

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

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

Plaintiffs, :

Index No. 152286/2018

-against-

NOTICE OF CROSS-MOTION

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; :
APICAL INDUSTRIES, INC. d/b/a DART :
AEROSPACE, a California Corporation; EUROTTEC :
VERTICAL FLIGHT SOLUTIONS, LLC, a Kansas :
Corporation; and EUROTTEC CANADA LTD., a Canada :
Limited Corporation, :

Defendants. :

----- X

PLEASE TAKE NOTICE that, upon the annexed Affirmation of Matthew F. Schwartz, and the exhibits submitted herewith, upon the accompanying Memorandum of Law, and upon all the prior pleadings and proceedings had herein, plaintiffs Jerry Cadigan and Nancy Caton Cadigan will cross-move this Court in the Motions Submission Part (Room 130) at the Courthouse located at 60 Centre Street, New York New York on July 15, 2019 at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order, pursuant to CPLR Rules 3124 and 3211(d), deferring a ruling on the motion by defendants EuroTec Vertical Flight Solutions, LLC and EuroTec Canada, Ltd. to dismiss the complaint for lack of jurisdiction and compelling defendants EuroTec Vertical Flight Solutions, LLC and EuroTec Canada, Ltd. to submit to

jurisdictional discovery, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR Rule 2214(b), answering affidavits, if any, are required to be served upon the undersigned at least seven (7) days prior to the return date of this cross-motion.

Dated: New York, New York
June 21, 2019

*Gary C. Robb, Esq.
*Anita Porte Robb, Esq.
ROBB & ROBB LLC
One Kansas City Place - Suite 3900
1200 Main Street
Kansas City, Missouri 64105
Telephone (816) 474-8080

*Thomas Stewart, Esq.
12307 Ballas Woods Court
St. Louis, Missouri 63131

*Admitted Pro Hac Vice

SCHWARTZ, PONTERIO & LEVENSON, PLLC



By: _____
Matthew F. Schwartz
134 West 29th Street – Suite 1006
New York, New York 10001
Telephone: (212) 714-1200

ATTORNEYS FOR PLAINTIFFS