

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

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KEVIN VENESKI and JUANITA VENESKI,

Plaintiffs,

- against -

**QUEENS-LONG ISLAND MEDICAL GROUP,
P.C. and LAWRENCE SOKOLSKY, M.D.,**

Defendants.

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NOTICE OF MOTION

Index No. 100011-1998

TTP 30

(Sherry Klein Heitler, J.)

S I R S :

PLEASE TAKE NOTICE that upon the annexed affirmation of NORMAN LEONARD COUSINS, duly affirmed the 27th day of January, 2006; together with the Exhibits annexed thereto in support thereof; and upon all the pleadings and prior proceedings had herein, the undersigned will move this Court at the Submission Part in Room 130 of the New York County Courthouse at 60 Centre Street, New York, New York on the 14th day of February, 2006 at 9:30 o'clock in the forenoon thereof or as soon thereafter as Counsel can be heard for an Order pursuant to Judiciary Law § 474-a (4) increasing the fee of plaintiff's counsel to one-third (33 1/3 %) of the net recovery in this action on the grounds that, due to extraordinary circumstances (to wit, the insolvency, dissolution and liquidation of defendants' primary insurance carrier, Group Council Mutual Insurance Company), the fee schedule set forth in Judiciary Law § 474-a (2) will not provide plaintiff's counsel with adequate compensation; together with such other and further relief as to this Court may seem just and proper.

**Dated: New York, New York
February 1, 2006**

Yours, etc.,

**/S/ NORMAN L. COUSINS
NORMAN LEONARD COUSINS
Attorney for Plaintiffs
299 Broadway - Suite 1600
New York, New York 10007
(212) 962-6460**

**To: MR. & MRS. KEVIN R. VENESKI
Plaintiffs
7000 Knighthood Lane
Columbia, MD 21045-4817**