

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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JERRY CADIGAN and NANCY CATON CADIGAN, as Co-
Administrators of the Estate of TREVOR NORRIS CADIGAN,
Deceased,

Index No.: 152286/2018

Plaintiffs,

-against-

**NOTICE OF MOTION TO
DISMISS BY
DEFENDANTS
EUROTEC VERTICAL
FLIGHT SOLUTIONS,
LLC AND EUROTEC
CANADA, LTD
PURSUANT TO N.Y. CIV.
PRAC. L. & R. 3211(a)(8)**

LIBERTY HELICOPTERS, INC., a New York Corporation, NY
ON AIR LIMITED LIABILITY COMPANY, a New Jersey
Limited Liability Company, FLYNYON LLC, a Delaware
Limited Liability Company, MERIDIAN CONSULTING I
CORPORATION, INC., a Delaware Corporation, RICHARD
ZEMKE VANCE, a Connecticut resident; AIRBUS
HELICOPTERS, S.A.S., a French Corporation, AIRBUS
HELICOPTERS, INC., a Delaware Corporation; And APICAL
INDUSTRIES, INC. d/b/a DART AEROSPACE, a California
Corporation; EUROTEC VERTICAL FLIGHT SOLUTIONS,
LLC, a Kansas Corporation, and EUROTEC CANADA, LTD, a
Canada Limited Corporation,

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed Affirmation of Fred G. Wexler, dated
April 10, 2019, with the exhibits annexed thereto, the Affidavit of Chad Decker, sworn to on
April 9, 2019, the Affirmation of Hossein Golanbari, affirmed on April 9, 2019, the exhibits
annexed thereto, and the accompanying Memorandum of Law, and all prior pleadings and
proceedings herein, defendants EUROTEC VERTICAL FLIGHT SOLUTIONS, LLC and
EUROTEC CANADA, LTD, will move this Court at Room 130, at the Courthouse located at 60
Centre Street, New York, New York on May 16, 2019 at 9:30 o'clock in the forenoon, or as soon
thereafter as counsel may be heard, for an Order, pursuant to N.Y. Civ. Prac. L. & R. 3211
(a)(8), dismissing the Second Amended Complaint on the grounds that the court lacks personal

jurisdiction over said defendants and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, are to be served, pursuant to N.Y. Civ. Prac. L. & R. 2214(b), upon the undersigned no later than seven (7) days before the return date of this motion.

Dated: New York, New York
April 10, 2019

Respectfully Submitted,

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