

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
AVRAHAM GOLDSTEIN; MICHAEL
GOLDSTEIN; FRIMETTE KASS-SHRAIBMAN;
MITCHELL LANGBERT; JEFFREY LAX; MARIA
PAGANO,
:

Plaintiffs,

vs.

Civil Action No. 1:22-cv-321

PROFESSIONAL STAFF CONGRESS/CUNY;
CITY UNIVERSITY OF NEW YORK; JOHN
WIRENIUS, in his official capacity as Chairperson
of the New York Public Employee Relations Board;
ROSEMARY A. TOWNLEY, in her official capacity
as Member of the New York Public Employee
Relations Board; CITY OF NEW YORK; THOMAS
P. DiNAPOLI, in his official capacity as New York
State Comptroller,
:

Defendants.
:
:
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DEFENDANT PROFESSIONAL STAFF CONGRESS/CUNY'S
MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that Defendant Professional Staff Congress/CUNY moves this Court to dismiss Counts I and II against it pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismiss Count III insofar as it seeks prospective relief pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, and grant such other and further relief as the Court deems just and proper.

In support of this motion, we submit a Memorandum of Law and the affidavit of Denyse Procope-Gregoire.

Dated: New York, New York
April 20, 2022

/s/ Scott A. Kronland

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