MICHAEL TENENBAUM, Esq. (No. 186850) 19958 Pacific Coast Highway Malibu, California 90265-5423 3 Tel. (310) 456-5952 Fax (603) 691-4798 MAR 1 4 2002 5 Counsel for Plaintiff and Petitioner Rocky Stefansky 6 7 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA 9 COUNTY OF LOS ANGELES 10 C-CUBED SOLUTIONS, INC., a Case no. BC255351 11 Delaware corporation, C-CUBED PRIVATE SOLUTIONS LIMITED, a 12 NOTICE OF MOTIONS AND MOTIONS business entity formed in India, and OF PETITIONER FOR RECONSIDER-13 ROCKY STEFANSKY, ATION OF RULING ON REQUEST TO VACATE ARBITRATION AWARD AND 14 Plaintiffs. FOR RENEWAL OF PETITION TO 15 V. **CONFIRM AWARD** 16 MARC HABERMAN aka MOSHE Date: April 22, 2002 HABERMAN, an individual, 17 Time: 9:00 a.m. 18 Hon. Helen Bendix Defendant. Dep't 18 19 ROCKY STEFANSKY, 20 Complaint filed: August 2, 2001 Trial date: (none set) 21 Petitioner. 22 V. 23 MARC HABERMAN aka MOSHE HABERMAN, an individual, C-CUBED 24 SOLUTIONS, INC., a Delaware 25 corporation, and C-CUBED PRIVATE SOLUTIONS LIMITED, a business 26 entity formed in India, 27 Respondents. 28

NOTICE OF MOTIONS AND MOTIONS OF PETITIONER FOR RECONSIDERATION OF RULING ON REQUEST TO VACATE ARBITRATION AWARD AND FOR RENEWAL OF PETITION TO CONFIRM AWARD

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 22, 2002, at 9:00 a.m., or as soon thereafter as counsel may be heard, in Department 18 of the Superior Court of the State of California, County of Los Angeles, located at 111 North Hill Street, Los Angeles, California, 90012, Petitioner Rocky Stefansky, through his counsel, will and hereby does move this Court (the "Motions") pursuant to Cal. Civ. Proc. Code § 1008 for reconsideration of its ruling on Respondents' request to vacate the arbitration award issued by the Beis Din Rabbinical Court of the Rabbinical Council of California on December 14, 2001 (the "Award"), and for renewal of his petition to confirm the Award.

The Motions are and will be based on Petitioner's accompanying brief in support of the Motions, the declarations of Michael Tenenbaum, Esq., Benjamin Kiss, Esq., Jacob Wurzburger, Rabbi Gershon Bess, Rabbi Avrohom Union, and Mark Bess, and the exhibits thereto, and such other matters as may be presented to the Court at or before a hearing on the Motions.

Dated: March 14, 2002

Respectfully submitted

MICHAEL TENENBAUM, Esq. 19958 Pacific Coast Highway

Malibu, California 90265-5423

Tel. (310) 456-5952

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Counsel for Plaintiff and Petitioner Rocky Stefansky

PROOF OF SERVICE

I, Michael Tenenbaum, declare as follows:

I am over the age of 18 and am not a party to this action. I am a resident of Los Angeles County. My address is 19958 Pacific Coast Highway, Malibu, CA, 90265. On March 14, 2002, I served copies of the following documents:

NOTICE OF MOTIONS AND MOTIONS OF PETITIONER FOR RECONSIDERATION OF RULING ON REQUEST TO VACATE ARBITRATION AWARD AND FOR RENEWAL OF PETITION TO CONFIRM AWARD; BRIEF IN SUPPORT THEREOF; DECLARATIONS OF MICHAEL TENENBAUM, BENJAMIN KISS, JACOB WURZBURGER, RABBI GERSHON BESS, RABBI AVROHOM UNION, AND MARK BESS IN SUPPORT THEREOF

on all other parties to this action by enclosing true copies of such documents in an envelope, addressed as follows:

Aviv L. Tuchman, Esq. Tuchman & Associates 3435 Wilshire Boulevard, 30th Floor Los Angeles, CA 90010

(Attorney for Respondents)

I placed such envelope, sealed and with postage thereon fully prepaid, in the mail of the United States Postal Service that same day in Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 14, 2002, at Los Angeles, California.

Michael Tenenbaum

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