

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

JANE DOE,

Plaintiff,

-against-

CORNELL UNIVERSITY, INC., et al.

Defendants.

Index No. 161704/2026

Motion Seq. 003

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed affirmation of Thomas P. Giuffra, Esquire duly affirmed the 19th day of October, 2026, affirmation of W. Whitney Seals, Esquire duly affirmed the 19th day of October, 2026, and the exhibits annexed thereto, and upon all pleadings and proceedings heretofore had herein, Plaintiff JANE DOE will move this Court, by way of a motion in the Supreme Court, New York County, at the Courthouse located at 60 Centre Street, New York, NY 10007, in the Motion Submission Part, Room 130, on the 23rd day of November, 2026 at 9:30 in the forenoon of that day, or as soon thereafter as counsel can be heard, for an Order admitting W. Whitney Seals, Esquire *pro hac vice* in the above-captioned matter pursuant to 22 NYCRR 520.11. Plaintiff demands, pursuant to CPLR 2214(b), that Defendants serve any opposition or answering affidavits at least seven (7) days before the return date of November 23rd, 2026.

Dated: New York, NY
October 19, 2026

**RHEINGOLD GIUFFRA RUFFO
PLOTKIN & HELLMAN LLP**
Attorneys for Plaintiff



By: Thomas P. Giuffra, Esq.
551 Fifth Avenue, 29th Fl.
New York, NY 10176

Tel: (212) 684-1880
tgiuffra@rheingoldlaw.com
-AND-

COCHRUN & SEALS, LLC
Attorneys for Plaintiff
(Pro Hac Vice pending)

/s/ W. Whitney Seals

By: W. Whitney Seals, Esq.
P.O. Box 10448
Birmingham, AL 35202-0448
Tel: (202) 323-3900
whitney@cochruseals.com