

.....X

RECEIVED  
SPECIAL DELIVERY  
MAY 1 1962  
2012 APR 20 PM 3:24

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction, dated March 19, 2012, the Affirmation of Jillian Rennie Stillman, and the exhibits annexed thereto, and upon all pleadings previously filed herein, Plaintiffs will move in the Supreme Court of the State of New York, to be held in and for the County of Nassau, at the Courthouse thereof, located at 100 Supreme Court Drive, Mineola, New York 11501, on May 15, 2012, at 9:30 a.m. of that day, or as soon thereafter as counsel may be heard, for a preliminary injunction, pursuant to New York Civil Practice Law and Rules

(“C.P.L.R.”) §§ 6301 and 6311 enjoining Defendants Anthony Blackwell, United Legal Solutions, Inc. (a/k/a United Solutions Corporation), United Solutions Law Firm LLC, Consumer First Corporation, Consumer First Law Group LLC, and Blackwell’s Attorneys LLC from:

- a) Marketing, advertising, offering, selling or engaging in “Mortgage Loan Modification Services,” as that term is defined herein, or aiding and abetting the marketing, advertising, offering, selling, or carrying out of those services;
- b) Marketing, advertising, offering, selling or engaging in legal representation of consumers in connection with the performance of Mortgage Loan Modification Services;
- c) Being employed by (as in-house legal counsel or otherwise), or serving as a consultant to, any person or entity that sells or carries out Mortgage Loan Modification Services;
- d) Owning, managing, operating, creating, or assisting in the creation of any entity that markets, advertises, offers, sells, or carries out Mortgage Loan Modification Services;
- e) Engaging in any deceptive acts and practices or false advertising in violation of New York General Business Law §§ 349 or 350, including:
  - 1) Falsely promising to offer “legal representation” in connection with consumers’ loan modification applications;
  - 2) Misrepresenting to consumers the nature and mechanics of Mortgage Loan Modification Services;
  - 3) Falsely promising to engage in negotiations with consumers’ mortgage lenders or servicers;
  - 4) Misrepresenting the progress of loan modification applications;
  - 5) Falsely representing that consumers are certain to receive a reduction in mortgage interest rates and/or a reduction in mortgage principal;
  - 6) Falsely representing that refunds will be issued if the offered Mortgage Loan Modification Services do not lead to a successful result;
  - 7) Encouraging consumers to stop paying their monthly mortgage payments and/or to cease communications with their lenders or servicers;
  - 8) Charging consumers an upfront fee for Mortgage Loan Modification Services; and

- 9) Forming a business or organizational identity or operating as a “doing business as” organization as a method of evading dissatisfied customers.

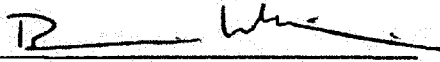
For purposes of Plaintiffs’ motion for a preliminary injunction, the term “Mortgage Loan Modification Services” shall mean any service, plan or program offered or provided to a consumer in exchange for consideration that is represented, expressly or by implication, as having the effect of assisting or attempting to assist the consumer with any of the following:

- a. Negotiating, obtaining, or arranging a modification of any term of a dwelling loan, including a reduction in the amount of interest, principal balance, monthly payments, or fees;
- b. Obtaining any forbearance or modification in the timing of payments from any dwelling loan holder or servicer on any dwelling loan;
- c. Negotiating, obtaining, or arranging any extension of the period of time within which the consumer may cure his or her default on a dwelling loan; or
- d. Obtaining any waiver of an acceleration clause or balloon payment contained in any promissory note or contract secured by any dwelling.

PLEASE TAKE FURTHER NOTICE that pursuant to C.P.L.R. § 2214(b), answering affidavits and memoranda of law, if any, must be served at least seven days before the return date of this motion.

Date: April 18, 2012  
New York, New York

**DAVIS POLK & WARDWELL LLP**

By:   
Brian S. Weinstein  
450 Lexington Avenue  
New York, NY 10017  
(212) 450-4000

Linda H. Mullenbach\*  
Meredith Horton  
*on behalf of*  
**Lawyers' Committee for Civil  
Rights Under Law**  
1401 New York Ave., NW Suite 400  
Washington, DC 20005  
(202) 662-8600

*Attorneys for Plaintiffs*

*\* Pro hac vice admission pending*

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

----- x  
Laura Squassoni, Frances Gagliostro, Scott  
Farley, Cynthia Tabares, Bert Tabares, Sophia  
Burke, Darlene Henson, Kathie Crete, David  
Crete, Judy Johns, Randall Johns, Bonnie  
Scarborough, James Hegler, Deborah Hegler,  
Lorraine Boardwine, Randy Boardwine,  
Michael Ellis, Tina Ellis, Phillip Stanford,  
Shakirah Stanford, Carolyn Campbell, Andrea  
Niedelman, Barry Niedelman, Levi Gales,  
Heather Risch and Randall Witt,  
Plaintiffs,

Index No. 3571/2012

- against -

**AFFIDAVIT OF SERVICE**

Anthony Blackwell, United Legal Solutions,  
Inc. (a/k/a United Solutions Corporation),  
United Solutions Law Firm LLC, Consumer  
First Corporation, Consumer First Law Group  
LLC, Blackwell's Attorneys LLC, Andre Day,  
Derrick Lafond, Jake Daloya, Kevin Quinn,  
Matthew Lapides, Vincent Villani, Jaime  
Enciso, Gabriel Katz, Jonathan Lyons, Akeem  
Hutchinson, Matthew Volpe, Aren Goldfaden,  
Jerzy Bialik, Ralphie Tarazi, and Michael Katz.

Defendants.

----- x  
)  
STATE OF NEW YORK

: ss

COUNTY OF NASSAU )

Diego Lopez, being duly sworn, deposes and says:

That I am over the age of 18 years, am not a party to this action, and am  
employed by Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York,  
New York 10017. On April 18, 2012, at approximately 4:00 p.m. I served an  
Order signed by Justice Galasso, dated April 18, 2012 rescheduling the hearing on  
plaintiffs' order to show cause to May 15, 2012 at 9:30 a.m. by Federal Express

by enclosing a true copy of each document in a post-paid envelope properly addressed, and placing in an official depository under the exclusive care and custody of Federal Express within the State of New York upon each of the defendants as listed below, through counsel as noted:

A Second Amended Notice of Motion for a Preliminary Injunction which adjourns the return date to May 15, 2012 by Federal Express by enclosing a true copy of each document in a post-paid envelope properly addressed, and placing in an official depository under the exclusive care and custody of Federal Express within the State of New York upon each of the defendants as listed below, through counsel as noted:

A Rider to a Temporary Restraining Order Bond by Federal Express by enclosing a true copy of each document in a post-paid envelope properly addressed, and placing in an official depository under the exclusive care and custody of Federal Express within the State of New York upon each of the defendants as listed below, through counsel as noted:

Anthony Blackwell  
125 East Broadway, Apt. 608  
Long Beach, NY 11561

Blackwell's Attorneys LLC  
c/o Anthony Blackwell  
125 East Broadway, Apt. 608  
Long Beach, NY 11561

Consumer First Law Group  
c/o Anthony Blackwell  
125 East Broadway, Apt. 608  
Long Beach, NY 11561

United Solutions Law Firm LLC  
c/o Anthony Blackwell

125 East Broadway, Apt. 608  
Long Beach, NY 11561

United Legal Solutions, Inc.  
3000 Hempstead Tpke. Suite 317  
Levittown, NY 11756

Consumer First Corporation  
3000 Hempstead Tpke. Suite 317  
Levittown, NY 11756

Consumer First Corporation  
1000 Woodbury Road Suite 107  
Woodbury, NY 11797

Eric Prusan, Esq.  
200 Old Country Road, Suite 680  
Mineola, NY 11501  
*Counsel for Defendant Aren Goldfaden*

Jerzy Bialik  
11 Muncey Road  
Bay Shore, NY 11706-5302

Vincent Villani  
334 Carnation Rd.  
West Islip, NY 11795

Matthew Lapidés  
1489 Park Ave  
Merrick, NY 11566-2233

Derrick Lafond  
223-24 Murdock Ave.  
Queens Village, NY 11429-2727

Jaime Enciso  
52 Lucille Ave.  
Elmont, NY 11003

Andre Day  
114 Village Ct.  
Warrenton, NC 27589

Jake Daloya

2064 Atlantic Blvd.  
Atlantic Beach, NY 11509

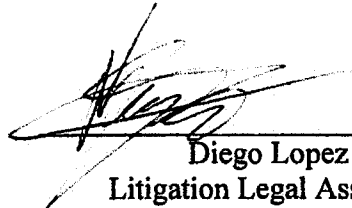
Gabriel Katz  
89 Laurel Park  
Northampton, MA 01060

On April 18, 2012, at approximately 4:00 p.m. I served an 1) Order signed by Justice Galasso, dated April 18, 2012 rescheduling the hearing on plaintiffs' order to show cause to May 15, 2012 at 9:30 a.m., a 2) Second Amended Notice of Motion for a Preliminary Injunction to the same day, May 15, 2012, a 3) Rider to a Temporary Restraining Order Bond by USPS 2<sup>nd</sup> Day Air by enclosing a true copy of each document in a post-paid envelope properly addressed, and placing in an official depository under the exclusive care and custody of USPS within the State of New York upon the defendant Jonathan Lyons at the following address:

Jonathan Lyons  
P.O. Box 164  
Jericho, NY 11753



Dated: New York, New York  
April 18, 2012

  
Diego Lopez  
Litigation Legal Assistant

Sworn to before me this  
20 day of April, 2012.

  
Notary Public

MICHAEL J. BROWN  
NOTARY PUBLIC, State of New York  
No. 01BR6247311  
Qualified in New York County  
Commission Expires Aug. 29, 2015

----- X  
Laura Squassoni, Frances Gagliostro, Scott  
Farley, Cynthia Tabares, Bert Tabares, Sophia  
Burke, Darlene Henson, Kathie Crete, David  
Crete, Judy Johns, Randall Johns, Bonnie  
Scarborough, James Hegler, Deborah Hegler,  
Lorraine Boardwine, Randy Boardwine,  
Michael Ellis, Tina Ellis, Phillip Stanford,  
Shakirah Stanford, Carolyn Campbell, Andrea  
Niedelman, Barry Niedelman, Levi Gales,  
Heather Risch and Randall Witt,

Plaintiffs,

- against -

Anthony Blackwell, United Legal Solutions,  
Inc. (a/k/a United Solutions Corporation),  
United Solutions Law Firm LLC, Consumer  
First Corporation, Consumer First Law Group  
LLC, Blackwell's Attorneys LLC, Andre Day,  
Derrick Lafond, Jake Daloya, Kevin Quinn,  
Matthew Lapidés, Vincent Villani, Jaime  
Enciso, Gabriel Katz, Jonathan Lyons, Akeem  
Hutchinson, Matthew Volpe, Aren Goldfaden,  
Jerzy Bialik, Ralphie Tarazi, and Michael Katz.

Defendants.  
----- X

Index No. 3571/2012

**SECOND AMENDED  
NOTICE OF MOTION  
FOR A PRELIMINARY  
INJUNCTION**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law in Support of  
Plaintiffs' Motion for a Preliminary Injunction, dated March 19, 2012, the Affirmation of Jillian  
Rennie Stillman, and the exhibits annexed thereto, and upon all pleadings previously filed herein,  
Plaintiffs will move in the Supreme Court of the State of New York, to be held in and for the  
County of Nassau, at the Courthouse thereof, located at 100 Supreme Court Drive, Mineola, New  
York 11501, on May 15, 2012, at 9:30 a.m. of that day, or as soon thereafter as counsel may be  
heard, for a preliminary injunction, pursuant to New York Civil Practice Law and Rules

R E C E I P T  
Printed:04-20-2012 @ 15:11:49  
NASSAU COUNTY  
MAUREEN O'CONNELL  
COUNTY CLERK

Trans#: 139131 Oper:FOS001  
DAVID POLK & WARDWELL LLP

Ref#: IN 12--003571  
Ctl#: 1565 Rec:4-20-2012 @ 3:11:39p

DOC	DESCRIPTION	TRANS AMT
	1 SQUASSONI, LAURA	
	2 BLACKWELL, ANTHONY	
	MOTION/CROSS-MOTION	
	Ste Fee-motion/cross	.00
*** Total charges:		.00