UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CASE NO. 03-4837 (DMC)

EX REL. DR. HELENE Z. HILL,

:

PLAINTIFF,

:

٧.

:

UNIVERSITY OF MEDICINE &
DENTISTRY OF NEW JERSEY,
DR. ROGER W. HOWELL and

DR. ANUPAM BISHAYEE,

NOTICE OF MOTION

DEFENDANTS. : FOR SUMMARY JUDGMENT

TO: JOHN P. LEONARD, ESQ. SCOTT B. FLYNN, ESQ.

McElroy, Deutsch, Mulvaney & Carpenter, LLP

1300 Mt. Kemble Avenue

P.O. Box 2075

Morristown, New Jersey 07962

SUSAN J. STEELE

Chief of the Civil Division United States Attorney's Office 970 Broad Street, Suite 700 Newark, NJ 07102

PLEASE TAKE NOTICE that pursuant to the Order entered by the Honorable Mark Falk, U.S.M.J. on April 15, 2010, the undersigned counsel for Plaintiff/Relator, Dr. Helene Z. Hill hereby moves before the United States District Court for the

District of New Jersey, for an Order granting the Plaintiff/ Relator Summary Judgment in this matter.

Plaintiff/Relator will rely upon the Statement of Uncontested Material Facts, the Certification(s)¹ and Brief herewith submitted in support of the Motion. A proposed form of Order is enclosed.

/Sheldon H. Pincus/ Sheldon H. Pincus Bucceri and Pincus, Esqs. 300 Broadacres Drive Bloomfield, NJ 07003-3153

Tel: (973) 771-0700 Fax: (973) 771-0707

Email: shpincus@verizon.net

Counsel to Plaintiff Dr. Helene Z. Hill

Dated:

¹In accordance with the permission and directive of the chambers of the Honorable Dennis M. Cavenaugh, U,S.D.J., all exhibits that have been cited to in support of this motion and that are identified in the moving papers have been separately placed on recordable discs and copies thereof filed with the Court, the Clerk and to all counsel of record.