

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,

INDEX NO.: 152286/2018

Plaintiffs,

**NOTICE OF MOTION**

-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.

**PLEASE TAKE NOTICE**, that upon the annexed affirmation of Gene K. Kaskiw, Esq. dated August 16, 2018, together with the exhibits annexed thereto and upon all prior pleadings heretofore had herein, the undersigned will move this Court at the Motion Support Office Courtoom, Room 130, to be heard at the Courthouse located at 80 Center Street, Room 122, New York, New York 10013, on the 31<sup>st</sup> day of August, 2018 at 9:30 a.m. of that day or as soon thereafter as counsel may be heard for an Order, pursuant to CPLR §§ 3108, 3111 and 3113, granting an Open Commission and Letter Rogatory (Request for International Judicial Assistance) for Liberty Helicopters to serve a subpoena *duces tecum* upon the document custodian of a non-party entity with

principal place of business in the Country of Canada, Province of Ontario, or granting Defendants such other and further relief as to the Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that under CPLR § 2214(b), answering affidavits, if any, must be served upon the undersigned at least seven (7) days before the return date of this motion.

Yours, etc.,

New York, New York  
Dated: August 16, 2018

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Richard Zemke Vance*

By: /s/ Gene K. Kaskiw  
GENE K. KASKIW  
PETER B. VAN DEVENTER, JR. (*pro hac vice to be filed*)  
DOUGLAS H. AMSTER (*pro hac vice to be filed*)

**PLEASE DIRECT ALL  
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