

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
LOCAL 3621, EMS OFFICERS UNION, DC-37,;
AFSCME, AFL-CIO, Individually and on behalf of its:
members, RENAE MASCOL, and LUIS RODRIGUEZ,;
on behalf of themselves and on behalf of all other:
similarly-situated individuals, :

NOTICE OF MOTION

Plaintiffs, :

18-cv-4476 (LJL)(SLC)

-against- :

CITY OF NEW YORK; NEW YORK CITY FIRE
DEPARTMENT; DEPARTMENT OF CITYWIDE
ADMINISTRATIVE SERVICES; and John and Jane
Does ##1-20, the identity of such persons being
unknown to Plaintiffs but intended to describe those
persons responsible for the promotional policies of the
City of New York, :

Defendants. :

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PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law dated January 18, 2021, the Declaration in Support of Yetta G. Kurland and the exhibits attached thereto, the further Declarations in Support of Renae Mascol, Luis Rodriguez, Vincent Variale, Tonya Boyd, and Jason Saffon and upon all of the pleadings and proceedings heretofore had herein, Plaintiffs will move this court before U.S. District Judge Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan Courthouse, located at 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court for an Order, pursuant to FRCP §§ 23(a), 23(b) and 23(g), (1) certifying the classes defined herein pursuant to FRCP 23(b)(2) and FRCP 23(b)(3); (2) appointing

Representative Plaintiffs Renae Mascol and Luis Rodriguez as Class Representatives, and 3)
appointing The Kurland Group as Class Counsel.

Dated: New York, New York
January 18, 2021

THE KURLAND GROUP

~/s/~

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