

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK: HOUSING PART B

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THOMAS DUKLETH, ZACHARY HALL,
SHIRAS PATTERSON BECKWITH, JUDY
SABIN, AND REMIGIUSZ CHLAPEK
Petitioners,

Index No.: LT-307504-25/NY

-against-

109E9 LLC, MICHAEL GEYLIK, MGNY
CONSULTING CORP, YURI GEYLIK
Respondents,

Subject Premises:
109 East 9th Street
New York, NY 10003

-and-

NYC DEPARTMENT OF HOUSING
PRESERVATION & DEVELOPMENT and NYC
DEPARTMENT OF BUILDINGS,
City-Respondents.

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PLEASE TAKE NOTICE, that upon the annexed affirmation of Jennifer Akchin, the annexed Exhibits and memorandum, and all papers and proceedings to date, a motion will be made to this Court, Part B (Room 583) of the Courthouse located at 111 Centre Street, New York, 10013, on July 29, 2025, at 9:30 a.m. or as soon thereafter as counsel may be heard, for an Order:

- a) Pursuant to CPLR 3211 (b) striking Owner-Respondent’s defenses first, second, third, fourth, fifth, sixth, eighth, ninth and eleventh affirmative defenses
- b) Pursuant to CPLR § 408 and § 2120 and Civil Court Act 110 (c), Granting Petitioners leave for limited discovery, and deeming Petitioner’s annexed Notice of Inspection and Notice to Produce Documents served as of the date of the Court’s order.
- c) Such other and further relief as the Court deems just and proper.

Dated: July 11, 2025
Queens, NY



TAKEROOT JUSTICE

Attorneys for Petitioners

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TO:

Clerk of the Court, Housing Part B

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