

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

JERRY CADIGAN, and NANCY CATON  
CADIGAN, as the Proposed Administrators of the  
Estate of TREVOR NORRIS CADIGAN, deceased,

Plaintiffs,

-against-

LIBERTY HELICOPTERS, INC., a New York  
Corporation; NYONAIR, LLC, a New Jersey  
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;

Defendants.

INDEX NO.: 152286/2018

**NOTICE OF CROSS-MOTION  
TO COMPEL**

**MOTION BY:**

LIBERTY HELICOPTERS, INC., a New York  
Corporation; NYONAIR, LLC, a New Jersey  
Limited Liability Company; MERIDIAN  
CONSULTING I CORPORATION, INC., a  
Delaware Corporation; RICHARD ZEMKE  
VANCE,

**DATE, TIME & PLACE OF HEARING:**

September 21, 2018, at 9:30 a.m., in Room 130  
(Motion Submission Part) at 60 Center Stret,  
New York, New York

**SUPPORTING PAPERS:**

Affirmation of Gene K. Kaskiw, Esq., with  
Supporting Exhibits

**RELIEF DEMANDED:**

Order compelling response to Defendants’  
discovery demands

**GROUND FOR RELIEF:**

CPLR §3126 and all case law cited herein

**NATURE OF ACTION:**

Personal Injury

**REPLY PAPERS:**

Pursuant to the CPLR

**ORAL ARGUMENT:**

Requested, if Motion is Opposed

Dated: New York, New York  
September 10, 2018

Respectfully submitted,

**LEWIS BRISBOIS BISGAARD & SMITH, LLP**

By: /s/ Gene K. Kaskiw

**GENE K. KASKIW**

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