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*Attorneys for Defendant Alan Rothstein*

FOX HILLS AT ROCKAWAY  
CONDOMINIUM ASSOCIATION, INC.

Plaintiff,

v.

BARBARA APPELBAUM, PAUL  
KARDOS, and ALAN ROTHSTEIN,

Defendants.

SUPERIOR COURT OF NEW JERSEY,  
CHANCERY DIVISION: MORRIS COUNTY

DOCKET NO.: MRS-C-130-17

Civil Action

**NOTICE OF MOTION  
FOR ATTORNEYS' FEES AND COSTS  
UNDER R. 1:4-8 AND N.J.S.A. 2A:15-59.1**

*Oral Argument Requested*

TO: Clerk, Morris County  
Superior Court of New Jersey  
Washington & Court Streets  
Morristown, New Jersey 07963

David J. Byrne, Esq.  
Ansell Grimm & Aaron, P.C.  
214 Carnegie Center, Suite 112  
Princeton, New Jersey 08540  
*Attorneys for Plaintiff*

Gary Wm. Moylen, Esq.  
90 Maple Avenue  
Morristown, New Jersey 08960  
*Attorneys for Defendant Paul Kardos*

The Honorable Robert J. Brennan, P.J. Ch.  
Superior Court of New Jersey  
Washington & Court Streets, 4<sup>th</sup> Floor  
Morristown, New Jersey 07963

Robyn Ann Valle, Esq.  
Robyn Ann Valle, P.C.  
12 Second Ave  
Denville, New Jersey 07834  
*Attorneys for Defendant Barbara Appelbaum*

**PLEASE TAKE NOTICE** that on Thursday, March 29, 2018 at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendant Alan B. Rothstein ("Rothstein") shall move before The Honorable Robert J. Brennan, P.J. Ch., Superior Court of New Jersey, Chancery Division, Morris County Courthouse, Washington & Court Streets, 4th Floor, Morristown, New Jersey, for

the entry of an Order granting Mr. Rothstein's motion for reasonable attorneys' fees and costs against the law firm of Ansell Grimm & Aaron, P.C. and plaintiff Fox Hills at Rockaway Condominium Association, Inc., pursuant to Rule 1:4-8 and N.J.S.A. 2A:15-59.1, respectively.

**PLEASE TAKE FURTHER NOTICE** that in support of the motion, Mr. Rothstein shall rely upon the Memorandum of Law, Certification of Michael A. Saffer, Esq., Certification of Alan B. Rothstein, Esq., and Certification of Robyn Valle, Esq., submitted herewith. A proposed form of Order is also included.

**PLEASE TAKE FURTHER NOTICE** that oral argument is respectfully requested.

**MANDELBAUM SALSBERG PC**  
*Attorneys for Defendant Alan Rothstein*

By: 

MICHAEL A. SAFFER

Dated: March 6, 2018

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