

NESENOFF & MILTENBERG, LLP
363 Seventh Avenue, Fifth Floor
New York, NY 10001
(212) 736-4500

-and-

LAW OFFICES OF JAN MEYER & ASSOCIATES, P.C.
1029 Teaneck Road, Second Floor
Teaneck, NJ 07666
(201) 862-9500
Attorneys for Plaintiffs

WORLD MISSION SOCIETY CHURCH OF GOD,

Plaintiff,

vs.

MICHELLE COLON,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

Docket No.: L-3489-12

Civil Action

**NOTICE OF MOTION FOR PROTECTIVE
ORDER PURSUANT TO R. 4:10-
3(a),(b),(d)&(g)**

To: Paul S. Grosswald, Esq.
140 Prospect Avenue, Apt# 8S
Hackensack, NJ 07601
Attorney for Defendant Michelle Colon

PLEASE TAKE NOTICE that Plaintiff World Mission Society Church of God will apply to the above named Court located at 10 Main Street, Hackensack, NJ on October 25, 2013, at 9:00 a.m., before the Hon. Rachelle L. Harz, J.S.C. for a Order pursuant to R. 4:10-3(a),(b),(d)&(g) that certain discovery not be had and that responses to other discovery demands be subject to a Confidentiality Order. In support of this motion, Plaintiff will rely upon the attached Certification of Solomon Rubin, dated October 9, 2013, which is annexed to this Notice of Motion. A proposed form of Order is attached.

Pursuant to R. 1:6-2(d), the moving parties request oral argument in the event opposition is filed.

Dated: October 9, 2013

Law Offices of Jan Meyer & Associates, P.C.
Attorney for Plaintiff

By: 

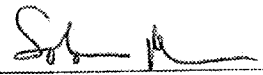
Solomon Rubin

Certification of Service

I, Solomon Rubin, certify:

1. On October 9, 2013, I caused a true copy of this notice of motion and supporting papers to be served on Paul S. Grosswald, Esq., counsel for the Defendant Michelle Colon, by sending it by e-mail at pgrosswald@hotmail.com.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Solomon Rubin

Dated: October 9, 2013