

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

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Roy Den Hollander,

Plaintiff,

-against-

Tory Shepherd, Political Editor of The Advertiser-
Sunday Mail Messenger;
Advertiser Newspapers Pty Ltd., d/b/a The Advertiser-
Sunday Mail Messenger;
Amy McNeilage, Education Reporter for The Sydney
Morning Herald; and
Fairfax Media Publications Pty Ltd., d/b/a The Sydney
Morning Herald;

Defendants.

Index No. 152656/2014

**Oral Argument Requested
On Cross-Motion and
Defendants' Motion to
Dismiss**

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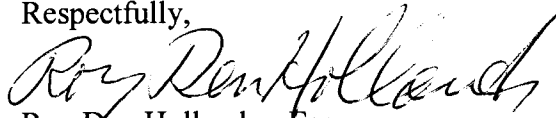
CROSS-MOTION REQUESTING DISCOVERY ON PERSONAL JURISDICTION

PLEASE TAKE NOTICE that upon the affidavit of Roy Den Hollander, sworn to on November 4, 2014, and upon the exhibits attached to the affidavit and all the pleadings and proceedings herein, the undersigned will move in the Supreme Court of the State of New York, located at 60 Centre Street, New York, in the Submissions Part, Room 130, on the 14th day of November, 2014, at 9:30 a.m., pursuant to CPLR 2215, for an order granting leave to Plaintiff to conduct disclosure on the issue of this Court's personal jurisdiction over the Defendants

Support for this request is in the Plaintiff's AFFIDAVIT IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO DISMISS at ¶¶ 22-52, 54, 56, 100, 103-105, 107, 115, 128, 131, 154-155, 160-163, 165.

Dated: November 6, 2014
New York, N.Y.

Respectfully,



Roy Den Hollander, Esq.
Petitioner and Attorney
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