

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

CANAL PRODUCTIONS, INC.,

PLAINTIFF,

-- against --

GRAHAM CHASE ROBINSON

DEFENDANT.

Index No. 654711/2019

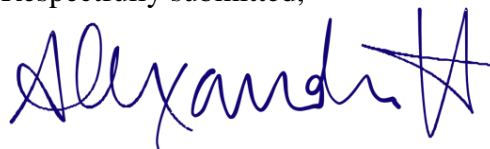
**NOTICE OF DEFENDANT'S MOTION TO STAY, MOTION TO DISMISS,
AND/OR MOTION TO STRIKE**

PLEASE TAKE NOTICE, that upon the accompanying Affidavit of Graham Chase Robinson, dated December 13, 2019, and the exhibits annexed thereto, the accompanying Memorandum of Law, and upon all pleadings and proceedings heretofore had herein, defendant Graham Chase Robinson will move this Court, at the Motion Submission Part Courtroom, Room 130, 60 Centre Street, New York, New York 10007, on January 9, 2020 at 9:30 am or as soon thereafter as counsel can be heard, for an Order: (A) staying the instant proceeding pursuant to CPLR 2201 until final judgment is entered in the proceeding in the Southern District of New York entitled *Graham Chase Robinson v. Robert De Niro and Canal Productions, Inc.*, Case No. 1:19-cv-09156, or in the alternative, dismissing the instant proceeding pursuant to CPLR 3211(a)(4) in favor of the proceeding in the Southern District of New York; (B) striking Paragraphs 1, 2, and 5 of Canal's Prayer for Relief and the section of Canal's Complaint entitled "Binging, Loafing, and Theft of Time" pursuant to CPLR 3024(b); (C) dismissing with prejudice the Fourth Cause of Action ("Fraud") in Canal's Complaint pursuant to CPLR 3211(a)(7) and 3016(b); and (D) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), answering papers, if any, are required to be served on the undersigned at least seven (7) days prior to the return date.

Dated: December 16, 2019

Respectfully submitted,

A handwritten signature in blue ink that reads "Alexandra" followed by a stylized star-like symbol.

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