND ALYX PATTISON

Retailers are under increasing strain from compressed margins, vulnerable supply chains and evolving consumer behavior—prompting General Counsel to reassess how they safeguard enterprise value and reinforce resilience amid heightened volatility.

Retailers Facing a Shifting Operating Environment

Across the many discussions at this year's Retail Industry Leaders Association (RILA) annual conference, one message resonated throughout: The retail sector is confronting a growing array of complex challenges.

Having led a session at the conference, we saw firsthand how tariffs, and their knock-on effects on margins, sourcing and consumer demand, are intensifying pressures that retailers have long faced. Even well-capitalized organizations are finding the operating landscape more demanding. Against this backdrop, retail GCs and CFOs should view affirmative litigation and recovery initiatives not as reactive legal measures, but as strategic tools for financial resilience.

Managing Financial and Operational Pressures

Tariffs have introduced instability into global supply chains, driving uncertainty in cost structures. Simultaneously, rising logistics and transportation expenses have made it harder for retailers to absorb higher costs or pass them on in a market where consumers are increasingly price conscious.

Inflation has compounded these difficulties. Labor, freight and goods have all become more expensive, while consumers facing elevated living costs are cutting back on discretionary purchases. As essential spending consumes more of household budgets, retailers are left with limited pricing flexibility.

Together, these dynamics are putting sustained pressure on margins across much of the retail landscape. Ongoing supply chain disruptions and uncertainty persist as industries continue to feel the secondary effects of tariff-driven sourcing shifts. Volatility in global manufacturing and shipping further reduces » Page 13

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Inside

LITIGATION: Jade Lopez, Sections Editor | Monika Kozak, Design

Post-Chevron Chaos: Courts Split On Whether **Texts** Are **'Calls'** Under The **TCPA**

WAQAS/ADOBE STOCK

BY HILARY SIMON AND SETH MANGER

For decades, courts, regulators, and businesses largely operated under a stable assumption about the Telephone Consumer Protection Act (TCPA). If a company sent unsolicited text messages to a consumer whose number was on the National Do Not Call (DNC) Registry, those messages could expose the sender to liability under the statute's Do Not Call provisions.

That assumption rested not on the statute's text, but on Federal Communications Commission (FCC) interpretations that treated text messages as the functional equivalent of telephone calls.

That stability is now gone.

In the wake of the Supreme Court's decisions in *Loper Bright Enters. v. Raimondo*, 603 U.S. 369 (2024), and *McLaughlin Chiropractic Assocs., Inc. v. McKesson Corp.*, 606 U.S. 146 (2025), district courts are no longer required to defer to the FCC's interpretations when deciding civil TCPA cases. Instead, they must decide for themselves what the statute means, using ordinary principles of statutory interpretation. Once courts began doing that, a fundamental question moved from the background to the foreground: when Congress prohibited certain "telephone calls" in 1991, did it also prohibit text messages that did not yet exist?

Courts are now answering that question in sharply different ways. The result is a growing and consequential split that has immediate implications for pleading standards, motion practice, settlement valuation, and compliance planning. The same conduct that may be dismissed at the pleading stage in one jurisdiction may proceed into expensive discovery and class certification battles in another.

The statutory provision at issue is Section 227(c)(5) of the TCPA, 47 U.S.C. §227(c)(5). It creates a private right of action for any person whose number is registered on the National Do Not Call Registry and who "has received more than one telephone call within any 12-month period by or on behalf of the same entity" without consent or a qualifying business relationship. When Congress enacted this provision in 1991, SMS text messaging did not exist.

Rather than amending the statute as technology evolved, Congress left the text unchanged. In the meantime, the FCC issued regulatory guidance stating that text messages should be treated as calls for certain TCPA purposes. For many years, courts largely treated that guidance as effectively controlling.

That framework has now been dismantled. In *Loper Bright*, the Supreme Court eliminated Chevron deference. In *McLaughlin*, the court held that district courts in TCPA enforcement actions are not bound by agency interpretations and must independently determine the meaning of the statute, giving agency views only such respect as their reasoning warrants. *McLaughlin Chiropractic Assocs., Inc. v. McKesson Corp.*, 606 U.S. 146, 155–56 (2025).

Once that shift occurred, defendants began arguing that the words "telephone call" should be given their ordinary meaning as of 1991, and that text messages therefore fall outside Section 227(c)(5). Several courts have accepted that argument. In *Jones v. Blackstone Med. Servs., LLC*, 792 F. Supp. 3d 894 (C.D. Ill. 2025), the court held that text messages are not telephone calls for purposes of the Do Not Call provision. The court focused on the ordinary public meaning of the statutory language at the time of enactment and reasoned that Congress could not have intended to regulate a technology that did not yet exist. The court also emphasized that Congress had amended other portions of the TCPA without amending Section 227(c)(5), which it viewed as confirming that the provision's scope had not been expanded by statute.

Courts in Florida soon followed. In *Davis v. CVS Pharmacy, Inc.*, No. 3:25-cv-231, 2025 WL 2491195, at *1 (N.D. Fla. Aug. 26, 2025), the court concluded that "no ordinary person would think of a text message as a 'telephone call,'" and held that the statutory text, read according to its original public meaning, foreclosed the claim. In *Sayed v. Naturopathica Holistic Health, Inc.*, No. 1:25-cv-214, 2025 WL 2997759, at *2 (M.D. Fla. Oct. 24, 2025), the court adopted the same reasoning, emphasizing that "the statutory text here is clear" and that the omission of any reference to text messages confirms that Section 227(c)(5) applies only to actual calls.

Other courts, however, have gone the other way.

In *Wilson v. Skopos Fin.*, LLC, No. 3:25-cv-812, 2025 WL 2029274 (D. Or. July 21, 2025), the court rejected the argument that texts fall outside the statute and reasoned that the TCPA's purpose of protecting consumer privacy would be undermined by excluding a now-dominant form of telephonic communication. The court also relied on the FCC's longstanding guidance and the overall structure of the statute.

> For businesses and insurers, the **compliance implications** are equally significant. It would be a mistake to assume that these decisions reduce **TCPA risk** in any uniform way.

A court in California reached a similar result in *Wilson v. Medvidi, Inc.*, No. 5:25-cv-1441, 2025 WL 2856295 (N.D. Cal. Oct. 7, 2025), concluding that nothing in the text, structure, or purpose of the TCPA supports a rigid distinction between written and oral communications.

Most notably for New York practitioners, the Southern District of New York adopted this approach in *Wilson v. Better Mortg. Corp.*, No. 1:25-cv-9173, 2025 WL 3493815 (S.D.N.Y. Dec. 5, 2025). There, the court reasoned that a "telephone call" in 1991 was best understood as a communication made by phone, and that text messages, which are sent and received by phone, fall within that concept. The court drew support from *Mujahid v. Newity, LLC*, No. 25 C 8012, 2025 WL 3140725 (N.D. Ill. Nov. 10, 2025), which relied on dictionary definitions and the structure of the TCPA as a whole.

For litigants, this uncertainty has immediate procedural consequences. In jurisdictions following *Jones, Davis*, and *Sayed*, defendants have a powerful threshold argument that can dispose of Do Not Call claims at the motion to dismiss stage. In jurisdictions following *Skopos, Medvidi,* and *Better Mortgage*, the same argument is likely to fail, and the case will proceed into discovery.

That divergence also complicates class action risk assessment. A nationwide texting campaign that might generate little exposure in one set of jurisdictions could produce substantial liability in another. Forum selection, removal strategy, and early motion practice now matter more than ever.

For businesses and insurers, the compliance implications are equally significant. It would be a mistake to assume that these decisions reduce TCPA risk in any uniform way. If anything, they make the risk more uneven and harder to model. Companies that operate nationally cannot safely tailor their practices to the most permissive jurisdictions, because plaintiffs will continue to file in forums that take the broader view. Insurers, in turn, will have to evaluate TCPA exposure with greater attention to venue, pleading theories, and circuit-level trends.

In this environment, conservative compliance planning remains the only rational course. That includes continuing to treat text messages as fully regulated under the TCPA, maintaining rigorous consent documentation, and closely monitoring Do Not Call compliance and reassigned number protocols.

At the same time, defense counsel should be reevaluating early motion strategies. In the right jurisdictions, the statutory argument that texts are not calls may be dispositive. In others, it may still serve to frame the case, preserve issues for appeal, or influence settlement posture.

More broadly, these cases reflect a deeper shift in the legal landscape. After *Loper Bright* and *McLaughlin*, regulated industries can no longer assume that agency interpretations will stabilize statutory meaning. The meaning of a statute may now vary by jurisdiction and even by district.

Eventually, Congress or the Supreme Court may resolve this question. Until then, the TCPA's Do Not Call provision will remain a moving target. In a post-Chevron world, statutory text, not regulatory gloss, is once again the battleground. For businesses, insurers, and litigators alike, that means more forum dependence, more front-loaded risk analysis, and more uncertainty than the TCPA landscape has seen in decades.

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Second Circuit En Banc Review: Inching Upward?

RYLAND WEST/ALM

BY JOSEPH PALMORE AND ALISON HUNG

Is the Second Circuit's famous hostility to rehearing appeals en banc softening? We ran the numbers and now conclude the answer is yes... but only a bit.

When a federal court of appeals rehears a case en banc, the full court takes over from a panel of three judges. As commentators and judges alike have observed, the Second Circuit has historically heard the fewest cases en banc of any circuit "by a substantial margin," both in absolute terms and relative to the size of the court's docket. *United States v. Taylor,* 752 F.3d 254, 255 n.1 (2d Cir. 2014) (Cabranes, J., dissenting from denial of rehearing en banc).

The court's reluctance to convene en banc, which some have traced to Judge Learned Hand, reflects the court's "longstanding tradition of general deference to panel adjudication." *Ricci v. DeStefano*, 530 F.3d 88, 89-90 (2d Cir. 2008) (Katzmann, J., concurring in denial of rehearing en banc). Defenders of this tradition observe that it conserves judicial resources (by limiting cases in which the entire court must participate) and promotes a "high level of collegiality" (by avoiding polarizing intra-court disputes over the work of three-judge panels). Jon O. Newman, *Foreword: In Banc Practice in the Second Circuit,* 1989-93, 60 Brook. L. Rev. 491, 502-03 (1994).

This approach has not been without its critics, most notable among them Justice Ruth Bader Ginsburg, who served as Circuit Justice for the Second Circuit. In remarks at the Circuit's 2002 Judicial Conference, Justice Ginsburg noted that Second Circuit decisions often appeared in circuit splits resolved by the Supreme Court that term. She gently suggested that the Circuit might be "a bit too resistant to en banc rehearing" and could make better use of that process to keep its cases out of the Supreme Court. Remarks by Justice Ginsburg, 221 F.R.D. 38, 223 (2002).

Justice Ginsburg's efforts were not successful. From 2002 to 2010, the Second Circuit decided a grand total of seven appeals en banc, less than one a year. Mario Lucero, Note, *The Second Circuit's En Banc Crisis*, 2013 Cardozo L. Rev. De Novo 32, app. tbl. 1. And from 2011 through mid-2016, the Second Circuit managed to find an even slower pace, deciding only *two* appeals en banc. Martin Flumenbaum & Brad S. Karp, *The Rarity of En Banc Review in the Second Circuit,* 256 N.Y.L.J. 38 (Aug. 24, 2016). That later figure paled in comparison to the corresponding numbers in its sister circuits: for example, the Sixth Circuit went en banc in 17 cases during the same period, and the Ninth Circuit in 40 cases.

So how has the court approached en banc review in the decade since? We reviewed its en banc decisions to find out.

Cases Decided En Banc

From the second half of 2016 through 2020, the deceleration remarkably continued, with the court deciding only *one* appeal en banc: *Zarda v. Altitude Express, Inc.*, 883 F.3d 100 (2d Cir. 2018). (The court decided one case en banc in May 2016: *United States v. Ganias*, 824 F.3d 199 (2d Cir. 2016).) But in the most recent five-year period, from 2021 to 2025, that number surged in comparison to the preceding five-year period. The court decided six appeals en banc over the last five years: *Francis v. Kings Park Manor, Inc.*, 992 F.3d 67 (2d Cir. 2021); *United States v. Weaver,* 9 F.4th 129 (2d Cir. 2021); *United States v. Scott*, 990 F.3d 94 (2d Cir. 2021); *Soule v. Connecticut Association of Schools,* 90 F.4th 34 (2d Cir. 2023); *Farhane v. United States*, 121 F.4th 353 (2d Cir. 2024); and *United States v. Maiorana*, 153 F.4th 306 (2d Cir. 2025).

> For example, a judge may use a **dissent to signal** to the Supreme Court and litigants that **the issue warrants further review**.

Of course, in absolute terms, six en banc decisions in five years—and eight decisions in ten years—are still very low numbers, especially when compared to the en banc numbers of some other circuits. The Sixth Circuit, for example, decided 38 cases en banc over the last decade. Colter Paulson, *Ten Years of En Banc Decisions in the Sixth Circuit,* Squire Patton Boggs Sixth Circuit Appellate Blog (Sept. 26, 2025). And in January 2026 alone, the Fifth Circuit beat the Second Circuit's five-year en banc output, hearing a remarkable seven cases en banc just that month. Jacqueline Thomsen, *Full Fifth Circuit Faces 'Unprecedented' Sitting With Big Cases,* Bloomberg Law (Jan. 20, 2026). But the trend in the Second Circuit over the past two five-year periods suggests that the active judges of today's court may have a slightly greater appetite for going en banc than their 2011-2020 counterparts.

As to subject matter, all eight cases that the court reheard en banc over the past ten years involved criminal or civil rights law. Although the sample size is small, that suggests that those litigating in these two areas may have a better shot than others of getting en banc review.

Dissents From and Concurrences in Denials of Rehearing En Banc

In the overwhelming majority of cases, rehearing en banc is denied without explanation or comment. But in the Second Circuit, as elsewhere, such denials occasionally prompt dissenting and concurring opinions.

Such opinions provide a vehicle for a judge to explain why (in the case of a dissent) that judge disagrees with the decision not to go en banc—usually on the grounds that the original panel decision was wrong, and the issues presented are of "exceptional importance," Fed. R. App. P. 40(b)(2)(D)—or (in the case of a concurrence) vice versa.

But a judge authoring a dissent may have additional goals and specific audiences in mind. For example, a judge may use a dissent to signal to the Supreme Court and litigants that the issue warrants further review. (Litigants that have lost before a Second Circuit panel may have incentive to file a rehearing petition even though the likelihood of a grant is low because securing such a dissent from denial can provide helpful support for a petition for a writ of certiorari.) In some cases, a judge might even use a concurrence to convey that the original panel's decision was so wrong, and the issue presented so important, that bypassing en banc rehearing is necessary to allow the Supreme Court to review the issue sooner. In one such concurrence, Judge Lohier explained that "the better course... is for the Supreme Court to grant certiorari and reverse" because "[i]t can do so faster than we can, and it alone can forestall the spread of this grievous error." *New York v. U.S. Dep't of Just.*, 964 F.3d 150, 155-56 (2d Cir. 2020) (Lohier, J., concurring in the denial of rehearing en banc).

Some Second Circuit judges use these opinions to express views on the en banc process itself—or even the propriety of opinions on whether to take a case en banc. In one such opinion, then-Chief Judge Jacobs described the court's en banc practice as "so rusty and cumbersome that its desuetude will allow a single panel to skate past full court review." *Zhong v. U.S. Dep't of Just.*, 489 F.3d 126, 139 (2d Cir. 2007) (Jacobs, C.J., dissenting from denial of rehearing en banc). And last year, Judge Nathan observed: "Although any member of our court might have something they deem worthy of saying about a matter on which they are not on the panel, doing so while bypassing the process and ignoring the high standard for rehearing en banc is profoundly disruptive to our work." *Öztürk v. Hyde,* 155 F.4th 187, 206 (2d Cir. 2025) (Nathan, J., concurring in denial of rehearing en banc). Along similar lines, Judge Pooler once lamented that "the simple tactic of calling for an en banc poll" had become a way for active judges to "provide themselves with an opportunity to opine on a case that was never before them." *United States v. Stewart*, 597 F.3d 514, 519 (2d Cir. 2010) (Pooler, J., concurring in denial of rehearing en banc).

Conclusion

Given the Second Circuit's deep and longstanding cultural aversion to en banc review, it is likely to remain a national outlier for the foreseeable future. But recent trends suggest it may be ever-so-slowly moving more toward the mean. And whether or not that happens, individual judges are likely to continue using the en banc process to offer additional opinions on the work of Second Circuit panels—or on the en banc process itself.

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Strategic Litigation Empowers Mayor Mamdani to Advance Policy Goals

BY ANYA FREEDMAN, LI YU, SARAH SCHMIDT AND REBECCA TEMKIN

New York City Mayor Zohran Mamdani has emphasized that protecting consumers and combating unfair business practices will be core policy pillars of his administration's affordability and economic justice agenda. Strategic affirmative litigation offers a powerful tool for advancing the mayor's ambitious policy agenda.

This article first reviews how local governments across the country have used affirmative litigation to hold powerful corporate interests accountable to local communities. Applying these lessons, we then explain how New York laws empower the city to deploy this historically underutilized tool to benefit all New Yorkers.

Affirmative Litigation Has Been a Powerful Consumer Protection Tool for Local Governments

In recent years, local government agencies across the United States have pursued impactful affirmative litigation. The examples below may serve as models for the mayor's administration.

In California, the City Attorneys for both Los Angeles and San Francisco have successfully litigated consumer protection actions against major corporations. In 2022, the City and County of San Francisco, partnering with outside counsel, prevailed at trial on its public nuisance claim against Walgreens, which alleged the pharmacy chain "knowingly engaged in unreasonable conduct that was a substantial factor in contributing to the opioid epidemic in San Francisco." *City & Cnty. of San Fran. v. Purdue Pharma L.P.*, 620 F. Supp. 3d 936, 938 (N.D. Cal. 2022).

In 2016, the City of Los Angeles obtained a $150 million judgment against Wells Fargo in a consumer fraud case filed a year earlier by the City Attorney's Office. In that case, Los Angeles alleged that Wells Fargo had "victimized customers by using pernicious and often illegal sales tactics" in violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§17200 *et seq*. That statute grants local public agencies broad enforcement power, on behalf of the People of California, to seek statutory penalties and other relief for unlawful, unfair, and fraudulent practices.

California state and local agencies also have teamed up on major consumer protection litigation. In 2019, the County of Los Angeles, in partnership with the California Attorney General, filed a lawsuit against the electronic cigarette maker, JUUL Labs, Inc., alleging that JUUL unlawfully targeted young people through advertising without warning about the product's risks, failed to verify the age of California consumers, and violated the privacy rights of minors. See Compl., *California v. JUUL Labs, et al.*, Case No. RG19043543 (Nov. 18, 2019), Dkt. No. 1. In 2023, the parties resolved the litigation as part of a $462 million settlement involving six states. Under this settlement, the County of Los Angeles received $46 million to fund nicotine addiction treatment and prevention, and JUUL was enjoined from targeting youth in its advertising.

In another recent example of state and local partnership, the Los Angeles City Attorney and California Attorney General litigated a federal action to protect the privacy of children online, alleging that video game developer Tilting Point Media LLC violated the California Consumer Privacy Act and the federal Children's Online Privacy Protection Act. See Compl., *California v. Tilting Point Media LLC,* Case No. 2:24-cv-05140 (C.D. Cal. June 18, 2024), Dkt. No. 1. In June 2024, the case settled with an agreement barring Tilting Point from selling or sharing data for consumers under 13 without parental consent, implementing a compliance program, and paying a $500,000 penalty.

In Maryland, the City of Baltimore has partnered with outside counsel since 2018 to pursue claims against manufacturers, wholesalers, and prescribers of prescription opioids. Baltimore asserted statutory deceptive practices claims under the Maryland Consumer Protection Act against manufacturers, and common-law public nuisance and negligence claims against manufacturers, wholesalers, and pharmacy chains. By September 2025, Baltimore had secured $579 million in settlements and judgments. Notably, Baltimore opted out of the global settlement against the same parties—even when Maryland did not—and subsequently secured far more restitution money through its independent action. *Mayor of Baltimore v. Purdue Pharma L.P.*, Case No. 24C18000515 (Md. Cir. Ct., Baltimore City).

In Illinois, the City of Chicago partnered with outside counsel in 2021 to launch a lawsuit against DoorDash, the online meal delivery company, for deceptive practices. According to the complaint, DoorDash violated Chicago's local laws by listing restaurants on its platform without their consent and deceiving consumers with misleading restaurant listings, fees, menu prices, and allocation of driver tips. DoorDash also allegedly billed a $1.50 service charge it called "Chicago Fee" to consumers, when this fee was neither mandated nor paid to Chicago. In November 2025, Chicago announced an $18 million settlement, which included restitution payments to restaurants listed on DoorDash without their consent and to eligible Chicago consumers. *City of Chicago v. DoorDash, Inc*., Case No. 1:21-cv-05162 (N.D. Ill.).

These significant outcomes underscore the potential for the mayor's administration to leverage outside counsel's expertise and resources and to work collaboratively with state and local peers to develop and successfully pursue the wide range of statutory and common-law claims available to protect consumers, local businesses, and working families.

MICHAEL NAGLE/BLOOMBERG

In recent years, **local government** agencies across the United States have pursued impactful **affirmative litigation**.

With the New Mayor's Leadership, the City Can Strengthen Its Use of Affirmative Litigation

We now turn back to New York City and the mayor's agenda. While the city's experience using affirmative litigation to achieve major consumer protection goals has been more limited, there are historical examples of state and local collaborations and outside counsel partnerships.

In 2021, for example, the New York Attorney General and New York City Corporation Counsel, in partnership with outside counsel, litigated a qui tam suit jointly against a hedge fund manager who failed to pay tens of millions of dollars in taxes to the city and the state on management and performance fees. *State of New York v. Sandell*, Index No. 101494/2018 (Sup. Ct., N.Y. Cnty.). This case settled for $105 million in back taxes and damages. According to the settlement agreement, the state and the city asserted civil fraud claims for violations of the New York False Claims Act, N.Y. State Finance Law §§187 et seq. This settlement, along with the fact that New York City promulgated its own False Claims Act, Local Law No. 53 (2005), demonstrates the breadth of the city's authority to pursue fraud claims against deceptive business practices that target city government and programs.

New York state and local laws also provide a fruitful framework for the new mayoral administration to wield the tool of affirmative litigation in innovative and powerful new ways. This includes both acting independently with the support of outside counsel and, in the right case, acting in collaboration with state and local peers in New York and across the country.

The city, for example, may bring cases against businesses for engaging in deceptive practices prohibited by New York City Administrative Code §§20–700 et seq. In *Mintz v. Am. Tax Relief, LLC*, 16 Misc. 3d 517, 837 N.Y.S.2d 841 (Sup. Ct., N.Y. Cnty. 2007), New York City Department of Consumer Affairs (now the Department of Consumer and Worker Protection) sued American Tax Relief LLC for its deceptive trade practices in violation of that local statute.

Additionally, New York municipalities may bring actions to abate public nuisances and to obtain injunctive relief. See, e.g., *City of Rochester v. Premises Located at 10–12 S. Washington St.,* 180 Misc.2d 17, 687 N.Y.S.2d 523 (Sup. Ct., Monroe Cnty. 1998). Indeed, the City has had success pursuing public nuisance claims, in combination with claims under the city's consumer protection laws, to stop marketing of "illegal, dangerous accommodations" to "unsuspecting tourists" by a short-term rental company. See, e.g., *City of New York v. Smart Apartments LLC,* 39 Misc.3d 221, 233, 959 N.Y.S.2d 890, 898 (Sup. Ct., N.Y. Cnty. 2013).

Finally, New York State recently strengthened its consumer protection laws, expanding opportunities for the new mayoral administration to use affirmative litigation to challenge unfair and abusive corporate practices in creative new ways that help working people. On Dec. 22, 2025, Governor Kathy Hochul signed into

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The Mindset Behind Successful AI Adoption In US Litigation and Investigations

BY TIM HARKNESS, ROB MCCALLUM, ERIC BRUCE AND CAMERON MACDONALD

Clients and law firms are all asking the same question: what AI tool should we be using? That's the wrong question. Successful AI adoption is not about selecting the right tool: it requires a rewired organizational mindset and workflow design.

Firms should revisit traditional workflows to develop multi-stage processes integrating different tools and appropriate human review. This will open up more complex projects to AI efficiencies. More importantly, it is essential to ensure accountability for AI outputs and mitigate regulatory concerns.

The Organizational Mindset

Law firms are increasingly realizing that integrated human and AI collaboration is the way forward. One residual barrier is cultural: the legal industry is built on evidence, proof and precedent, so it can have a binary viewpoint. This mindset says, "AI can hallucinate, so we shouldn't use it." Innovative litigators adopt a different mindset, embracing experimentation whilst understanding the need for rigorous evaluation. This mindset instead says, "AI can hallucinate, so we must have processes to verify it."

This mindset requires firms to reconsider their roles, systems, and processes. Roles shift from doing (drafting, researching), to managing (preparing context packages, setting clear prompts, and reviewing outputs). Attorneys must understand the mechanics of LLMs: how they work, what information to give them, and what their pitfalls are. This requires department-specific, hands-on training, and ongoing skills development, alongside real applications on live cases to reinforce learning. This also cannot come at a cost to legal skills and knowledge, which remain essential for effective human review. Junior attorneys now need a wider skillset than ever to bridge the gap between legal reasoning and prompt engineering.

Building AI-Enabled Workflows

Why workflows? To build workflows that truly integrate AI, firms should reconsider their processes from the ground up. A recent McKinsey report highlights that "the real value of AI is unlocked not by the technology itself, but by redesigning workflows to integrate AI capabilities at every stage of the process." McKinsey; Agents for Growth: Turning AI Promise into Impact.

Redesigned workflows have two main benefits:

(1) Ensuring Ethical Compliance. A simple but vital reason: redesigning workflows will mitigate the risk of AI errors going unchecked. The ABA's Opinion 512 requires lawyers using AI tools to maintain technological competence of the "evolving nature" of AI, including the "benefits and risks associated with relevant technology." The Opinion reminds lawyers with managerial or supervisory responsibility that they must ensure that subordinate lawyers conform to the rules, including "clear policies" on the use of AI. *ABA Comm. on Ethics and Pro. Resp., Formal Op. 512 (2024).*

IMAGEFLOW/ADOBE STOCK

Before filing a brief or sending a memorandum to a client, **human interaction to review AI output is essential**.

(2) Optimizing Efficiency. The benefits are not only in compliance. AI—especially agentic AI—is immensely powerful when used properly. Ambitious companies which expect AI to transform their businesses will try to integrate AI as much as possible across their projects to reap the greatest rewards. Doing so requires them to view AI integration through workflow design, not through one-size-fits-all tools.

Breaking it down. So, how should businesses redesign their workflows to best incorporate AI? Step one is to break down existing workflows into discrete steps, and for each step to consider the complexity and level of human interaction required. Workflow stages that involve strategy or judgment require more human interaction than document review and analysis, so should not be treated the same.

Different tools. Likewise, firms should consider which AI tool is best for each workflow stage. One of the main concerns with AI is that platforms can hallucinate information. When you need deep research, the tool needs to access the entire internet to work, but this increases the chance of errors. If you want to analyze court filings, allowing the tool open-web access could do more harm than good. Here, a better tool might use Retrieval-Automated Generation (RAG). RAG uses a closed-universe of context, relying only on documents in your firm's ecosystem and reducing the risk of hallucination. When rebuilding workflows for AI, think about the right tool or agent for the job.

Human-in-the-Loop. The most important stage in workflow redesign is establishing how the AI output will feed into the overall work product. This should involve stringent review protocols and ethical safeguards for content accuracy and regulatory compliance. To prevent errors that could result in sanctions, legal workflows should ensure Human-in-the-Loop (HITL) architecture. HITL does not mean that lawyers will have to spend just as long reviewing as they would have spent drafting. Workflows can also include AI-led quality control, such as using a second AI tool to review the output of the first, or requiring the tool to assign confidence scores to its outputs to prioritize and triage human review. Before filing a brief or sending a memorandum to a client, human interaction to review AI output is essential.

AI in US Litigation and Investigations

Some US litigators have learned about AI risks the hard way. The industry was first warned back in 2023, after a plaintiff firm was hit with a $5,000 fine for using AI to generate fake citations in an S.D.N.Y brief. The message was clear: attorneys retain a gatekeeping obligation to ensure the accuracy of their filings, regardless of who (or what) drafted them. *Mata v. Avianca, Inc.*, 678 F. Supp. 3d 443 (S.D.N.Y. 2023).

Two years later, the lesson is even more stark. In July 2025, a U.S. District Judge sanctioned three attorneys for fabricated citations in a discovery motion. The attorneys worked for a national law firm which had an AI use policy requiring independent verification of AI outputs. The court imposed a harsher sanction than previous reprimands, "account[ing] for the danger that fake citations pose" to the judicial system. The judge sanctioned not only the attorney who drafted the motion, but also the supervising

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Giving

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mitted together with a decedent's estate tax return.

Structuring Options for Charitable Bequests

Outright Bequests

Outright bequests represent the simplest approach to testamentary charitable giving, specifiable as dollar amounts, percentages, or formulas through wills, revocable trusts, or beneficiary designations.

In providing for charitable bequests, donors should be as specific as possible and ensure the accuracy of the name of the recipient charity. If the donor wishes to limit the bequest to restrict the use of the gifted funds, then consideration should be given to whether precatory language would be preferable to legally binding language, to ensure that the charitable recipient has flexibility to make the best use of the gift received. If the donor wishes to narrow the scope of how gifted funds are used, the intention for the bequest must be made clear, without inadvertently disqualifying the bequest for the charitable deduction.

Bequests to institutions could name the specific department and purpose, if that comports with the donor's wishes, but care must be exercised not to direct funds to an individual. For example, rather than "to Dr. Smith at University Hospital," the bequest should be phrased as "to University Hospital for cardiac research directed by Dr. Smith" to ensure the institution, not an individual, is the proper recipient.

Further, donors should research intended recipients before finalizing bequests. For bequests of tangible property such as artwork or real estate, donors should verify the charity's willingness and ability to accept and maintain the asset. Many charities prefer to sell donated property and use proceeds for their mission rather than maintaining collections or land. These conversations, while sometimes difficult, can prevent disappointment and ensure the donor's intentions align with the charity's capacity.

Family Involvement in Ultimate Disposition

For testators desiring family involvement in selecting recipients, bequests to private foundations and donor-advised funds offer flexibility. Private foundations allow the trustees or board members to control to which charitable purposes the funds are dedicated, but private foundations are subject to extensive regulatory requirements including self-dealing prohibitions and excess business holdings rules. Donor-advised

funds, on the other hand, offer similar flexibility in determining the ultimate charitable use of the transferred funds, though technically, once the funds are given to the donor advised fund, the sponsoring organization owns the assets and the advisors' direction as to the charitable purpose to which the funds should be distributed can be rejected.

Charitable Trusts

Charitable gifts can be made outright or via wholly charitable trusts or split interest trusts.

A wholly charitable trust is subject to the private foundation rules. Though private foundations are often structured as corporations, they can also be structured as wholly charitable trusts, and the considerations for the two are largely the same. Distributions for the ultimate charitable purpose may be made over time. As the name states, the assets of a wholly charitable trust are irrevocably dedicated to charity and no portion of a wholly charitable trust can benefit a non-charitable person.

Separate from the wholly charitable trust is the charitable split-interest trust. A charitable split-interest trust is a trust validly existing under local law in which both one or more charitable beneficiaries and one or more non-charitable beneficiaries have successive interests. Section 4947(a)(2) of the Internal Revenue Code more specifically defines split-interest trusts [as trusts (1) that are not exempt from tax under Code section 501(a), (2) where not all of the unexpired interests are devoted to a charitable purpose, and (3) which has amounts in trust for which a charitable deduction was permitted under Code section 170, 545(b)(2), 642(c), 2055, 2106(a)(2), or 2522.

Charitable split-interest trusts must conform to precise IRC Section 664 requirements. Charitable lead trusts make regular payments to charity (either an annuity or a unitrust amount) for a term with the remainder to individuals, most commonly descendants. Charitable remainder trusts make regular payments to individuals (either an annuity or a unitrust amount), with the remainder to charity. Annuity trusts pay fixed amounts annually, while unitrusts pay fixed percentages of annually revalued assets.

Charitable remainder trusts work particularly well for providing lifetime income to a surviving spouse or close friend while ultimately benefiting charity. When a charitable remainder trust names a surviving spouse as the lifetime beneficiary, the lifetime interest can qualify for the marital deduction under IRC Section 2056(b)(8) while the remainder interest qualifies for the charitable deduction.

Interest rate environments significantly impact effectiveness of charitable split-interest trusts. Low rates favor charitable lead annuity trusts by reducing the discount rate, making wealth transfer to remaindermen more efficient. Conversely, low rates disfavor charitable remainder annuity trusts. Unitrusts do not permit leveraging of interest rates because the unitrust is calculated by applying a fixed percentage to the principal value of the trust each year.

If an individual is considering creating a charitable lead trust with remainder beneficiaries who are two or more generations younger than the individual, consideration must be given to the application of the generation skipping transfer (GST) tax. For charitable lead unitrusts, GST exemption can be allocated at inception.

For charitable lead annuity trusts, GST exemption cannot be allocated until trust termination, making them less efficient for gifts to beneficiaries two generations or more below the donor's generation.

Charitable Gift Annuities

Charitable gift annuities function similarly to charitable remainder trusts but with the charity assuming immediate control and management of donated assets. The charity pays annuities to named beneficiaries for specified terms or for life, with remaining assets benefiting the charity's mission. This structure often involves less regulatory burden than trusts and may be preferable when the donor has high confidence in the charity's financial stability and management. Many established charities offer gift annuity programs with online calculators to illustrate payment amounts and charitable deductions.

Strategic Asset Selection

In addition to determining the most suitable type of charitable recipient, an individual and his or her advisors should consider the suitability of the types of assets that are subject to the charitable legacy. The income tax consequences of inheriting certain assets can make specific assets attractive options for charitable donations.

Retirement Assets

Traditional IRAs represent particularly attractive charitable bequest assets. Non-charitable heirs pay ordinary income tax on distributions from inherited IRAs, and the IRA value is included in the taxable estate, creating potential double taxation. When IRAs pass to charity, however, the charity pays no income tax due to its exempt status, and the estate receives a full charitable deduction. The optimal strategy designates retirement assets to charities while leaving non-IRA assets (which, other than IRD, discussed below, generally do not attract income tax) to individual heirs.

Income in Respect Of a Decedent

Income in respect of a decedent (IRD), governed by IRC Section 691, includes deferred compensation, uncollected wages, and bonuses earned before death but received after death. Like retirement assets, IRD items face both estate tax and income tax when passing to heirs. Charitable bequests of IRD items eliminate the income tax while generating estate tax deductions, making them more efficient charitable gifts than assets receiving a step-up in basis.

Closely Held Business Interests

If an individual wishes to make a bequest of closely held business interests to charitable organizations, careful attention to unrelated business income tax (UBIT) and excess business holdings rules is required.

UBIT applies when exempt organizations regularly conduct unrelated trades or businesses. In general, passive investment activities of an exempt organization are not considered a trade or business for purposes of the tax, but certain income and deductions that would otherwise be excluded from the scope of the UBIT must be included in the calculation because they are incurred with respect to debt-financed property.

Similar to UBIT, excess business holdings also attract a tax. Business holdings received by gift or bequest are not treated as excess business holdings for five years following receipt. For an estate, the five-year grace period from the excess business holdings rules does not begin until the holdings are actually distributed to the exempt organization subject to the excess business holdings rules.

The rules for both UBIT and excess business holdings are complicated and should be discussed with a donor before providing for a charitable legacy of business interests.

Efficient Estate Tax Allocation

Absent specific direction, state law determines estate tax allocation. Many states follow equitable apportionment, allocating taxes proportionally among beneficiaries, but typically exempt charitable bequests from tax liability. When testators vary from the default rules of statutory apportionment, careful drafting can prevent circular computation issues. If estate taxes were inadvertently directed to be paid from charitable transfers, the reduced charitable transfer would decrease the charitable deduction, increasing taxable estate and tax liability, further reducing the charitable transfer. Proper allocation clauses ensure taxes are paid from non-charitable sources, preserving full charitable deductions.

Administrative Considerations

Several states impose regulatory requirements on charitable bequests. In New York, the Charities Bureau of the Attorney General is a required interest party for any judicial accounting for estates with charitable bequests and for charitable trusts. Charitable trusts (excluding charitable remainder trusts) must register and file annual reports. Executors and trustees must understand state-specific requirements to ensure compliance and avoid distribution delays.

Conclusion

Charitable giving at death offers tremendous opportunities to support meaningful causes while achieving significant estate tax savings. When planning for testamentary charitable gifts, careful attention should be given to the language used in drafting, as well as to the selection of assets and structure of the gift, whether outright or in trust.

CHARLIZE D/PEOPLEIMAGES/ADOBE STOCK

Mamdani

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law a bill proposed by Attorney General James that effectuates the first update to New York's primary consumer protection law in 45 years.

The Fostering Affordability and Integrity through Reasonable Business Practices Act (FAIR Act) (2025-26 N.Y. Senate-Assembly Bill S8416, enacted Dec. 19, 2025) broadens enforcement beyond deceptive acts to include "unfair" and "abusive" practices and confirms the private right of action against deceptive practices and deceptive acts. During a press conference with the mayor, the attorney general described the FAIR Act as part of a "multi-level government defense in response to the needs of working families here in the city and across the state."

In conclusion, as the mayor and his team bring a new perspective and a bold agenda to New York City, they have an opportunity to strengthen the city's leadership in strategic affirmative litigation by pursuing major cases with the support of outside counsel and in partnership with other agencies. Affirmative litigation can serve as a vital governance tool—in parallel with legislative, administrative, and executive action—to deter corporate misconduct, level the playing field for compliant businesses, and deliver tangible economic justice outcomes for all New Yorkers.

AI Adoption

« Continued from page 11

attorney for failing to properly review the draft. *Johnson v. Dunn*, 792 F. Supp. 3d 1241 (N.D. Ala. 2025).

This shows two things. First, don't assume that the people you are working with fully understand the risks of AI. Having concrete workflows, including clear AI policies, is necessary, but will not be a shield if people do not apply them in practice. Second, it is no longer an excuse to be ignorant of AI risks. As the ABA's Opinion says, technical competence of AI is "not a static understanding." As AI becomes commonplace and agents develop, firms must ensure that all their attorneys know the capabilities and limitations of those tools.

Key Takeaway

Successful integration of AI should have mindset and workflow redesign at its core. As recent sanctions show, the risks of overreliance on AI tools are real. But these risks are products of flawed processes, not imperfect technology.

By shifting the organizational mindset and redesigning processes from the ground up, firms can fully harness the power of AI while maintaining the ethical standards the bar requires. This is iterative: firms should not expect AI tools to immediately replace human judgement. But by treating workflow design as a strategic priority, and being guided by evidence of AI capability, you will get ahead without compromise.

Crypto

« Continued from page 9

and aiding and abetting fraud may be viable claims against the organizers of a rug pull. Further, depending on the facts at issue, victims of a rug pull could also assert claims against the organizers for violating General Business Law § 349 and potentially New York securities laws.

Victims seeking to maximize their chances of recovering the lost funds may also consider seeking a pre-judgment attachment, a temporary restraining order, and a preliminary injunction. Seeking such relief on an expedited basis is key, as the funds are unlikely to stay put for long.

Pursuing these claims, and potentially injunctive relief, New York courts allows victims to directly seek damages against the organizers of the rug pull and can commence as soon as the victim gathers documentation of the rug pull.

Documenting the Rug Pull Remains Key

Regardless of whether victims may look to government agencies for assistance with obtaining restitution or take action themselves by commencing an action in court, it is crucially important that victims capture and maintain documentation of the rug pull.

That documentation may consist of records like transaction hashes, smart contracts, promotional statements, wallet addresses, and communications from the organizers. The promotional statements and communications from the organizers may be material on a project website, whitepapers, roadmaps, tokenomics page, social media posts, announcements, or posts or messages on Discord or messaging apps like Telegram. Screenshots of those pages and materials, while they are available, may make the difference in sufficiently documenting the rug pull. Victims should also be careful to document suspicious activities, such as when there are organizers or participants who lock chats or delete accounts.

Organizing and assembling this documentation helps victims establish the merits and substance of their claims at a time when New York courts are seeing more of this type of case, but may need education about the inner workings of crypto and rug pulls.

Taking Action in New York

For New York practitioners, there is a panoply of remedies available for victims of rug pulls. Although large-scale rug pulls may lead to investigations and enforcement actions against the organizers of a rug pull, there are tools in New York available to victims for pursuing those organizers in a potentially more nimble and targeted manner. If victims promptly take action, they may be able to trace the misappropriated funds and claw them back before they are moved beyond their reach.

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TEERAWAT/ADOBE STOCK

Retail

« Continued from page 9

flexibility, magnifying the impact of external disruptions or losses.

These conditions extend beyond operational strain; they represent material financial stress. In such constrained environments, retailers must look beyond conventional financial levers to preserve and unlock value.

Affirmative Recovery Programs: Protecting Value And Generating Returns

As organizations seek ways to reduce costs and strengthen profitability, legal teams are uniquely positioned to contribute directly to liquidity and value creation. Affirmative recovery programs, structured efforts to pursue compensation when a business has been harmed, including through well-founded plaintiff-side litigation, enable legal departments to move from cost centers to strategic contributors.

Like any large enterprise, retailers hold valuable legal claims that frequently remain unidentified or unpursued. When treated strategically, these claims can be managed and monetized like other corporate assets. However, unlike traditional assets, litigation claims are often overlooked or left unvalued. A proactive, enterprise-wide approach to identifying and pursuing these opportunities should therefore form part of a broader financial and risk management strategy. When executed effectively, affirmative recovery programs can help offset rising costs, support margins and unlock liquidity in a challenging market.

Current economic conditions only reinforce the importance of this approach. As margins narrow, recovering value from harm becomes increasingly impactful. While retailers cannot influence tariffs or inflation, they can decide whether to pursue recoveries that are rightfully theirs. Affirmative recovery initiatives often present low-risk, high-return opportunities—particularly when supported by external capital or risk-sharing arrangements. Legal finance providers such as Burford Capital offer tailored solutions aligned with a company's recovery objectives.

Case Study: Unlocking Liquidity in Practice

A regional retail company identified store rebranding as a clear growth driver, based on historical data showing strong returns through increased foot traffic and higher sales. The obstacle was access to capital. A significant portion of value was locked in an opt-out claim within an ongoing antitrust case, leaving the company unable to deploy that capital while the litigation unfolded.

Instead of waiting for a lengthy resolution, the retailer partnered with Burford to monetize part of the claim. Burford provided a $10 million advance against the company's anticipated recovery, delivering immediate liquidity without sacrificing control of the litigation or its potential upside. An illiquid legal asset was converted into usable capital.

The results were immediate and measurable. The retailer invested the proceeds in rebranding initiatives and other revenue-generating projects that would otherwise have been postponed. By unlocking value from its legal claim, the company reinvested directly into its core business rather than remaining constrained by the litigation timeline.

This example highlights a broader point: Affirmative litigation is not simply about pursuing claims—it is about unlocking value, enhancing capital efficiency and enabling timely investment where it matters most. When embedded within a broader financial strategy, affirmative recovery programs can positively impact earnings and deliver near-term value to shareholders.

Practical Steps for GCs And CFOs

Developing a successful affirmative recovery program requires a deliberate and coordinated approach. Effective programs begin with collaboration across legal, finance, procurement and compliance functions. Routine contract reviews and systematic monitoring of class action notices can surface potential recovery opportunities. Just as importantly, a company's claims strategy should align with its overall business priorities and risk tolerance. The goal is to generate consistent, predictable value, not sporadic one-off recoveries.

Knowing when to bring in external support is also critical. Legal finance can ease budget constraints and manage risk, allowing companies to pursue strong claims that might otherwise be deprioritized. Experienced advisors, working alongside legal finance partners, can help leadership teams assess, prioritize and fund complex or portfolio-level claims.

Rethinking Resilience in Today's Retail Economy

Our primary takeaway from the 2025 RILA Conference is that while the retail sector faces undeniable challenges, it is also presented with meaningful opportunities. Although macroeconomic forces remain outside retailers' control, decisions about pursuing recoverable value are firmly within it.

By adopting a proactive, strategic approach to affirmative litigation, GCs and CFOs can strengthen resilience and support financial performance. Retailers that implement affirmative recovery programs and collaborate with experienced external partners will be better equipped to navigate ongoing uncertainty—and to create value even in difficult times.

Court Calendars

First Department

APPELLATE DIVISION

CALENDAR FOR THE FEBRUARY TERM

TUESDAY, FEB. 17

2 P.M.

24/637 People v. Jonathan Cedeno
25/2246 Fields v. Junius-Liberty Development
24/3788(1) R., Danna
24/6051 Riederer v. Schulmann Properties
25/3074(2) Gray v. Nassau Life Insurance
23/2786(1) People v. Leuris Morales
23/2728(1) People v. Leuris Morales
23/2784(1) People v. Leuris Morales
25/1700 Scott & Scott v. Kaplan LLP
23/3974(2) Anonymous v. Anonymous
24/3263 Avison Young-NY v. 459 W 50 Street
25/736 Hunold v. City of NY
25/6044 Gopstein v. Vad
19/1379 People v. Tyreek M.
25/5742 Will of Lilian M. Reich
24/5294 Lexington Insurance v. NY Marine
24/7689 Stewart v. JMDH Real Estate
25/7659 Miller v. State of NY
23/2074 People v. Michael Martin
25/3504 Josey v. NYC Department of Finance

WEDNESDAY, FEB. 18

2 P.M.

21/2956 People v. Bernard Butts
25/5058 Talbert v. Tynes
25/4407 G., Jaloni
25/1520 Lackenbauer v. 162 Fifth Avenue Associates
24/6733(1) Pescales v. Pax Ventures
25/2577(1) Pescales v. Pax Ventures
23/4841 People v. Jefferey Jones
25/225 Shanghai Pearls & Gems v. Paul
24/4649 Golden Ox Realty v. Board of Managers
25/3016 Robles v. 53-63 Walton LLC
22/3832(1) People v. Askia Yaw
22/3428(1) People v. Askia Yaw
25/1311 Gamma USA, Inc v. Pavarini McGovern LLC
24/7046 Calix v. Union Theological
22/4436 People v. Jeremy Scott-Mason
25/6713 Cardenas v. Walgreens
25/4578 Estrella v. 20 Bruckner, LLC
25/4182(2) Grey v. LIC Development Owner
20/1387 People v. Athanasios Ioannidis
25/5926N King v. 8 Spruce (NY) Owner

THURSDAY, FEB. 19

2 P.M.

25/296 People v. Kwesi Prophete
25/3133 Lurie v. NYC Department of Education
24/6089 R., Zion
24/6539 Calle v. 686 Broadway Realty
25/1741 Galloway v. Arthur Clinton Housing
24/7063 Schutzman v. 19 E. 72nd Street
25/2339(1) People v. Hakim A
25/2340(1) People v. Hakim A
25/2341(1) People v. Hakim A.
24/5012 S.T.A. Parking v. Federal Insurance
25/4768 Southgate Owners Corp. v. Esposito
24/978 Graham v. City of NY
19/1433 People v. William Caruth
25/1054 Henriquez v. City of NY
24/6949 Healy v. Kruger
25/1282 Hearns v. Abeken Apartments
25/662 Staten v. City of NY
25/1111 Joyous JD Limited v. Yolanda Management
19/833(1) People v. Wesley Cooper
25/2154N Contempo Acquisition v. Dawson

TUESDAY, FEB. 24

2 P.M.

25/1448(1) People v. Angelo Torres
25/1993 Cheng v. Caban
24/2869(4) W/A., Children
25/208 Payano v. Al Nahshal
24/7722(2) Molina v. Appula Management
24/6569(1) PH-105 Realty v. Elayaan
24/6281(1) PH-105 Realty v. Elayaan
22/4349 People v. Jaquan Moore
21/1191 People v. Raul Deleon
24/4152 Kohl v. Memorial Sloan Kettering
24/6698 AS Helios LLC v. Chauhan
24/7108 Westpoint Home v. Dormify, Inc.
21/15 People v. Erica U.
24/5770 Abrams v. Abrams
18/2352 People v. Ashleigh Wade
24/6492 Walker v. City of NY
24/6858 O'Flaherty v. Columbo
25/4417 Rothman v. Rothman
21/3191 People v. Esteban Villaman Almonte
25/870N May v. Gibbs

WEDNESDAY, FEB. 25

2 P.M.

24/806 People v. Jonathan Alfonso
25/2861 Iglhaut v. City of NY
25/387 L., Esther v. Chaim L.
23/4252 Wilmington Savings v. Brown
25/2757 Serrano v. Athena Properties
21/3431 People v. Barron Williams
23/6819 People v. Anthony White
24/7212(1) Fiondella v. 345 West 70th Tenants
24/6421(1) Fiondella v. 345 West 70th Tenants
25/4773 Matter of Wells Fargo Bank v. HBK Master Fund
25/4075(2) SL 4000 Connecticut v. CBRE
24/6289 De Perez v. Fordham Valentine
24/4374 People v. Gino Sozio
24/6308 Falcao v. MTA
24/7071 HSBC Bank v. Keeling
23/3935 People v. Christopher Harrison
24/6452 Mazzurco v. Broadway 52nd
25/699 Khan v. Khan
19/4291 People v. Adelmir Oliva
25/5270N Gurney-Goldman v. Solil Management

THURSDAY, FEB. 26

2 P.M.

22/1264 People v. Tony Thames
25/4570 Castillo v. Cannon Point South, Inc.
24/7382 V., Liam
25/4913 Nazario v. Bytedance Ltd.
24/2550 Robinson v. Henderson
25/860 10839 Associates v. Big Apple E Time LLC
19/1981(1) People v. Bridgitte Ascencio
24/1557 People v. Manuel Espinoza
25/4354 Seaton v. Babad
25/894 Tower v. Structure Tone
23/3920 People v. Antonio Rodriguez
24/6477 Ortiz v. Fitzgerald
25/4260 E. M., an Infant v. Paulino
24/2903 Trzuskot v. Johnson
24/551 People v. Barron Spruill
25/1478 Menkes v. Mount Sinai Health System
24/6777 People v. Saint Robles
24/365(2) Stile v. C-Air Customhouse
23/2039(2)N Stile v. C-Air Customhouse
25/2132N Diamond Films v. TV Azteca

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The following cases have been scheduled for pre-argument conference on the dates and at the times indicated:

Renwick, P.J., Manzanet, Kapnick, Webber and Kern, JJ.

WEDNESDAY, FEB. 18

12 P.M.

31394/19 Larosa v. Diaz

TUESDAY, FEB. 24

11 A.M.

818473/22 Capellan v. 35 LLC

WEDNESDAY, FEB. 25

12 P.M.

159863/25 410 West LLC v. Chen

THURSDAY, FEB. 26

10 A.M.

655680/24 O'Sullivan & Associates v. Peconic Sunset LLC
655154/25 BLT Fund 9 v. Karasick

TUESDAY, MARCH 3

9 A.M.

653674/15 35 West Realty v. Booston LLC

10 A.M.

651268/25 Weinberg v. MCG Equity Partners

THURSDAY, MARCH 5

10 A.M.

656622/20 50 Murray St Acquisition v. Ernst Klein 6th Ave. Foods

FRIDAY, MARCH 6

9:30 A.M.

159416/22 Williams v. TopBuild Corp.

1 P.M.

650008/24 NewCo Capital Group v. MCA Resolve

MONDAY, MARCH 9

10 A.M.

29960/19 Perez v. Ali Baba City

TUESDAY, MARCH 10

10 A.M.

651397/21 Beasley v. Bayview Auto Wreckers

11 A.M.

819359/25 Fermin v. Meijia

THURSDAY, MARCH 11

10 A.M.

105170/11 Cenpark Realty LLC v. Marmelstein

MONDAY, MARCH 16

10 A.M.

653552/24 Mt. Arlington BH v. Mt. Arlington Equity

FRIDAY, MARCH 20

10 A.M.

158678/20 Buitrago v. 600 Broadway Partners

THURSDAY, MARCH 26

10 A.M.

150713/24 Szalkiewicz v. Liu

FRIDAY, MARCH 27

12 P.M.

30534/19 Wagner v. Robinson

New York County

SUPREME COURT

Ex-Parte Motion Part And Special Term Part

Ex-Parte Motions
Room 315, 9:30 A.M.

Special Term Proceedings
Unsafe Buildings
Bellevue Psychiatric Center
Kirby Psychiatric Center
Metropolitan Hospital
Manhattan Psychiatric Center
Bellevue Hospital

The following matters were assigned to the Justices named below. These actions were assigned as a result of initial notices of motion or notices of petition returnable in the court on the date indicated and the Request for Judicial Intervention forms that have been filed in the court with such initial activity in the case. All Justices, assigned parts and courtrooms are listed herein prior to the assignments of Justices for the specified actions. In addition, listed below is information on Judicial Hearing Officers, Mediation, and Special Referees.

IAS PARTS

1 Silvera: 300 (60 Centre)
2 Sattler: 212 (60 Centre)
3 Cohen, J.: 208 (60 Centre)
4 Kim: 308 (80 Centre)
5 Kingo: 320 (80 Centre)
6 King: 351 (60 Centre)
7 Lebovits: 345 (60 Centre)
8 Kotler: 278 (80 Centre)
9 Capitti: 355 (60 Centre)
11 Frank: 412 (60 Centre)
12 Stroth: 328 (80 Centre)
13 Schumacher 304 (71 Thomas)
14 Bluth: 432 (60 Centre)
15 Johnson: 116 (60 Centre)
17 Hagler: 335 (60 Centre)
18 Tisch: 104 (71 Thomas)
19 Sokoloff: 540 (60 Centre)
20 Kaplan: 422 (60Centre)
21 Tsai: 280 (80 Centre)
22 Chin: 136 (80 Centre)
23 Schumacher 304 (71 Thomas)
24 Katz: 325 (60 Centre)
25 Marcus: 1254 (111 Centre)
26 James, T.: 438 (60 Centre)
27 Dominguez: 289 (80 Centre)
28 Tingling: 543 (60 Centre)
29 Ramirez: 311 (71 Thomas)
30 McMahon: Virtual (60 Centre)
32 Kahn: 1127B (111 Centre)
33 Rosado: 442 (60 Centre)
34 Ramseur: 341 (60 Centre)
35 Perry-Bond: 684 (111 Centre)
36 Saunders: 205 (71 Thomas)
37 Engoron: 418 (60 Centre)
38 Crawford: 1166 (111 Centre)
39 Clynes: 232 (60 Centre)
41 Moyne: 327 (80 Centre)
42 Morales-Minera: 574 (111 Centre)
43 Reed: 222 (60 Centre)
44 Pearlman: 321 (60 Centre)
45 Patel: 428 (60 Centre)
46 Latin: 210 (71 Thomas)
47 Goetz: 1021 (111 Centre)
48 Masley: 242 (60 Centre)
49 Chan: 252 (60 Centre)
50 Sweeting: 279 (80 Centre)
51 Headley: 122 (80 Centre)
52 Sharp: 1045 (111 Centre)
53 Borrok: 238 (60 Centre)
54 Schecter: 228 (60 Centre)
55 d'Auguste: 103 (71 Thomas)
56 Kelley: 204 (71 Thomas)
57 Kraus: 218 (60 Centre)
58 Cohen, D.: 305 (71 Thomas)
60 Crane: 248 (60 Centre)
61 Bannon: 232 (60 Centre)
59 James, D.: 331 (60 Centre)
62 Chesler: 1127A (111 Centre)
65 Reo: 307 (80 Centre)
MFPKahn: 1127B (111 Centre)
MMSP-1: 1127B (111 Centre)
IDV Dawson: 1604 (100 Centre)

PART 40TR
JUDICIAL MEDIATION

On Rotating Schedule:

13 Silvera: 300 (60 Centre)
13 Adams 300 (60 Centre)

EARLY SETTLEMENT

ESC 1 Vigilante 106(80 Centre)
ESC 2 Wilkenfeld 106 (80 Centre)

SPECIAL REFEREES
60 Centre Street

73R Santiago: Room 354
75R Burzio: Room 240
80R Edelman: Room 562
82R Wohl: Room 501B
83R Sambuco: Room 528
84R Feinberg: Room 641
88R Lewis-Reisen: Room 324

JHO/SPECIAL REFEREES
80 Centre Street

81R Hewitt: Room 321
87R Burke: Room 238
89R Hoahng: Room 236

SPECIAL REFEREE
71 Thomas Street

Judicial Hearing Officers

Part 91 Hon. C. Ramos
Part 93 Hon. Marin

Supreme Court
Motion Calendars
Room 130, 9:30 A.M.
60 Centre Street

Supreme Court
Motion Dispositions
from Room 130
60 Centre Street

Calendars in the Motion Submission Part (Room 130) show the index number and caption of each and the disposition thereof as marked on the Room 130 calendars. The calendars in use are a Paper Motions Calendar, E-Filed Motions Calendar, and APB (All Papers By)Calendar setting a date for submission of a missing stipulation or motion paper. With respect to motions filed with Request for Judicial Intervention, counsel in e-filed cases will be notified by e-mail through NYSCEF of the Justice to whom the case has been assigned. In paper cases, counsel should sign up for the E-Track service to receive e-mail notification of the assignment and other developments and schedules in their cases. Immediately following is a key that explains the markings used by the Clerk in Room 130.

Motion Calendar Key:

ADJ—Adjourned to date indicated in Submission Courtroom (Room 130).
ARG—Scheduled for argument for date and part indicated.
SUB (PT #)—Motion was submitted to part noted.
WDN—Motion was withdrawn on calendar call.
SUB/DEF—Motion was submitted on default to part indicated.
APB (All Papers By)—This motion is adjourned to Room 119 on date indicated, only for submission of papers.
SUBM 3—Adjourned to date indicated in Submission Court Room (Room 130) for affirmation or so ordered stipulation.
S—Stipulation.
C—Consent.
C MOTION—Adjourned to Commercial Motion Part Calendar.
FINAL—Adjournment date is final

60 CENTRE STREET

Submissions Part

TUESDAY, FEB. 17

Submission

1 101172/25 Daniels v. Con Ed Co. of New York, Inc. Et
2 101172/25 Daniels v. Con Ed Co. of New York, Inc. Et
3 100233/22 De Silva v. NYC Corp. Counsel
4 101291/25 Elmore v. NYCHA
5 100096/26 Guaman Guaman v. N.Y.C. Dept. of Health And Mental Hygiene
6 100050/26 Ma v. NYC Dept. of Health And Mental Hygiene
7 100519/25 Miss Elegant v. Dr. Arthur
8 100051/26 Rasheed v. NYC Office of Labor Relations

WEDNESDAY, FEB. 18

Submission

1 101182/25 Abreu v. Dept. of Health - Vital Statistic in NYC
2 165540/25 Graziano Jr. v. NYC Et Al
3 101440/25 Kovacs v. Phoenix Owners Corp.
4 100830/23 Reid v. 1460 Second Rlty.

THURSDAY, FEB. 19

Submission

1 100056/24 Alford v. Manchanda

Paperless Judge Part

TUESDAY, FEB. 17

659144/24 12 West 17th St. Tenants' Corp. v. Le Conte Sucre Corp. Et Al
166706/25 214 Ditmas LLC v. NYC Et Al
166692/25 259-261 Halsey St LLC v. NYC Et Al
655817/24 400 East 62nd Properties v. Grupo Cinemex
159113/25 501 Fifth Ave. Co. LLC v. Bello
160970/25 545 West Corp. v. Williams
654750/24 722 Metro. LLC v. Gotham NY LLC
158099/25 Aaogny Corp v. Taeil Enterprise Inc Et Al
190128/23 Aiello v. Dco LLC Et Al
152233/24 Alliance Funding Group v. Medrano Aka Justin R Medrano
805363/17 Almonte v. Shaukat Md
160666/25 American Express Nat. Bank v. Pergola Room LLC Et Al
651767/24 American Express Travel Related Services Co., Inc. v. Business Warrior Corp.
162225/23 American Express Travel Related Services Co., Inc. v. Luxury Electronics Inc.
155521/24 American Express Travel Related Services Co., Inc. v. Rc Home Showcase D/b/a Home Showcase, Inc.
850293/25 American General Life Ins. Co. Et Al v. 500-512 Seventh Ave. Ltd. Partnership Et Al
655533/25 Arena Rec Origination Financing Spv v. Mahic
160328/23 Aspen American Ins. Co. Et Al v. Harbor Freight Tools Co.
850145/16 Bank of NY Mellon v. Kaufman
156182/25 Bernabe v. Verizon New York, Inc., F/k/a NY Telephone Co.
654826/22 Best Work Hldgs. (new York) LLC v. Ma
654266/23 Bimini Partners Llp v. Board of Mgrs. of The Morgan Lofts Condominium
151103/23 Bolouvi v. Brown Brothers Harriman & Co. Et Al
156002/24 Brown v. Dezer Properties II LLC Et Al
165749/25 Bsd 18 Withers Corp. v. McEwan
155089/25 Butler v. American Express Co.
151552/26 C. v. NY Presbyterian Hosp.-Columbia Univ. Irving Medical Center
162309/19 Caccamo v. Jacobs Engineering New York, Inc.
650741/25 Cai v. Wing Fung 2019 Inc. Et Al
655051/23 Capeleris v. Hyundai Marine & Fire Ins. Co., Ltd (u.S. Branch) Et Al
659660/25 Cardinal v. Oppenheimer & Co. Inc.
151243/24 Castellano v. Eo 160 Water LLC Et Al
158791/22 Castillo v. NYCTA
153784/21 Cerros v. NYCTA
155812/22 Chaglla Calucho v. 280 W 155th St. Owner
165593/25 Cimini v. Blackstone Group Mgt.
850158/23 Citibank v. Pieper
850445/24 Citimortgage, Inc. v. 243 East 61st St.
850660/23 Citizens Bank Na v. Perkins
450857/25 NYC v. Shama
365421/24 Cohen v. Cohen
159191/24 Cohen v. 458 Grand B'way. Owners Corp.
153982/25 Collar v. Pfizer Inc. Et Al
150949/24 Coronel v. Phoenix Sutton Str, Inc. Et Al
164915/25 Crescenzi v. NY Police Dept. (nypd) Et Al
952143/23 Damark v. Gary
166679/25 Damerau v. Bleich
153313/24 De Morban v. Gvs Properties Iv
155333/23 Declue v. Nucor Const. Corp. Et Al
190001/25 Deljou Khademi v. Almay, Inc. Et Al
151481/22 Deluise v. 333 East 46th St. Apt. Corp. Et Al
160181/24 Dewald v. Smith
100838/25 Dilisio v. State of NY Div. of Housing And Community Renewal
659702/24 Douglas & London v. Verisma Systems Inc.
154599/19 Duran v. Ery Retail Podium LLC
150113/24 Eadicicco v. Citnalta Const. Et Al
654350/25 Esg Kullen v. Kullen King Properties
651601/25 Exxonmobil Oil Corp. v. Ja Dakis Capital LLC
160865/21 Fermin v. Lic Dev. Owner
151598/18 Foiles v. Eastman
654282/25 Fora Financial Asset Securitization 2024 LLC v. Meridian Associates Inc. D/b/a Meridian Associates Inc. / Meridian Flooring Et Al
160625/24 Fox v. NYC
159822/16 Frankel v. Jaime Andrew Schreck
651360/16 Franklin v. Equity Residential
655894/25 Gabriel v. Good Alma Group
161128/20 Gallegos v. 106 West 56th St.
166469/25 Garcia Guerrero v. 1w3 LLC Et Al
164069/25 Girard-Isaac v. NYC Dept. of Education Et Al
157556/24 Godinez v. 321 Theatrical Mgt. Et Al
652845/25 Goldstream Bay Inc. v. Red Bridge LLC Et Al
156843/24 Goodman v. Shvo
158342/20 Gramarossa v. NYS Urban Dev. Corp. Et Al
101013/22 Gu v. Ji
165138/25 Guzman v. Bhaghiana General Const., Inc. Et Al
151942/25 Gyure v. The Friars Nat. Assoc. Inc. Et Al

150475/25 Hanover Ins. Co. Et Al v. Rightway Plumbing And Heating Inc. Et Al
655663/25 Harris v. Brown Harris Stevens Residential Sales
153036/24 Hereford Ins. Co. v. Burgess
156694/20 Hernandez v. Havemeyer Owner LLC
152118/20 Hicks v. Sl Green Rlty. Corp.
650324/26 High Rise Fire Protection Corp. Et Al v. Aiello
151960/24 Hoefling v. Long Island RR.
156743/25 Hsi v. Brauer
150727/26 Igman Ventures LLC v. Andamio Scaffolding LLC
650685/23 Innovative Securities Ltd v. Obex Securities LLC Et Al
652540/25 Integon Nat. Ins. Co. v. Zheng
654665/25 Jacobowitz v. Heimish Cuisine LLC Et Al
805305/18 Jamie Allon As Executor of v. Smith
655265/25 Jlj Capital LLC v. Churchill Real Estate Hldgs. LLC
159187/25 Kamboj v. NY Univ. Et Al
164554/25 Kennedy v. Board of Education of The City School Dist. of NYC Et Al
659182/25 Kent Security of New York, Inc. v. Jumeaux Mgt. LLC
157612/25 Kim v. 16 Park Ave. Owners Corp.
152115/23 Kleinberg v. Ria R Squared, Inc.
163217/25 Koo v. Marin
850124/22 L&L Caital Partners LLC v. 194 Orchard Group
950474/20 L. v. Archdiocese of NY
656362/25 Lave. Dermatology & Aesthetic Surgery v. Upstrate Inc Et Al
655851/24 Leon v. Cheung
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159269/25 Liu v. The Augustine Fellowship Slaa Fellowship-Wide Services Inc Et Al
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653718/25 Nicole Rose Jewelry LLC v. 2 West 46 Borrower
156949/22 Niera Tomala v. Hibernia Const. Corp Et Al
161105/22 Ortega v. Martinez
164511/25 Pace v. Youner
157406/25 Pachman v. Board of Mgrs. of 866 Third Ave. Condominium Et Al
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159015/24 Palmese v. NYC Dept. of Education Et Al
153838/20 Patino v. 51 West 81st St. Corp.
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850387/23 Piermont Bank v. 24th St. Mmp Garage LLC Et Al
156048/25 Pittman v. Pandora Media
656202/25 Prime Food Sales, Inc. v. Dimaria
159129/25 Profile Enterprises 2 LLC v. Kisielewska
650344/26 Quinn v. Orsid Rlty. Corp. Et Al
654398/25 Reem Bridals LLC v. 500-512 Seventh Ave. Ltd. Partnership
653240/25 Residential Board of Mgrs. of The 180 East 88th St. Condominium v. 180 East 88th St. Rlty. LLC Et Al
161135/21 Rivera v. Cavan Builders Corp. Et Al
151770/25 Ryan v. E. Mishan & Sons, Inc. Et Al
652571/23 Sabby Volatility Warrant Master Fund v. Mmex Resources Corp.
157124/17 Sacks v. NYC
154316/18 Santana v. Skanska USA
654231/24 Schusterman v. Sutton House, Inc.
155701/22 Schwab v. 170 West End Ave. Condominium
154906/23 Shteiman v. Dunkin' Brands, Inc. Et Al
160089/24 Silva-Gomez v. Madison Square Garden Entertainment Corp. Et Al
650344/19 Simpex Pharmachem Inc. v. Pharbest Pharmaceuticals Inc.
164908/25 Skyline Steel Worx, Inc. v. Ym4 LLC Et Al
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450371/25 State of NY v. Hamilton
150618/20 Suarez v. Jakubowicz
159758/23 Sulkja v. Midtown West B LLC Et Al
452318/25 Tax Aguilar v. NYC Et Al
162253/24 Tbf Financial v. Heinze
452463/25 NYC Et Al v. 161-163 Rockaway Ave LLC
164704/25 The Plumbing Foundation NYC, Inc. on Behalf of Its Members v. Dept. of Bldgs. of NYC Et Al
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155823/25 Vivians v. Qp Hosp LLC Et Al
652879/25 Voya Investment Trust Co. - Voya Senior Loan Trust Fund Et Al v. Chirico Jr
659041/24 Wesco Ins. Co. v. The Apostolic Church of New York, Inc. Et Al
659192/25 West Eden LLC v. Lesmes
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653662/25 Whitecap Search Hldgs. LLC v. 14 St. Medical
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651266/15 398 Ph LLC v. Ross
152027/25 64 Univ. Pl. LLC Et Al v. Ancora Engineering Pllc
159463/21 Abad v. Tishman Const. Corp. Et Al
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654996/25 Akf Inc. v. NY Helicopters Tours L.L.C. Et Al
159519/24 Al Madhloom v. World Import of Livingston Ave LLC Et Al
157416/23 Amaya Romero v. Urban Atelier Group
155266/25 An Individual Identified Herein By Pseudonym v. Hotel Pennsylvania Et Al
653457/25 Anjost Corp. Et Al v. H&R Block, Inc. Et Al
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152204/22 Deleon v. Cao
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654014/24 Ellis Storage LLC v. Crum & Forster Specialty Ins. Co. Et Al
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153515/25 Farkhad v. French 37 LLC Et Al
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653830/24 Ludwig Plus v. Biz2credit, Inc.
165983/25 Marks v. Sullivan & Brill
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652560/25 McGlynn Hays & Co. Inc. v. Falcon Properties Inc. Et Al
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805141/18 Milenkovic v. Silver
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158529/23 Vivas v. Metro. NYCTA Et Al
155597/22 Wallace v. NYC Et Al
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151743/137-11 East 13th St. v. New School
158149/25 Adams v. Amc Entertainment Hldgs. Inc Et Al
151628/15 Alshyef v. Muramatsu
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155739/24 American Express Travel Related Services Co., Inc. v. Gamma Hldgs.
656229/25 Austin Pearce Ventures v. White
650301/26 Backoffice.Co v. Jazz Heating And Air Conditioning Inc.
156323/21 Berardi v. 900 Third Ave.
157392/25 Berberoglu v. NY Film Academy Ltd. Et Al
152681/19 Bilyeu v. Bmw of North America LLC
655119/23 Board of Mgrs. of Eleven East Sixty-Eighth St. Condominium v. 11 East 68th St. LLC Et Al
651790/23 Board of Mgrs. of The Harrison Condominium v. Harrison Retail Associates LLC Et Al

COURT NOTES

NEW YORK STATE COURT OF APPEALS

January 2026 Appeals

The Clerk's Office announces that briefing schedules have been issued for the following appeals during January 2026.

Docket information, briefing schedules, filings and oral argument dates are or will be available through the Court's Public Access and Search System (CourtPASS).

Nonparties seeking to appear as amicus curiae should refer to Court of Appeals Rule of Practice 500.23.

Civil Appeals by Leave Grant of the Court of Appeals and Departments of the Appellate Division:

APL-2026-00001: Patel v. Maybank (2025 NY Slip Op 05194); Employment Relationships—Whether Claim for Unpaid Severance Pay under Labor Law §§ 193 and 198 is barred by Labor Law §198-c because plaintiff is an executive

APL-2025-00225: Zain v. Isaacson (242 AD3d 438); Physicians and Surgeons—Malpractice—Immunity Under the Emergency or Disaster Treatment Protection Act—Coverage for Podiatrists

Criminal Appeals by Leave Grant of Judges of the Court of Appeals and Justices of the Departments of the Appellate Division:

APL-2025-00206: People v. Jefferson (Earl) (229 AD3d 723); Crimes—Vacatur of Judgment of Conviction—Whether Undisclosed Recorded Statement Constituted Brady Material or Newly Discovered Evidence

APL-2025-00221: People v. Vassell Ray (236 AD3d 933); Crimes—Appeal—Effective Assistance of Appellate Counsel— Access to Trial Exhibits

APL-2025-00207: People v. Williams (Jamarly) (241 AD3d 1106); Crimes—Identification of Defendant—Suppression of Eyewitness Identification—Ineffective Assistance of Appellate Counsel

Civil Appeals Taken as of Right:

APL-2025-00172: Poltorak v. Clarke (2025 NY Slip Op 04496); Habeas Corpus—CPLR 7003(c)—Constitutionality of Forfeiture—Judicial Compensation Clause—Separation of Powers

APL-2025-00171; People by James v. Trump (2025 NY Slip Op 04756); Attorney General—Powers—Executive Law § 63(12) — Constitutionality of Executive Law § 63(12)

NEW YORK COUNTY

Supreme Court - Civil Term

Judicial Assignments and Reassignments

As of December 31, 2025, five long-serving Justices of the Supreme Court, Civil Branch, New York County, Honorable Arthur F. Engoron, Honorable Debra A. James, Honorable Richard G. Latin, Honorable W. Franc Perry III and Honorable Mary V. Rosado have retired from the bench. In addition, Justice Denise M. Dominquez and Justice Denis Reo have moved to other Courts. We would like to thank all our Justices for their wonderful service to our court.

Assignments and Reassignments:

Hon. **Dana M. Catanzaro** has joined the Court and is assigned to General IAS Part 37. Justice Catanzaro's courtroom and chambers will be located at 111 Centre Street, Courtroom 1127A and Chambers Room 541. The Part phone number is 646-386-3222. The Chambers phone number is 646-386-3181.

Hon. **Matthew V. Grieco** has joined the Court and is assigned to General IAS Part 30. Justice Grieco's courtroom and chambers will be located at 111 Centre Street, Courtroom 623 and Chambers Room 466. The Part phone number is 646-386-3275. The Chambers phone number is 646-252-5086.

Hon. **Brendan T. Lantry** has joined the Court and is assigned to General IAS Part 46. Justice Lantry will assume Hon. **Richard G. Latin**'s inventory. Justice Lantry's courtroom and chambers will be located at 71 Thomas Street, Room 103. The Part phone number is 646-386-3279. The Chambers phone number is 646-386-4945.

Hon. **Anna R. Lewis** has joined the Court and is assigned to the Mental Hygiene Part. Justice Lewis will assume Hon. **W. Franc Perry III'**s inventory. Justice Lewis' chambers will be located at 60 Centre Street, Room 561. The phone number for Chambers is 646-386-3944.

Hon. **Kim M. Parker** has joined the Court and is assigned to Guardianship Part 25. Justice Parker will assume Hon. **Ilana Marcus**' inventory. Justice Parker's courtroom and chambers will be located at 111 Centre Street, Courtroom 1254 and Chambers Room 448. The Part phone number is 646-386-5675. The Chambers phone number is 646-582-5089.

Hon. **John Zhuo Wang** has joined the Court and is assigned to the Midtown Community Justice Center and Special Proceeding Part. Justice Wang's courtroom and chambers will be located at 314 West 54th Street, 5th Floor. The Part phone number is 646-582-5004. The Chambers phone number is 646-264-1371.

Hon. **Yael Wilkofsky** has joined the Court and is assigned to Matrimonial Part 51. Justice Wilkofsky will assume part of Hon. **Lisa A. Headley**'s inventory. Justice Wilkofsky's courtroom and chambers will be located at 80 Centre Street, Room 289. The Part phone number is 646-386-3846. The Chambers phone number is 646-582-5077.

Hon. **Jeffrey S. Zellan** has joined the Court and is assigned to Matrimonial Part 49. Justice Zellan will assume part of Hon. **Lisa A. Headley**'s inventory. Justice Zellan's courtroom and chambers will be located at 80 Centre Street, Room 307. The Part phone number is 646-252-5140. The Chambers phone number is 646-252-5073.

Hon. **James G. Clynes** remains assigned to General IAS Part 39. Justice Clynes' courtroom and chambers will be located at 60 Centre Street, Courtroom 331 and Chambers Room 652. The Part phone number is 646-386-3619. The Chambers phone number is 646-386-5383.

Hon. **James d'Auguste** is now assigned to Commercial Division Part 55. Justice d'Auguste's courtroom and chambers will now be located at 71 Thomas Street, Room 210. The Part phone number, 646-386-3289, and the Chambers phone number, 646-386-5698, remain unchanged.

Hon. **Lisa A. Headley** is now assigned to General IAS Part 17. Justice Headley's courtroom and chambers will remain located at 80 Centre Street, Room 122. The Part phone number is 646-252-5141. The Chambers phone number, 646-386-3150, remains unchanged.

Hon. **Judy H. Kim** remains assigned to General IAS Part 4. Justice Kim's courtroom and chambers will be located at 60 Centre Street, Courtroom 418 and Chambers Room 665. The Part phone number, 646-386-3580, and the Chambers phone number, 646-386-5577, remain unchanged.

Hon. **Hasa A. Kingo** is now assigned to General IAS Part 65. Justice Kingo will assume Hon. **Denis Reo**'s inventory. Justice Kingo's courtroom and chambers will remain located at 80 Centre Street and have moved to Room 308. The Part phone number is 646-386-3887. The Chambers phone number, 646-386-4740, remains unchanged.

Hon. **Ilana Marcus** is now assigned to City and Transit IAS Part 5. Justice Marcus will assume Hon. **Hasa A. Kingo**'s inventory. Justice Marcus' courtroom and chambers will be located at 80 Centre Street, Room 320. The Part phone number is 646-386-3374. The Chambers phone number, 646-386-4969, remains unchanged.

Hon. **Anar Rathod Patel** remains assigned to Commercial Division Part 45. Justice Patel's courtroom and chambers will remain located at 60 Centre Street, Courtroom 428, and Chambers has moved to Room 512. The Part phone number, 646-386-3632, and the Chambers phone number, 646-386-3234, remain unchanged.

Hon. **Leslie A. Stroth** remains assigned to General IAS Part 12. Justice Stroth's courtroom and chambers will be located at 60 Centre Street, Courtroom 442 and Chambers Room 659. The Part phone number, 646-386-3273, and the Chambers phone number, 646-386-5622, remain unchanged.

Hon. **Kathleen Waterman-Marshall** remains assigned to General IAS Part 31. Justice Waterman-Marshall's courtroom and chambers will be located at 60 Centre Street, Courtroom 335 and Chambers Room 660. The Part phone number, 646-386-4296, and the Chambers phone number, 646-386-4289, remain unchanged.

Counsel are advised to sign up for the court system's E-Track service. E-Track allows counsel to list with the service some or all the firm's cases pending in the Supreme Court, Civil Branch, New York County, and other counties as well. E-Track provides notification by e-mail of all appearances and adjournments in covered cases that are recorded in the court's electronic case history program, as well as other developments, such as the reassignment of cases and the issuance of decisions and long-form orders. E-Track can also provide appearance reminders should counsel wish to avail themselves of that capability.

To sign up for E-Track, counsel should go to the following address: http://iapps.courts.state.ny.us/webcivil/etrackLogin

NEW YORK STATE COURT OF APPEALS

Court To Hear Arguments in the Bronx in March

The Court will be hearing argument away from Court of Appeals Hall in Albany for its upcoming March 2026 Session.

On March 10, 11 and 12, the Court will hear argument at the Bronx Hall of Justice, 265 East 161 Street, Bronx, New York. Arguments will commence at 9:30AM. A live webcast of the argument may be accessed through the Court of Appeals website.

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Deadline for Amicus Curiae Motions: February 2026 and March 2026 Sessions

The Court has calendared the appeals in *People v. Gaffney* (Luke J.) (APL 2025-00077), *People v. Curry* (Eugene) (APL 2025-00076), and *People v. Billups* (Ricky) (APL 2025-00108) for argument during its February 2026 Session. The Court has set a special deadline for motions seeking to participate as amicus curiae in these appeals. Motions for permission to file a brief amicus curiae in these appeals must be served no later than December 22, 2025 and noticed for a return date no later than January 5, 2026.

The Court has calendared the appeal in *Matter of Bi-Coastal Properties v. Soliman* (APL 2025-00136) for argument during its March 2026 Session. The Court has set a special deadline for motions seeking to participate as amicus curiae in this appeal. Motions for permission to file a brief amicus curiae in the Matter of Bi-Coastal Properties appeal must be served no later than January 27, 2026 and noticed for a return date no later than February 9, 2026.

Questions may be directed to the Clerk's Office at (518) 455-7705.

UNIFIED COURT SYSTEM

Advisory Committee on AI and the Courts Issues Inaugural Annual Report

An advisory group appointed by Chief Administrative Judge Joseph A. Zayas to study the intricate issues surrounding the use of artificial intelligence in the courts has released its inaugural annual report, a landmark document outlining policies, recommendations, and ethical frameworks for the responsible use of AI in the state's court system.

Drawing on the diverse expertise of its 40-plus members, the Advisory Committee on Artificial Intelligence and the Courts thoroughly explored the opportunities AI presents to improve efficiency, enhance legal services, and expand access to the courts, while also confronting the serious risks it poses, such as bias, misinformation, and threats to confidentiality and due process.

Based on extensive research, stakeholder engagement, and collaborative deliberation, the 154- page report includes findings, recommendations, and policy proposals from each of the Advisory Committee's six specialized subcommittees: Access to the Courts; Bias and Equity; Court Administration and Management; Evidence, Authenticity, and Reliability; Generative AI in Lawyering and Dispute Resolution; and Knowledge, Proficiency, and Professional Responsibility.

Among the highlights contained in the report are:

• An interim policy on AI use, adopted by the court system in October 2025, that establishes guardrails for judges and court staff, requiring AI training and restricting AI use to approved platforms such as Microsoft Copilot Chat, with the Advisory Committee now monitoring feedback from the 200-plus judges and non-judicial employees who recently completed the court system's Microsoft Copilot Chat pilot program.

• A document produced in connection with the AI use policy that sets forth ethical considerations for

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164501/25 Crespo v. NYC Et Al
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162376/23 De Leon Pascual v. B'way. Const. Group LLC Et Al
152270/22 Dilipchand v. Tmg Const. Corp. Et Al
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151362/23 Wesco Ins. Co. v. Sean Coakley Plumbing & Heating Inc.
164555/25 Xin Tai Delaware 888 LLC v. Comm'r. of NYC Dept. of Finance Et Al

E-Filing Submission Part

Adjourned for Working Copies Part

Part 1

Justice Adam Silvera
60 Centre Street
Phone 646-386-3722
Room 300

TUESDAY, FEB. 17

153193/18 Zhang v. Triboro Bridge And Tunnel

WEDNESDAY, FEB. 18

160147/22 Capasso v. Makhyu
154532/22 Cedeno v. Herrera
152561/21 Gonzalez v. Modgill
153822/21 Kolenovic v. Cheema
158155/19 Said v. Tocaciu
155560/22 Sandoval Moreno v. Ahmed
155083/20 Sena v. Rim
152197/21 Shteyman v. Rodriguez
152148/23 Vuljaj v. McNeil

THURSDAY, FEB. 19

160557/16 Aull v. NYCTA
156839/19 Bindler v. Center At Lenox
150593/19 Burks v. Hrces D/b/a C & R
161245/23 Deutsch v. Mitchell Nguyen McCormack A/k/a Quang T. Nguyen
156100/22 Jose Macancela And Karolina Atamirano v. The First Presbyterian Church of Jamaica Et Al
160470/21 O'Connor v. Fourth Wall Restaurants

Part 2

Justice Lori S. Sattler
60 Centre Street
Phone 646-386-3852
Room 212

TUESDAY, FEB. 17

655056/23 210 Prinkipas LLC Et Al v. Levy
654750/24 722 Metro. LLC v. Gotham NY LLC
656384/21 Ashenberg Law Group v. Mei He
650434/21 Broad St. Suites LLC v. Suri Law Immigration
651692/23 Crestwood Services LLC v. Soleil Chartered Bank Et Al
160709/22 Eg Munoz Const. LLC v. Plaza Const. LLC Et Al
655722/20 Eskandari Stone NY Inc. v. Tuscany Marble And Granite
259920/20 Flagship 660 Owner LLC v. The Tax Comm. of NYC
152338/22 Gallagher v. Mayflower 221 LLC Et Al
656523/22 Gordon v. Triumph Const. Corp. Et Al
650106/21 Houston Casualty Co. v. Travelers Prop.
651484/21 Incygys Global Consulting v. Ariston Tek, Inc.
159084/22 Inm Zv v. Schwartz
653599/20 Lotus Residences LLC. Et Al v. Northfield Ins. Co. Et Al
451968/24 Motor Vehicle Accident Indemnification Corp. v. Gori
153400/20 O'Hara v. Board of Directors of
159832/23 Rational Surgical Solutions v. Hishmeh
652571/23 Sabby Volatility Warrant Master Fund v. Mmex Resources Corp.
650902/23 Tahor 26 Owner LLC Et Al v. Intrinsic Office Solutions
153935/24 Tribeca Hummus Inc. D/b/a Nish Nush v. Nj Funding, Inc.
655131/21 Varyence v. Rational Surgical Solutions
653226/21 Yang v. An Ju Home Inc Et Al
653227/21 Zhang v. An Ju Home Inc Et Al

Motion

650434/21 Broad St. Suites LLC v. Suri Law Immigration
651692/23 Crestwood Services LLC v. Soleil Chartered Bank Et Al
153400/20 O'Hara v. Board of Directors of
159832/23 Rational Surgical Solutions v. Hishmeh
153935/24 Tribeca Hummus Inc. D/b/a Nish Nush v. Nj Funding, Inc.

WEDNESDAY, FEB. 18

254854/22 697 Fifth/2 E 55th St Tic A Titleholder LLC & 697 Fifth/2 E 55th St Tic B Mortgage Borrower LLC v. The Tax Commission of The City of New York
256917/21 731 Retail One LLC v. The Tax Comm. of NYC
656440/17 Bp 599 Lexington Ave. LLC v. Europa of 53rd St. Inc.
651624/20 Conzentino v. Reda
659056/24 Cottages Inv LLC Et Al v. Dancykier
153552/24 Infinity Auto Ins. Co. v. German
655579/24 North Mill Credit Trust v. Nats Mountain House LLC Et Al
155195/17 Quinn v. Parkoff Operating Corp.
652061/24 Rosmil Tile & Painting Corp. Dba Videral Interior v. The Moinian Group A/k/a Columbus Mgt. Et Al
153261/24 Stillwater Prop. & Casualty Ins. Co. v. Deen
654277/24 Surfside Solutions Inc. v. Green Bee Meds LLC Et Al
651315/22 The Browning School v. Wolff
651333/24 Urban Holiday LLC v. Stawski Partners Corp.

Motion

651624/20 Conzentino v. Reda
651315/22 The Browning School v. Wolff

THURSDAY, FEB. 19

254658/21 122 Norfolk Street v. The Tax Commission of The City of New York
255920/21 125 E. 31 St. Rlty. Co. LLC v. The Tax Comm. of NYC
259375/14 13-19 Cumming St. v. Tax Comm. of The
259716/18 1395 Rlty. Group LLC v. The Tax Comm. of NYC
250383/19 14 East 58th LLC v. Tax Comm. of The
256220/17 164 Waverly Pl. v. Tax Comm. of The
254489/12 165 Waverly Pl. v. The Tax Comm. of NYC
259810/18 207 Madison Owners LLC v. The Tax Comm. of NYC
253651/16 255 W. 108th St. Corp. v. The Tax Comm.
256351/17 298 Fifth Ave. Corp. v. The Tax Comm. of NYC
256957/17 304 West 49th Garage LLC v. Tax Comm. of The
250733/17 323 West 34th St. LLC v. Tax Comm. of The
259141/15 37 West 72nd St., Inc. v. The Tax Comm. of NYC
251617/18 4 Park Ave. Associates v. The Tax Comm. of NYC
265975/23 510 Fifth Propco LLC v. The Tax Comm. of NYC
261169/21 52 West 55th St. LLC v. The Tax Comm. of NYC
264529/17 520 West 27th St. Condominium v. The Tax Comm. of NYC
262108/18 56th St. Commons LLC v. The Tax Comm. of NYC
250580/24 5th Midtown LLC v. The Tax Comm. of NYC
250008/13 62nd St. East, Inc. v. The Tax Comm.
252558/24 720 Fifth USA v. The Tax Comm. of NYC
250736/17 9 West 35th St. LLC v. The Tax Comm. of NYC
257574/12 A. Trenkmann Estate, Inc. v. The Tax Comm.
155389/22 Asal Hldg. Co. v. Servpro Restoration of Upper Westside
263907/20 Best Work Hldgs. (new York) LLC v. The Tax Comm. of NYC
251718/23 Bldg 900 First LLC v. The Tax Comm. of NYC
260651/18 Bldg. 424 Olive LLC v. The Tax Comm. of NYC
256998/22 Blue Millennium Rlty. LLC v. The Tax Comm. of NYC
257952/19 Bond St. Levy v. The Tax Comm. of NYC
259877/18 Broome-Thompson v. The Tax Comm.
264922/21 Columbus Ave. Hldg. Corp. v. The Tax Comm. of NYC
251193/21 David Ellis Real Estate v. The Tax Comm. of NYC

Court Calendars Continued On Page 19

CLASSIFIED ADVERTISING

CITATIONS NY

File No. 2024-880 — CITATION — The People of the State of New York by the Grace of God Free and Independent — TO: the unknown heirs at law, and next of kin of DORIS BENDHEIM a/k/a DORIS LOEB BENDHEIM, deceased, if they be living, and if they be dead, to their Executors, Administrators, Creditors and Lienors, their husband or wives or successors in interest. - A petition having been filed by Barry J. Albano who is domiciled at 330 East 38th Street, Apt, 44E, New York, New York 10016 YOU ARE HEREBY CITED TO SHOW CAUSE by making a virtual or in-person appearance before the Surrogate's Court, Bronx County, New York, located at 851 Grand Concourse, Courtroom 406, Bronx, New York, 10451, on March 31, 2026, at 9:30 (a.m.) why the Court should not grant the following relief: CONTACT THE COURT AT (718) 618-2373 OR VIRTUALBRONX-SURROGATESCOURT@NYCOURTS.GOV FOR INFORMATION ON HOW TO APPEAR ON THE COURT'S VIRTUAL PLATFORM Dated, Attested and Sealed, January 29, 2026 Hon. Nelida Malave-Gonzalez SURROGATE Johanna K. O'Brien, Acting Chief Clerk ATTORNEY Petitioner's Attorney: Carole M. Bass Address: 1251 Avenue of the Americas, 19th Floor New York, NY 10020 Telephone Number: (212) 660-3047 E-Mail: cbass@sullivanlaw.com [NOTE: This citation is served upon you as required by law. You are not required to appear. If you fail to appear it will be assumed you do not object to the relief requested. You have a right to have an attorney appear for you.]
20719 f10-Tu m3

FOUNDATIONS

THE ANNUAL RETURN OF The Matovu Foundation for the Fiscal year ended June 30, 2025 is available at its principal office located at 188 Willow Tree Road, Wesley Hills, NY 10952 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Michael Goldberg.
21092 f17

THE ANNUAL RETURN OF The Price Foundation. For the year ended 10/31/25 is available at its principal office located at 537 Perugia Way, Los Angeles, CA 90077 for the inspection during regular business hours by any citizen who requests it within 180 days hereof. Principal Manager of the Foundation is Michael Price.
21066 f17

LIQUOR LICENSES

NOTICE IS HEREBY given that an On-Premise Restaurant Full Liquor License, NYS Application ID: NA-0340-25-139145 has been applied for by Lotus Collective LLC serving beer, wine, cider, mead and liquor to be sold at retail for on premises consumption in a restaurant, for the premises located at 162 Orchard St New York NY 10002.
20896 f10-Tu f17

NOTICE IS HEREBY given that an On-Premise Restaurant Wine License, NYS Application ID: NA-0240-25-138694 has been applied for by Shtick New York LLC serving beer, wine, cider and mead to be sold at retail for on premises consumption in a restaurant, for the premises located at 36 Orchard St New York NY 10002.
20898 f10-Tu f17

NOTICE IS HEREBY given that an On-Premises Food & Beverage-Business Liquor License, NYS Application ID NA-0370-25-138374 has been applied for by Tinto LLC serving beer, wine, cider, mead and liquor to be sold at retail for on-premises consumption in a Food & Beverage Business-Liquor establishment located at 41 Monroe St New York NY 10002.
20900 f10-Tu f17

NOTICE IS HEREBY given that an On-Premises Food & Beverage-Business Liquor License, NYS Application ID NA-0370-25-138237 has been applied for by Room Service Gansevoort Street LLC serving beer, wine, cider, mead and liquor to be sold at retail for on-premises consumption in a Food & Beverage Business-Liquor establishment located at 63 Gansevoort St New York NY 10014.
20903 f10-Tu f17

NOTICE IS HEREBY given that a Tavern Wine License, NYS Application ID NA-0267-25-123934 has been applied for by Studio6 Collective LLC d/b/a Studio 6 to sell beer, wine, mead and cider at retail in a Tavern. For on premises consumption under the ABC law located at 106 Rivington Street New York NY 10002.
20901 f10-Tu f17

LIQUOR LICENSES

NOTICE IS HEREBY given that a license, Application ID NA-0240-26-102430, has been applied for by the undersigned to sell Beer, Wine and Cider at retail in a Restaurant under the Alcoholic Beverage Control Law at 44 Greenwich Ave, New York, NY 10011, New York County, for on premises consumptio
21097 f17-Tu f24

LIMITED LIABILITY ENTITIES

RANDOLPH AND ASSOCIATES, PLLC, Art. of Org. filed with SSNY 1-29-26, duration Perpetual. Office Location: New York County. SSNY designated as agent of the PLLC for service of process. SSNY shall mail a copy of any process to c/o William Randolph, 619 Third Ave., #12H, NY, NY 10128, Purpose: Practice the Profession(s) of Law.
21064 f17-Tu m24

MSC NP in Acute Care PLLC filed w/ SSNY 1/12/26. Off. in Nassau Co. Process served to SSNY - desig. as agt. of PLLC & mailed to the PLLC, 1245 Tulip Ln, Wantagh, NY 11793. The reg. agt. is Margarite Soh-Choe at same address. Any lawful purpose.
20411 Feb3 tu Mar10

ERIC DAVIS DDS PLLC. Arts. of Org. filed with the SSNY on 09/09/25. Office: Nassau County. SSNY designated as agent of the PLLC upon whom process against it may be served. SSNY shall mail copy of process to the PLLC, 2001 Marcus Avenue, Suite E244, Lake Success, NY 11042. Purpose: For the practice of the profession of Dentistry.
19958 j20-Tu f24

Tarika Nagi Medical PLLC filed w/ SSNY 1/12/26. Off. in Nassau Co. Process served to SSNY - desig. as agt. of PLLC & mailed to the PLLC, 64 N. Dr, New Hyde Park, NY 11040. Any lawful purpose.
20061 Jan27 tu Mar3

NOTICE OF FORMATION of ROBERT ROHAN CPA, PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 12/22/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 50 West 72nd Street, Apt 302, New York, NY 10023. Purpose: any lawful act.
20884 F10 T M17

NOTICE OF FORMATION of Wright Wellness NP in Family Health PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 9/24/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 5680 Broadway #1098, Bronx, NY 10463 /Latoya Wright. Purpose: any lawful act.
18559 F10 T M17

NOTICE OF FORMATION of Mayrsohn Medical, PLLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/16/2026. Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 146A Manetto Hill Rd., Ste. 100, Plainview, NY 11803. Purpose: to practice the profession of medicine.
20565 f3-Tu m10

NOTICE OF FORMATION of COLUMBO LAW GROUP, PLLC. Arts. Of Org. filed with SSNY on 10/21/2025. Office location: Nassau SSNY desg. as agent of PLLC upon whom process against it may be served. SSNY mail process to 10 HONEY DRIVE, SYOSSET, NY 11791. Any lawful purpose.
20854 Feb10 tu Mar17

NOTICE OF FORMATION of BRUENING LAW PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/30/2025. Office Location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to P/B/A: 224 W 35th St, Ste 500 #667, New York, NY 10001. Purpose: any lawful act.
19634 J13 T F17

NOTICE OF FORMATION of Upper East Side Dermatology, PLLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/30/2026. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: Delaney Corporate Services, Ltd., 99 Washington Ave., Ste. 805A, Albany, NY 12210. Purpose: to practice the profession of medicine.
21169 f17-Tu m24

NOTICE OF FORMATION of Joseph A. Bondy, PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/20/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 43 West 43rd Street, Suite 379, New York, NY 10036. Purpose: any lawful act.
19633 J13 T F17

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of Devora Finkel Law PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/31/2025. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 262 Mulberry Lane, West Hempstead, NY 11552. Purpose: any lawful act.
19647 J13 T F17

NOTICE OF FORMATION of MEEKA J. BONDY, PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 11/13/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 43 West 43rd Street, Suite 419, New York, NY 10036. Purpose: to practice the profession of law.
19635 J13 T F17

NOTICE OF FORMATION of REDBIRD ARCHITECTURE DESIGN, LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 01/02/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to P/B/A: 295 W 150th Street, Unit 34, New York, NY 10039. Purpose: any lawful act.
19651 J13 T F17

NOTICE OF FORMATION of Atelier Avenir Architecture PLLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/12/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 418 Broadway, STE R, Albany, NY 12207. Purpose: to practice the profession of architecture.
19603 j13-Tu f17

NOTICE OF FORMATION of JEFFREY L SEAL MD, PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/2/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 28 Liberty St, New York, NY 10005. P/B/A: 447 Broadway, 2nd Fl #868, New York, NY 10013. Purpose: any lawful act.
19983 J20 T F24

NOTICE OF FORMATION of Lineage Law & Strategies, PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 12/29/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 2190 Madison Avenue, Apt 8G, New York, NY 10037. Purpose: any lawful act.
19947 J20 T F24

NOTICE OF FORMATION of MODUS MEDICINE, PLLC. Arts. of Org. filed with SSNY on 01/21/2026. Office location: New York SSNY desg. as agent of PLLC upon whom process against it may be served. SSNY mail process to 433 E. 56TH STREET, APT. 10AB, NEW YORK, NY 10022. Any lawful purpose.
20839 Feb10 tu Mar17

ERIN ANDERSON RN, PLLC. Filed with SSNY on 10/28/2025. Office location: New York County. SSNY designated as agent for process and shall mail to: 242 W 14TH ST., APT. 4, NEW YORK, NY 10011. Purpose: Registered Professional Nursing
20545 f3-Tu m10

LIMITED LIABILITY ENTITIES

Notice of Qualification of Design Workshop New York, PLLC. App. for auth. filed with Secy. of State of NY (SSNY) on 12/16/2025. Office location: NY County. PLLC formed in CO on 7/3/2025. SSNY designated as agent of PLLC upon whom process against it may be served. SSNY shall mail process to 801 Second Ave, Fl 15, New York, NY 10017. CO address of PLLC: 22860 Two Rivers Rd, Ste 102, Basalt, CO 81621. Arts of Org. filed with the Secy. of State of CO, 1700 Broadway, Ste 550, Denver CO 80290. Purpose: any lawful activity.
19658 J13 T F17

LIMITED LIABILITY ENTITIES

NOTICE OF QUALIFICATION of RCCP NY HOTEL OPERATOR, LLC Appl. for Auth. filed with Secy. of State of NY (SSNY) on 01/16/26. Office location: NY County. LLC formed in Delaware (DE) on 01/13/26. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to Corporation Service Co., 80 State St., Albany, NY 12207-2543. DE addr. of LLC: 251 Little Falls Dr., Wilmington, DE 19808. Cert. of Form. filed with DE Secy. of State, Div. of Corps., John G. Townsend Bldg., 401 Federal St., Ste. 4, Dover, DE 19901. Purpose: Any lawful activity.
20296 Jan27 tu Mar3

LIMITED LIABILITY ENTITIES

CASSANDRA A LEONE MENTAL HEALTH COUNSELOR PLLC, a Prof. LLC. Arts. of Org. filed with the SSNY on 02/10/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against it may be served. SSNY shall mail process to: The PLLC, 2001 Grove Street, Wantagh, NY 11793. Purpose: To Practice The Profession Of Mental Health Counselor.
21211 f17-Tu m24

ROCCO A. MASTRONARDI, PE, PLLC, a Prof. LLC. Arts. of Org. filed with the SSNY on 02/10/2026. Office loc: Westchester County. SSNY has been designated as agent upon whom process against it may be served. SSNY shall mail process to: The PLLC, 68 Emerson Ave, Croton On Hudson, NY 10520. Purpose: To Practice The Profession Of Professional Engineering.
21217 f17-Tu m24

NOTICE OF FORMATION of Ashley Aaron Landscape Architecture PLLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/22/2025. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against PLLC to 7 Arbor Lane, Merrick, NY 11566. Purpose: any lawful act.
21173 F17 T M24

LIMITED LIABILITY ENTITIES

NOTICE OF QUALIFICATION of EUSTIS ENGINEERING NORTHEAST, PLLC. App. for auth. filed with Secy. of State of NY (SSNY) on 1/13/2026. Office loc: NY County. PLLC formed in Connecticut (CT) on 10/24/2025. SSNY designated as agent upon whom process against it may be served. SSNY shall mail process to 801 Second Ave, Fl 15, New York, NY 10017. P/B/A: 63 Eastern Blvd, Glastonbury, CT 06033. Cert. of PLLC filed with Secy. of State of CT loc: 165 Capitol Ave, Ste 1000, Hartford, CT 06106. Purpose: any lawful act or activity.
20576 F17 T M24

LIMITED LIABILITY ENTITIES

RIDE MYLE HOLDINGS LLC. Filed with SSNY on 07/22/2025. Office: Nassau County. SSNY designated as agent for process & shall mail to: 225 CROSSWAYS PARK DR, WOODBURY, NY 11797. Purpose: Any Lawful
21179 f17-Tu m24

ARENA STILLWELL I ESR, LLC. Filed with SSNY on 02/03/2026. Office: New York County. SSNY designated as agent for process & shall mail to: 99 WASHINGTON AVE STE 700, ALBANY, NY 12260. Purpose: Any Lawful
20920 f10-Tu m17

ARENA STILLWELL II ESR, LLC. Filed with SSNY on 02/03/2026. Office: New York County. SSNY designated as agent for process & shall mail to: 99 WASHINGTON AVE STE 700, ALBANY, NY 12260. Purpose: Any Lawful
20915 f10-Tu m17

ARENA STILLWELL III ESR, LLC. Filed with SSNY on 02/03/2026. Office: New York County. SSNY designated as agent for process & shall mail to: 99 WASHINGTON AVE, STE 700, ALBANY, NY 12260. Purpose: Any Lawful
20918 f10-Tu m17

BHUHINI REALTY LLC. Filed with SSNY on 02/03/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 16 CRESCENT DR, ALBERTSON, NY 11507. Purpose: Any Lawful
20926 f10-Tu m17

BRIDGE MARINE LLC. Filed with SSNY on 12/17/2025. Office: Bronx County. SSNY designated as agent for process & shall mail to: 673 CITY ISLAND AVE, BRONX, NY 10464. Purpose: Any Lawful
20904 f10-Tu m17

CARNES ASADAS EL BETO LLC. Filed with SSNY on 12/16/2025. Office: New York County. SSNY designated as agent for process & shall mail to: 1271 AVENUE OF THE AMERICAS, NEW YORK, NY 10020. Purpose: Any Lawful
20914 f10-Tu m17

CREMATION TRACKER LLC. Filed with SSNY on 01/30/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 1364 SALLY CT, EAST MEADOW, NY 11554. Purpose: Any Lawful
20909 f10-Tu m17

IBROWJUNKIE, LLC. Arts. of Org. filed with the SSNY on 01/23/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 3080 Driftwood Lane, Bellmore, NY 11710. Purpose: Any lawful purpose.
20870 f10-Tu m17

LIMITED LIABILITY ENTITIES

LEZAH ENTERPRISES LLC. Filed with SSNY on 02/02/2026. Office: New York County. SSNY designated as agent for process & shall mail to: 16 SAINT NICHOLAS PL, NEW YORK, NY 10031. Purpose: Any Lawful
20916 f10-Tu m17

MATATOVA LAW, PLLC. Arts. of Org. filed with the SSNY on 12/09/25. Office: Nassau County. SSNY designated as agent of the PLLC upon whom process against it may be served. SSNY shall mail copy of process to the PLLC, 159-29 Rockaway Boulevard, Jamaica, NY 11434. Purpose: For the practice of the profession of Law.
20867 f10-Tu m17

MERRICK INDUSTRIES LLC. Arts. of Org. filed with the SSNY on 01/16/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 528 Merrick Road, Rockville Centre, NY 11570. Purpose: Any lawful purpose.
20869 f10-Tu m17

METROPOLITAN 60TH STREET LLC. Filed with SSNY on 01/22/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 137 BUSCHER AVE, VALLEY STREAM, NY 11580. Purpose: Any Lawful
20923 f10-Tu m17

NRNR PROPERTIES, LLC. Filed with SSNY on 04/28/2025. Office: Nassau County. SSNY designated as agent for process & shall mail to: 320 OLD COUNTRY RD STE 103, GARDEN CITY, NY 11530. Purpose: Any Lawful
20910 f10-Tu m17

OUR LADY OF PITY APARTMENTS LLC Articles of Org. filed NY Sec. of State (SSNY) 2/17/2021. Office in Bronx Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to c/o Comerford & Dougherty, 1122 Franklin Ave., Ste. 406, Garden City, NY 11530. Purpose: Any lawful purpose.
20883 f10-Tu m17

PHANTOM CAP HOLDINGS 206 LLC. Filed with SSNY on 01/27/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 825 NORTHERN BLVD, STE 303, GREAT NECK, NY 11021. Purpose: Any Lawful
20925 f10-Tu m17

PHANTOM NYC HOLDINGS LLC. Filed with SSNY on 01/28/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 825 NORTHERN BLVD, STE 303, GREAT NECK, NY 11021. Purpose: Any Lawful
20927 f10-Tu m17

STEPHEN PARISI LLC. Filed with SSNY on 02/04/2026. Office: Nassau County. SSNY designated as agent for process & shall mail to: 2960 KINLOCH RD, WANTAGH, NY 11793. Purpose: Any Lawful
20906 f10-Tu m17

T5 PROPERTY HOLDINGS LLC. Arts. of Org. filed with SSNY 1/22/26. Office: NY County. SSNY designated as agent for service of process. SSNY shall mail a copy of any process to: c/o CT Corporation System, 28 Liberty St., NY, NY 10005. Purpose: Any lawful activity.
20887 f10-Tu m17

WHEELS 7, LLC. Filed with SSNY on 02/02/2026. Office: New York County. SSNY designated as agent for process & shall mail to: 1 IRVING PL, #P14E, NEW YORK, NY 10003. Purpose: Any Lawful
20917 f10-Tu m17

107 ST MARKS, LLC Articles of Org. filed NY Sec. of State (SSNY) 1/29/26. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 224 West 35th St., NY, NY 10001, which is also the principal business location. Purpose: Any lawful purpose.
20541 f3-Tu m10

155-163 E 92, LLC Articles of Org. filed NY Sec. of State (SSNY) 1/29/26. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 224 West 35th St., NY, NY 10001, which is also the principal business location. Purpose: Any lawful purpose.
20583 f3-Tu m10

185 AVE C, LLC Articles of Org. filed NY Sec. of State (SSNY) 1/29/26. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 224 West 35th St., NY, NY 10001, which is also the principal business location. Purpose: Any lawful purpose.
20542 f3-Tu m10

1352 DICKENS LLC. Filed 1/22/2026. Office: Nassau Co. SSNY designated as agent for process & shall mail to: PO BOX 651, LAWRENCE, NY 11559. Purpose: General.
20566 Feb3 tu Mar10

LIMITED LIABILITY ENTITIES

190 W 10, LLC Articles of Org. filed NY Sec. of State (SSNY) 1/29/26. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 224 West 35th St., NY, NY 10001, which is also the principal business location. Purpose: Any lawful purpose.
20585 f3-Tu m10

212 EAST 72 STREET REALTY LLC Articles of Org. filed NY Sec. of State (SSNY) 12/29/25. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 29 Broadway, 25th Fl., NY, NY 10006. Purpose: Any lawful purpose.
20593 f3-Tu m10

251 W19 9D, LLC Articles of Org. filed NY Sec. of State (SSNY) 10/21/25. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 251 West 19th St., Apt. 9D, NY, NY 10011, which is also the principal business location. Purpose: Any lawful purpose.
20590 f3-Tu m10

303 W 11, LLC Articles of Org. filed NY Sec. of State (SSNY) 1/29/26. Office in NY Co. SSNY desig. agent of LLC whom process may be served. SSNY shall mail process to 224 West 35th St., NY, NY 10001, which is also the principal business location. Purpose: Any lawful purpose.
20584 f3-Tu m10

MYRTLE 4 LLC Art. Of Org. Filed Sec. of State of NY 1/16/2026. Off. Loc.: Nassau Co. SSNY designated as agent upon whom process against it may be served. SSNY to mail copy of process to, c/o Kenneth Schuckman, 120 North Village Avenue, Rockville Centre, NY 11570, USA. Any lawful act or activity.
20544 f3-Tu m10

SHORE DRIVE GROUP LLC. Arts. of Org. filed with the SSNY on 01/23/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 16 Shore Drive, Great Neck, NY 11024. Purpose: Any lawful purpose.
20597 f3-Tu m10

UBG CAPITAL LLC, Arts. of Org. filed with the SSNY on 01/28/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: The LLC, 7 Bayberry Rdg, Roslyn, NY 11576. Purpose: Any Lawful Purpose.
20586 f3-Tu m10

LIVING WHITE PLAINS LLC. Authority Filed 1/21/2026. Office : Westchester Co. Formed in DE 11/24/2025. SSNY designated as agent for process & shall mail to: 36 AIRPORT RD. SUITE 307, LAKEWOOD, NY 08701. Principal business address: 17032 MINOS CONAWAY RD LEWES DE 19958. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
20564 Feb3 tu Mar10

Formation of LUCEY KERNO LLC filed with the Secy. of State of NY (SSNY) on 1/7/2026. Office loc.: NY County. SSNY designated as agent of LLC upon whom process against it may be served. The address SSNY shall mail process to Brian Lucey, 2017 E. 25th Ave., Denver, CO 80205. Purpose: Any lawful activity.
19626 f10-Tu m17

12 CRANBERRY LLC. Arts. of Org. filed with the SSNY on 01/02/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 2 Fairbanks Court, Woodbury, NY 11797. Purpose: Any lawful purpose.
19655 j13-Tu f17

ABDUL AND SONS CONTRACTING LLC. Arts. of Org. filed with the SSNY on 12/22/25. Office: Bronx County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 79 Radford Street, Yonkers, NY 10705. Purpose: Any lawful purpose.
19661 j13-Tu f17

BEDFORD MULTIFAMILY, LLC. Arts. of Org. filed with the SSNY on 11/06/25. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 117 Frederick Avenue, Bellmore, NY 11710. Purpose: Any lawful purpose.
19652 j13-Tu f17

GRAIN STRATEGIC ADVISORY, LLC Filed 12/17/25 Office: New York Co. SSNY designated as agent for process & shall mail to: 121 Reade St, #3F, New York, NY 10013 Purpose: all lawful
18879 j13-Tu f17

LIMITED LIABILITY ENTITIES

LENORA ENTERPRISES LLC. Arts. of Org. filed with the SSNY on 12/22/25. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 67 McAlester Avenue, Hicksville, NY 11801. Purpose: Any lawful purpose
19656 j13-Tu f17

LOGUE RESIDENTIAL, LLC. Arts. of Org. filed with the SSNY on 11/06/25. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 117 Frederick Avenue, Bellmore, NY 11710. Purpose: Any lawful purpose.
19653 j13-Tu f17

148 GREENBELT LLC. Arts. of Org. filed with the SSNY on 01/06/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 69 Scudders Lane, Glen Head, NY 11545. Purpose: Any lawful purpose.
19955 j20-Tu f24

A.K. PAPSON ARTWORKS LLC. Arts. of Org. filed with the SSNY on 01/07/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 160 Cold Spring Road, Syosset, NY 11791. Purpose: Any lawful purpose.
19957 j20-Tu f24

ALLIED XXXVII LLC. Arts. of Org. filed with the SSNY on 09/09/25. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, c/o Allied Realty & Development Corp., P.O. Box 231027, Great Neck, NY 11023. Purpose: Any lawful purpose.
19956 j20-Tu f24

A Notice of Formation of WDJ Management LLC, Art. of Org. filed Secy. of State of NY (SSNY) on 10/30/2025. Office location: Nassau County. SSNY Designated as agent of LLC upon whom process against it may be served. SSNY shall mail copy of process to: The LLC, 1 Manor Ave, Roslyn Heights, NY 11577. Purpose: any lawful activity.
19900 j20-Tu f24

A Notice of Formation of WOWO Holding LLC, Art. of Org. filed Secy. of State of NY (SSNY) on 10/31/2025. Office location: Nassau County. SSNY Designated as agent of LLC upon whom process against it may be served. SSNY shall mail copy of process to: The LLC, 1 Manor Ave, Roslyn Heights, NY 11577. Purpose: any lawful activity.
19899 j20-Tu f24

MEYANG LEGACY, LLC, Arts. of Org. filed with the SSNY on 01/16/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: The LLC, 66 Broadway, Garden City Park, NY 11040. Purpose: Any Lawful Purpose.
19961 j20-Tu f24

PAMELA MORRISON VENTURES LLC, Arts. of Org. filed with the SSNY on 01/14/2026. Office loc: NY County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: Pamela Morrison, 140 West End Avenue, Suite 1J, NY, NY 10023. Purpose: Any Lawful Purpose.
19987 j20-Tu f24

16 POPLAR LLC. Arts. of Org. filed with the SSNY on 01/16/26. Office: Nassau County. SSNY designated as agent of the LLC upon whom process against it may be served. SSNY shall mail copy of process to the LLC, 181 Westbury Avenue, Mineola, NY 11501. Purpose: Any lawful purpose.
20151 j27-Tu m3

ENROSE LLC, Arts. of Org. filed with the SSNY on 01/09/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: Gabrielle Feliciano, 18 Cheshire Rd, Bethpage, NY 11714. Purpose: Any Lawful Purpose.
20259 j27-Tu m3

HOSPITALITY HOLDINGS GROUP LLC, Arts. of Org. filed with the SSNY on 01/23/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: The LLC, 28 Marion Street, Greenvale, NY 11548. Purpose: Any Lawful Purpose.
20286 j27-Tu m3

NAYA 750 COLUMBUS LLC, Art. of Org. filed NY DOS 7/29/24, NY Co.S/S C/O The LLC 54 W 56th St, NY, NY 10019.To engage in any lawful act or activity. Managed by 1 or more Managers. Perpetual existence. Full indemnification.
20313 j27-Tu m3

PUBLIC NOTICES

The 2026 National Audubon Society Annual Meeting of Members will take place on Tuesday, March 3rd, 2026, at 3:30pm ET in the Conference Center located at 1707 L Street NW, Washington DC 20036.
20306 f10-W f24

SALES

NOTICE OF LEGAL POSTPONEMENT OF SALE

SUPREME COURT COUNTY OF BRONX, NYCTL 1998-2 TRUST AND THE BANK OF NEW YORK MELLON AS COLLATERAL AGENT AND CUSTODIAN, Plaintiff, vs. PAUL LUPO, ET AL., Defendant(s). Pursuant to a Judgment of Foreclosure and Sale dated May 25, 2022 and duly entered on May 27, 2022; an Amended Judgment of Foreclosure and Sale dated November 16, 2022 and duly entered on November 23, 2022; and an Order Amending the Amended Judgment of Foreclosure and Sale to Appoint a Substitute Referee dated and duly entered on June 27, 2025, I, the undersigned Referee will sell at public auction at the Bronx County Supreme Court, Courtroom 711, 851 Grand Concourse, Bronx, NY on February 23, 2026 at 2:15 p.m., all that certain plot, piece or parcel of land, with the buildings and improvements thereon erected, situate, lying and being in the Borough and County of Bronx, City and State of New York, Block 5529 and Lot 801. Said premises may also be known as No # Schuyler Terrace, Bronx, NY. Approximate amount of judgment is $3,653.84 plus interest and costs. Premises will be sold subject to provisions of filed Judgment and Terms of Sale. Index #27624/2019E. The original sale was scheduled for January 26, 2026 at the same time and location. Ola M. Azeez, Esq., Referee The Law Office of Thomas P. Malone, PLLC, 100 Park Avenue, 16th Floor, New York, New York 10017, Attorneys for Plaintiff
20929 f17-Tu-1t

SUPREME COURT - COUNTY OF NEW YORK. WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, on behalf of the registered holders of Morgan Stanley Capital I Trust 2016-UBS12 Commercial Mortgage Pass-Through Certificates, Series 2016-UBS12 and on behalf of the holders of any Related Serviced Subordinate Companion Loan or Serviced Companion Loan, acting by and through its special servicer, Rialto Capital Advisors, LLC, Plaintiff, v. 681 FIFTH AVENUE LLC, et al., Defendant(s), Index No. 650142/2024. Pursuant to a Judgment of Foreclosure and Sale entered and dated December 30, 2025, under NYSCEF No. 424 (the "Judgment"), the undersigned Referee will sell at public auction to the highest bidder in Room 252 of the New York County Courthouse, 60 Centre Street, New York, NY 10007, on March 3, 2026 at 2:15 p.m. (prevailing Eastern Time), the property in said Judgment directed to be sold, which property may be briefly described as the real property located in the Borough of Manhattan, within the City, State and County of New York, and designated as Block 1289, Lot 72, together with the premises, fixtures, improvements, equipment, related personal property located thereon, and other rights or interests of any kind or nature, as more particularly described in the Judgment. Said premises are known as 681 Fifth Avenue, New York, NY 10022 Approximate amount of Judgment is $261,853,093.80 plus interest & costs. Premises will be sold subject to provisions of filed Judgment and Terms of Sale, as referenced therein, which are available from Plaintiff's counsel upon request. Participating bidders, other than Plaintiff or its successors or assigns, must place a bid deposit in the amount of $100,000 with the Referee by certified bank check at or before the start of the sale. After the Referee accepts the high bid offered by a bidder, the successful bidder must immediately pay to the Referee by certified bank check ten percent (10%) of the sum bid and shall execute Terms of Sale for the purchase of the Property, unless such successful bidder is Plaintiff or its successors or assigns. JOSHUA STEIN, ESQ., Referee VENABLE LLP Attorney(s) for Plaintiff, 151 W. 42nd Street, 49th Floor, New York, NY 10036, (212) 370-6257, Attention: Rishi Kapoor, Esq.
20009 j27-Tu f17

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of MILLER CONTINENTAL LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 5/7/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 95 Horatio St, Apt 6D, New York, NY 10014. Purpose: any lawful act.
20502 F10 T M17

NOTICE OF FORMATION of Fatty Little One LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/17/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 28 W 12th St, Apt 3, New York, NY 10011. Purpose: any lawful act.
20511 F03 T M10

AMH PORTFOLIO MANAGEMENT LLC. Filed 12/30/2025. Office: Nassau Co. SSNY designated as agent for process & shall mail to: 438 CENTRAL AVENUE 2ND FL FRONT, CEDARHURST, NY 11516. Purpose: General.
19967 Jan20 tu Feb24

CHAN CONSULTANTS, LLC. Filed 12/23/2025. Office: Nassau Co. SSNY designated as agent for process & shall mail to: 303 SYOSSET WOODBURY ROAD, WOODBURY, NY 11797. Purpose: General.
19970 Jan20 tu Feb24

LIMITED LIABILITY ENTITIES

ROYCE SYRACUSE LLC. Authority Filed 8/5/2022. Office : Nassau Co. Formed in DE 8/5/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DOVER DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19984 Jan20 tu Feb24

SHMINTO HOLDINGS LLC. Filed 2/15/2022. Office: Nassau Co. SSNY designated as agent for process & shall mail to: 532 WOODMERE BLVD, WOODMERE, NY 11598. Purpose: General.
19973 Jan20 tu Feb24

SHMINTO SYRACUSE LLC. Authority Filed 9/12/2022. Office : Nassau Co. Formed in DE 9/9/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19977 Jan20 tu Feb24

SOLO AT GREENWAY PLACE LLC. Authority Filed 8/2/2022. Office : Nassau Co. Formed in DE 8/1/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DOVER DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19982 Jan20 tu Feb24

SYM SYRACUSE LLC. Filed 5/23/2022. Office: Nassau Co. SSNY designated as agent for process & shall mail to: RIVKIN RADLER LLP, 926 RXR PLAZA, UNIONDALE, NY 11556. Purpose: General.
19974 Jan20 tu Feb24

TVP DOVER I, LLC. Authority Filed 8/25/2022. Office : Nassau Co. Formed in DE 8/24/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DOVER DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19981 Jan20 tu Feb24

WARRIORPASTE LLC. Filed 12/16/2025. Office: Nassau Co. SSNY designated as agent for process & shall mail to: 78 GROVE AVE , CEDARHURST, NY 11516. Purpose: General.
19972 Jan20 tu Feb24

Anabia Wellness LLC filed w/ SSNY 12/30/25. Off. in Nassau Co. Process served to SSNY - desig. as agt. of LLC & mailed to the LLC, 88 Broadway, Hicksville, NY 11801. Any lawful purpose.
20044 Jan27 tu Mar3

BECHARD PROPERTIES LLC Arts of Org. filed SSNY 1/9/2026 New York Co. SSNY design agent for process & shall mail to 41 STATE ST, # 112, ALBANY, NY, 12207 General Purpose
20277 Jan27 tu Mar3

BETTER IN BLUE LLC Arts of Org. filed SSNY 1/8/2026 New York Co. SSNY design agent for process & shall mail to 41 STATE ST, # 112, ALBANY, NY, 12207 General Purpose
20272 Jan27 tu Mar3

EDWARD OO LLC Arts of Org. filed SSNY 1/6/2026 New York Co. SSNY design agent for process & shall mail to 79 MACDOUGAL ST, 24, NEW YORK, NY, 10012 General Purpose
20271 Jan27 tu Mar3

EMBC LLC filed w/ SSNY 12/30/25. Off. in NY Co. Process served to SSNY - desig. as agt. of LLC & mailed to the LLC, 316 West 118th St, 4th Fl., NY, NY 10026. Any lawful purpose.
20052 Jan27 tu Mar3

FAITH CELESTE MCCARTHY LLC Arts of Org. filed SSNY 10/16/2025 New York Co. SSNY design agent for process & shall mail to 41 STATE ST, # 112, ALBANY, NY, 12207 General Purpose
20270 Jan27 tu Mar3

HIGH LINE LABS LLC Arts of Org. filed SSNY 10/28/2025 New York Co. SSNY design agent for process & shall mail to 41 STATE ST, # 112, ALBANY, NY, 12207 General Purpose
20269 Jan27 tu Mar3

JXZ GROUP LLC Arts of Org. filed SSNY 1/14/2026 New York Co. SSNY design agent for process & shall mail to 35-08 146TH ST, 7D, FLUSHING, NY, 11354 General Purpose
20274 Jan27 tu Mar3

NAILMANSION11683 LLC Arts of Org. filed SSNY 1/9/2026 New York Co. SSNY design agent for process & shall mail to 320 EAST 91ST ST, NEW YORK, NY, 10128 General Purpose
20273 Jan27 tu Mar3

NY NIX LLC Arts of Org. filed SSNY 1/13/2026 New York Co. SSNY design agent for process & shall mail to 107 WEST 68TH ST, APT 5E, NEW YORK, NY, 10023 General Purpose
20275 Jan27 tu Mar3

PHOTOGRAPHY DESIGN BY MATT LLC Arts of Org. filed SSNY 1/9/2026 Bronx Co. SSNY design agent for process & shall mail to 41 STATE ST, # 112, ALBANY, NY, 12207 General Purpose
20268 Jan27 tu Mar3

NAYA WALL STREET LLC, Art. of Org. filed NY DOS 7/27/23, NY Co. S/S C/O The LLC 54 W 56th St, NY, NY 10019.To engage in any lawful act or activity. Managed by 1 or more Managers. Perpetual existence. Full indemnification.
20321 j27-Tu m3

69 GOLD JV LLC. Filed 12/29/2025. Office: New York Co. SSNY designated as agent for process & shall mail to: 146 W 29TH STREET RM 8E, NEW YORK, NY 10001. Purpose: General
19969 Jan20 tu Feb24

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of Sole Vault LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 6/5/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 2461 East 29th Street, Apt 4P, Brooklyn, NY 11235. Purpose: any lawful act.
20555 F03 T M10

NOTICE OF FORMATION of SQUISH LABS LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 2/01/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 130 W 15th St, 12M, New York, NY 10011. Purpose: any lawful act.
20505 F03 T M10

NOTICE OF FORMATION of The Elysabeth 4-E LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/20/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to Berenthal & Associates, P.C., 45 East 72nd Street, Unit 5C, New York, NY 10021. Purpose: any lawful act.
20504 F03 T M10

NOTICE OF FORMATION of Alvarya 888 LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 9/18/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to Bilqis Coffee, 8018 5th Ave, BK, NY 11209. R/A: Dzair Braktia, 416 68th St, Apt 6B, BK, NY 11220. Purpose: any lawful act.
18692 F10 T M17

NOTICE OF FORMATION of A UNIQUE PLACE LIMITED LIABILITY COMPANY. Arts of Org filed with Secy. of State of NY (SSNY) on 9/18/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 160 Madison St, Apt 8B, New York, NY 10002. Purpose: any lawful act.
20011 F10 T M17

NOTICE OF FORMATION of BUNKER OTR LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 2/28/2025. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 398 Bunker Dr, Oceanside, NY 11572. Purpose: any lawful act or activity.
20878 F10 T M17

NOTICE OF FORMATION of CAZERA LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/6/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 1212 5th Ave, New York, NY 10029. P/B/A: 459 Columbus Ave, #4049, New York, NY 10024. Purpose: any lawful act.
20911 F10 T M17

NOTICE OF FORMATION of CHARITY CHALLENGE EVENTS LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/3/2019. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 3000 Marcus Avenue, Suite 1W5, Lake Success, NY 11042. Purpose: any lawful act.
20734 F10 T M17

NOTICE OF FORMATION of Cirillo Wealth Advisory, LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/13/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 140 West End Avenue, #2D, New York, NY 10023. Purpose: any lawful act.
20888 F10 T M17

NOTICE OF FORMATION of G MADINA OUMAROU L LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/24/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 440 E 105th St Apt 5A, New York, NY 10029. R/A: US Corp Agents, Inc. 7014 13th Ave, #202, BK, NY 11228. Purpose: any lawful act.
20862 F10 T M17

NOTICE OF FORMATION of KEYWAY MANAGEMENT LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 9/18/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 228 Park Ave S PMB 136267, New York, NY 10003. R/A: US Corp Agents, Inc. 7014 13th Ave, #202, BK, NY 11228. Purpose: any lawful act.
20866 F10 T M17

NOTICE OF FORMATION of KILGORE STUDIO, LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/27/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 225 W 36th Street, #609, New York, NY 10018. Purpose: any lawful act.
20876 F10 T M17

DLG SYRACUSE, LLC. Authority Filed 8/23/2022. Office : Nassau Co. Formed in DE 8/23/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19979 Jan20 tu Feb24

DITMAS TIC MEMBER LLC. Authority Filed 9/13/2022. Office : Nassau Co. Formed in DE 9/14/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, SUITE B, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DOVER DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19980 Jan20 tu Feb24

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of The Sprinkled Scoop LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 12/17/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 228 Park Ave S #169590, New York, NY 10003. R/A: US Corp Agents, Inc. 7014 13th Ave, #202, BK, NY 11228. Purpose: any lawful act.
20863 F10 T M17

NOTICE OF FORMATION of Jewish Muscle LLC. Arts of Org. filed with NY Secy of State (SSNY) on 1/30/26. Office location: Nassau County. SSNY is designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 187 Wolf Rd, Ste 101, Albany, NY 12205. The name and address of the Reg. Agent is Business Filings Incorporated, 187 Wolf Rd, Ste 101, Albany, NY 12205. Purpose: any lawful activity.
21108 f17-Tu f24

NOTICE OF FORMATION HW HOSPITALITY MB LLC, Arts. of Org. filed with the SSNY on 01/29/2026. Office loc: Nassau County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: The LLC, 420 Great Neck Road, Great Neck, NY 11021. Purpose: Any Lawful Purpose.
20568 f3-Tu m10

NOTICE OF FORMATION MGS SS OF WESTCHESTER, LLC, Arts. of Org. filed with the SSNY on 01/29/2026. Office loc: Westchester County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: The LLC, 98 Edgewood Ave, Larchmont, NY 10538. Reg Agent: Adam Goldsmith, 98 Edgewood Ave, Larchmont, NY 10538. Purpose: Any Lawful Purpose.
20567 f3-Tu m10

NOTICE OF FORMATION Notice of Formation of Avenir Management LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 10/16/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served SSNY shall mail process to: INCORP SERVICES, INC., ONE COMMERCE PLAZA, 99 WASHINGTON AVE., STE. 805A, ALBANY, NY 12210-2822, also the registered agent upon whom process may be served. Purpose: any lawful activities.
20572 f3-Tu m10

NOTICE OF FORMATION of 249 Grange Street LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/16/2026. Officelocation: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: the Company, 1009 West Beech St., Long Beach, NY 11561. Purpose: any lawful activities.
20546 f3-Tu m10

NOTICE OF FORMATION of 401NYC LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/14/2026. Office location: Nassau County. SSNY designated as agent of LLC uponwhom process against it may be served. SSNY shall mail process to: c/o Meltzer, Lippe, Goldstein & Breitstone, LLP, 190 Willis Ave., Mineola, NY 11501, Attn: David Heymann, Esq. Purpose: any lawful activities.
20560 f3-Tu m10

NOTICE OF FORMATION of BK PMA SERVICES LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/14/2026. Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: c/o Meltzer, Lippe, Goldstein & Breitstone, LLP, 190 Willis Ave., Mineola, NY 11501, Attn: David Heymann, Esq. Purpose: any lawful activities.
20561 f3-Tu m10

NOTICE OF FORMATION of Blue Wind Holdings LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/15/2026.Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 531 Split Rock Rd., Syosset, NY 11791. Purpose: any lawful activities.
20562 f3-Tu m10

NOTICE OF FORMATION of Border363 LLC, amended to: 304 Bleecker LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/13/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: c/o Law Firm of Seth Stein P.C., 120 Broadway, 28th Fl., New York, NY 10271. Purpose: any lawful activities.
20550 f3-Tu m10

NOTICE OF FORMATION of CENTURY INFRASTRUCTURE LLC. Arts of Org. filed with Secy. of State of NY (SSNY) on 10/16/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: INCORP SERVICES, INC., ONE COMMERCE PLAZA, 99 WASHINGTON AVE., STE. 805A, ALBANY, NY 12210-2822, also the registered agent upon whom process may be served. Purpose: any lawful activities.
20574 f3-Tu m10

NOTICE OF FORMATION of GARI 401NYC LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/14/2026. Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: c/o Meltzer, Lippe, Goldstein & Breitstone, LLP, 190 Willis Ave., Mineola, NY 11501, Attn: David Heymann, Esq. Purpose: any lawful activities.
20563 f3-Tu m10

ROGO REVIVE LLC. Filed 1/8/2026. Office: Westchester Co. SSNY designated as agent for process & shall mail to: 8 COOLIDGE AVE, WHITE PLAINS, NY 10606. Purpose: General.
19962 Jan20 tu Feb24

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of gk Amsterdam NYC LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/09/2026. Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: the Company, 1306 East Imperial Ave.,El Segundo, CA 90245, Attn: Harsh Chowdhary. Purpose: any lawful activities.
20547 f3-Tu m10

NOTICE OF FORMATION of Ingalls Asset Management, LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/21/2026. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: c/o Christian C. Park, 1 Rockefeller Plaza, New York, NY 10020. Purpose: any lawful activities.
20554 f3-Tu m10

NOTICE OF FORMATION of Riverside 1795 Associates, L.L.C. Arts. of Org. filed with Secy. of State of NY (SSNY) on 05/07/1997. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 156 William St., New York, NY 10005. Purpose: any lawful activities.
20575 f3-Tu m10

NOTICE OF FORMATION PARALLAX CAPITAL LLC, Arts. of Org. filed with the SSNY on 01/29/2026. Office loc: NY County. SSNY has been designated as agent upon whom process against the LLC may be served. SSNY shall mail process to: Surgicore, 505 Park Avenue, Suite 1700, NY, NY 1002. Purpose: Any Lawful Purpose.
20569 f3-Tu m10

NOTICE OF FORMATION of 87GC EQUITES, LLC. Arts. Of Org. filed with SSNY on 01/26/2026. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to 100 SCHOOLHOUSE RD, LEVITTOWN, NY 11756. Any lawful purpose.
20846 Feb10 tu Mar17

NOTICE OF FORMATION of BARBERRY ROSE REALTY LLC. Arts. Of Org. filed with SSNY on 01/28/2026. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to ATTN: MARC A. LANDIS, ESQ., 485 LEXINGTON AVENUE, NEW YORK, NY 10017. Any lawful purpose.
20850 Feb10 tu Mar17

NOTICE OF FORMATION of DK CAPITAL ASSETS LLC. Arts. Of Org. filed with SSNY on 02/02/2026. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to 600 MAMARONECK AVENUE, #400, HARRISON, NY 10528. Any lawful purpose.
20835 Feb10 tu Mar17

NOTICE OF FORMATION of JDM OPPORTUNITY FUND LLC. Arts. Of Org. filed with SSNY on 03/12/2021. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to PO BOX 60, ROSYLN, NY 11576. Any lawful purpose.
20838 Feb10 tu Mar17

NOTICE OF FORMATION of KP X11 FIRST AVE LLC Arts. of Org. filed with Secy. of State of NY (SSNY) on 02/03/26. Office location: Nassau County. Princ. office of LLC: 520 E Shore Rd., Great Neck, NY 11024. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to Corporation Service Co., 80 State St., Albany, NY 12207-2543. Purpose: Any lawful activity.
20861 Feb10 tu Mar17

NOTICE OF FORMATION of NORTH STAR TRANSPORTATION GROUP LLC Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/19/25. Office location: Nassau County. Princ. office of LLC: 23 Garden Pl., Hempstead, NY 11550. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to the LLC at the addr. of its princ. office. The regd. agent of the company upon whom and at which process against the company can be served is U.S. Corporation Agents, Inc., 7014 13th Ave., Ste. 202, Brooklyn, NY 11228. Purpose: Any lawful activity.
20860 Feb10 tu Mar17

NOTICE OF FORMATION of PREMIER WAYROLL, LLC. Arts. Of Org. filed with SSNY on 01/21/2026. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to 18 UNQUA ROAD, MASSAPEQUA, NY 11758. Any lawful purpose.
20842 Feb10 tu Mar17

NOTICE OF FORMATION of TASTY CMD, LLC. Arts. Of Org. filed with SSNY on 01/20/2026. Office location: Nassau SSNY desg. as agent of LLC upon whom process against it may be served. SSNY mail process to 100 JERICHO QUADRANGLE, STE 140 , JERICHO, NY 11753. Any lawful purpose.
20857 Feb10 tu Mar17

NOTICE OF FORMATION of ZEN-NOH AMERICA FOOD TRADING LLC. Arts. Of Org. filed with SSNY on 01/07/2026. Office location: NEW YORK. SSNY desg. As agent of LLC upon whom process against it may be served. SSNY mail process to 1270 AVENUE OF THE AMERICAS, SUITE 208, NEW YORK, NY 10020. Any lawful purpose.
20882 Feb10 tu Mar17

NOTICE OF FORMATION of IMMACULATE MANAGEMENT GROUP LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 8/20/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 1221 E 305th St, Willowick, OH 44092. Purpose: any lawful act.
19563 J13 T F17

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of SKYSCRAPER PARTNERS LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 12/17/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 457 W 22nd St, Apt A, New York, NY 10011. Purpose: any lawful act.
19459 J13 T F17

NOTICE OF FORMATION of STYLE HOSPITALITY LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 11/17/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 91 Attorney St, Apt 6D, New York, NY 10002. Purpose: any lawful act.
19560 J13 T F17

NOTICE OF FORMATION of THIRD COAST LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/29/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 169 Bleecker St, New York, NY 10012. Purpose: any lawful act.
19549 J13 T F17

NOTICE OF FORMATION of WILSON PAYMENT LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 12/26/2025. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to Yanfei Chen, 43 Wood Rd, Great Neck, NY 11024. Purpose: any lawful act.
19565 J13 T F17

NOTICE OF FORMATION of Annalia 33, LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/18/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: c/o Alpine Capital Bank, 680 Fifth Ave., 7th Fl., New York, NY 10019, Attn: Annalia Spanou. Purpose: any lawful activities.
19599 j13-Tu f17

NOTICE OF FORMATION of Audacity 100 Disruptors LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/17/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 721 Fifth Ave., Apt. 30F, New York, NY 10022. Purpose: any lawful activities.
19611 j13-Tu f17

NOTICE OF FORMATION of Bramshill New York Trading LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/17/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: Global Virtual Agent Services, LLC, 1 East High St., Ballston Spa, NY 12020. Purpose: any lawful activities.
19614 j13-Tu f17

NOTICE OF FORMATION of Deb Resnick Consulting LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/15/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: 345 West 13th Street, Apt. 1E, New York, NY 10014. Purpose: any lawful activities.
19617 j13-Tu f17

NOTICE OF FORMATION of MOTIVES 525 NY LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/29/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: ROBYN STOTTER, 525 7TH AVE. NO. 1502, NEW YORK, NY 10018. Purpose: any lawful activities.
19598 j13-Tu f17

NOTICE OF FORMATION of TCO: The Chosen Ones, LLC. Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/17/2025. Office location: New York County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to: Robert John Rivera Jr., 254 East 2nd St., New York, NY 10009. Purpose: any lawful activities.
19621 j13-Tu f17

NOTICE OF FORMATION of BROCK's golden coffee LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 9/29/2025. Office location: BX County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 3826 Laconia Ave, Bronx, NY 10469. R/A: US Corp Agents, Inc. 7014 13th Ave, #202, BK, NY 11228. Purpose: any lawful act.
18305 J20 T F24

NOTICE OF FORMATION of DSK FIRE & SECURITY LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 6/21/2023. Office location: BX County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 3127 Gunther Ave, Bronx, NY 10469. Purpose: any lawful act.
19191 J20 T F24

NOTICE OF FORMATION of HEALTHTEACH SLB LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/5/2026. Office location: Nassau County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 5 Martin Lane, Old Bethpage, NY 11804. Purpose: any lawful act.
19871 J20 T F24

NOTICE OF FORMATION of Maya Singh Photography LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 10/29/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 389 E 89th Street, New York, NY 10128. Purpose: any lawful act.
19952 J20 T F24

LIMITED LIABILITY ENTITIES

NOTICE OF FORMATION of HPPM LLC (the "LLC") filed with the Secretary of State of the State of New York ("SSNY") on 11/19/2025. Office location: New York County. The principal business address of the LLC is: One Liberty Plaza, New York, New York 10006. SSNY has been designated as the agent of the LLC upon whom process against it may be served. SSNY shall mail service of process to HPPM LLC C/O NYCEDC, One Liberty Plaza, 14TH Floor, Attn: General Counsel, New York, New York 10006. Purpose: any lawful purpose.
19650 J27 T M03

NOTICE OF FORMATION of Inflection Advisory LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/2/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to Apt 7N, 300 East 71st Street, New York, NY 10021. Purpose: any lawful act.
20161 J27 T M03

Notice of Formation of LeCompote, LLC. Arts of Org filed with SSNY on 12/27/2025. Office loc: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process to the LLC, 1578 Third Ave, Ste 172, NY, NY 10128. Purpose: Any lawful activity.
20110 J27 T M03

NOTICE OF FORMATION of MIMI AGENCY LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 1/06/2026. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 309 5th Avenue, Apt 3E, New York, NY 10016. Purpose: any lawful act.
20292 J27 T M03

NOTICE OF FORMATION of RoDo Trades LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 11/26/2025. Office location: BX County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 258 Emerson Ave, Throggs Neck, NY 10465-3115. Purpose: any lawful act.
20120 J27 T M03

NOTICE OF FORMATION of The Tunnel Apartments LLC. Arts of Org filed with Secy. of State of NY (SSNY) on 4/2/2025. Office location: NY County. SSNY designated as agent upon whom process may be served and shall mail copy of process against LLC to 210 W 15th St, New York, NY 10011. Purpose: any lawful act.
20150 J27 T M03

NOTICE OF FORMATION of COLONY LAKES ACQUISITION, LLC Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/16/26. Office location: NY County. Princ. office of LLC: 30 Hudson Yards, 72nd Fl., NY, NY 10001. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to Corporation Service Co., 80 State St., Albany, NY 12207. Purpose: Any lawful activity.
20298 Jan27 tu Mar3

NOTICE OF FORMATION of IDYLLIC DESIGNS LLC. Art. Of Org. filed with the Sect'y of State of NY (SSNY) on 11/20/25. Office in Nassau County. SSNY has been designated as agent of the LLC upon whom process against it may be served. SSNY shall mail process to the LLC, 100 W BROADWAY APT 6M LONG BEACH, NY, 11561. Purpose: Any lawful purpose
20261 Jan27 tu Mar3

NOTICE OF FORMATION of NOTORIOUS G, LLC Arts. of Org. filed with Secy. of State of NY (SSNY) on 01/22/26. Office location: Nassau County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to the LLC, Attn: Grand Accurso, 192 Aldershot Ln., Manhasset, NY 11030. Purpose: Any lawful activity.
20305 Jan27 tu Mar3

NOTICE OF FORMATION of RULE 257 LLC. Art. Of Org. filed with the Sect'y of State of NY (SSNY) on 06/12/25. Office in New York County. SSNY has been designated as agent of the LLC upon whom process against it may be served. SSNY shall mail process to the LLC, 54 ELDRIDGE ST NEW YORK, NY, 10002. Purpose: Any lawful purpose
20266 Jan27 tu Mar3

NOTICE OF FORMATION of SAMUDHRA NYC LLC Arts. of Org. filed with Secy. of State of NY (SSNY) on 12/15/25. Office location: NY County. SSNY designated as agent of LLC upon whom process against it may be served. SSNY shall mail process to Mangesh K Chinthamaneni, 21 West St., Apt. 16K, NY, NY 10006, regd. agent upon whom and at which process may be served. Purpose: Any lawful activity.
20301 Jan27 tu Mar3

45TH STREET BLT RESTAURANT LLC Arts. of Org. filed with SSNY on 3/1/2011. Off. Loc.: NEW YORK Co. SSNY desig. As agt. upon whom process may be served. SSNY shall mail process to: The LLC, 819 Avenue W, Brooklyn, NY 10022. General Purposes.
20793 w.o.

EZRAQ SYRACUSE LLC. Authority Filed 9/12/2022. Office : Nassau Co. Formed in DE 9/9/2022. SSNY designated as agent for process & shall mail to: 377 PEARSALL AVENUE, CEDARHURST, NY 11516. Principal business address: 800 NORTH STATE STREET SUITE 304 DOVER DE 19901. Cert. of LLC filed with Secy. of State of DE loc: 401 FEDERAL ST, STE 4, DOVER, DE 19901. Purpose: General.
19976 Jan20 tu Feb24

HORIZON CHIMNEY SERVICES - CLEANING & REPAIR LLC. Filed 12/23/2025. Office: Westchester Co. SSNY designated as agent for process & shall mail to: 411 THEODORE FREMD AVE STE 206, RYE, NY 10580. Purpose: General.
19971 Jan20 tu Feb24