

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VAGUELY QUALIFIED PRODUCTIONS
LLC,

Plaintiff,

v.

METROPOLITAN TRANSPORTATION
AUTHORITY (the "MTA"); THOMAS F.
PRENDERGAST, in his official capacity as
Chairman and Chief Executive Officer of the
MTA; and JEFFREY B. ROSEN, in his
official capacity as the Director of the MTA
Real Estate Department,

Defendants.

Case No. 1:15-cv-04952-CM (GWG)

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE that upon the annexed Declaration of Negin Farsad, dated August 10, 2015, and upon the separately bound Memorandum of Law and Declarations of Dean Obeidallah and Tanya Syed and accompanying exhibits, the undersigned, on behalf of Plaintiff Vaguely Qualified Productions, LLC ("Plaintiff"), hereby move this Court, before the Honorable Colleen McMahon, United States District Judge, in Courtroom 17C of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, for a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, ordering Defendants Metropolitan Transportation Authority, Thomas F. Prendergast, and Jeffrey B. Rosen (collectively, "Defendants") to display Plaintiff's advertisements in the subway system for a period of 28 days.

Dated: August 10, 2015
New York, New York

Respectfully submitted,
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