

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

RAYMOND E. BUTLER, II,

Plaintiff,

v.

ELI JACKFINN EDDI a/k/a ELY EDDI,  
et al.,

Defendants.

Case No. 2:24-cv-00134

Hon. Paul L. Maloney

Mag. Judge Maarten Vermaat

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**Defendants Chaim Rajchenbach and Menachem Shabat's Response Brief  
in Opposition to Plaintiff's Objection to ECF 101**

**I. Introduction.**

Judge Vermaat was within his discretion when he decided that the stay should remain in place. Plaintiff's Illinois case is mere months away from trial. If the factfinder in that case finds that plaintiff is not a trust beneficiary or that he released his claims, then plaintiff's claims in this case will be barred by collateral estoppel. Lifting the stay before then could waste resources of the Court and the over 30 defendants named in the complaint. The magistrate decided that efficiency interests support a continued stay through the conclusion of trial in the Illinois case. That was appropriate.

It also was not clearly erroneous or contrary to law for the magistrate to order plaintiff to refrain from directly contacting individuals involved in this litigation. Defendants presented evidence of plaintiff's harassment and threats, which plaintiff did not deny. Plaintiff's arguments why he shouldn't be limited to

communicating through his attorney are meritless. Because plaintiff and his counsel have unreasonably and vexatiously multiplied these proceedings, sanctions are warranted.

**II. Are Judge Vermaat’s decisions clearly erroneous or contrary to law?**

Plaintiff’s objection does not include the applicable standard of review. The district judge should only reverse a magistrate’s opinion on a non-dispositive matter where the opinion was clearly erroneous or contrary to law. *Haworth, Inc. v. Herman Miller, Inc.*, 162 F.R.D. 289, 291 (W.D. Mich. 1995), citing *Brown v. Wesley’s Quaker Maid, Inc.*, 771 F.2d 952 (6th Cir. 1985); Fed. R. Civ. P. 72(a). An order is clearly erroneous when the reviewing court “is left with the definite and firm conviction that a mistake has been committed.” *U.S. v. Mabry*, 518 F.3d 442, 449 (6th Cir. 2008), quoting *U.S. v. U.S. Gypsum Co.*, 333 U.S. 364, 395 (1948). This standard does not allow a district judge to reverse a magistrate’s finding just because the district judge would have decided the matter differently. *Sedgwick Ins. V. F.A.B.E. Custom Downstream Sys., Inc.*, 47 F. Supp. 3d 536, 538 (E.D. Mich. 2014). The “clearly erroneous” standard applies to the magistrate’s factual findings, while his legal conclusions are reviewed under the “contrary to law” standard. *Haworth*, 162 F.R.D at 291, citation omitted. Where the applicable legal standard requires the decisionmaker to conduct a balancing test, such as the issue here of whether to enter a stay, the magistrate’s decision should be reversed only on a showing of an abuse of discretion. *See id.*, citation omitted.

**III. Judge Vermaat did not abuse his discretion when he denied plaintiff’s renewed motion to lift stay.**

**A. “Plaintiff is ultimately responsible for this delay as he initiated both actions. Defendants’ interests and the public’s interest in saving court resources continue to favor the stay.” ECF No. 87 at PageID.991.**

This Court summarized the background in its order granting defendants’ motion to stay:

On August 6, 2024, Plaintiff filed his 72-page complaint against 31 Defendants alleging a RICO conspiracy regarding the administration of a trust. (ECF No. 1). On September 9, 2024, Defendants Chaim Rajchenbach and Menachem Shabat moved to stay this action. (ECF No. 37). On September 11, 2024, Defendant Ilana Finn Eddi joined her codefendants’ motion to stay. (ECF No. 56)....

Back in January 2022, Mr. Butler, the same Plaintiff in this case, sued Ilana Eddi and Ely Eddi in Cook County’s Probate Court over the same trust at issue here. *Raymond Butler & Hannah Finn v. Ilanna Eddi & Ely Eddi*, No. 22 CH 675 (Ill. Cir. Ct. Jan. 26, 2022). In October 2022, Plaintiff filed his first amended complaint in the Illinois case, which alleged that he is a trust beneficiary. (ECF No. 37-5). Plaintiff also demanded an accounting from Ms. Eddi and Mr. Eddi. (*Id.*). Currently, there is a pending motion for summary judgment in the Illinois case. (ECF No. 37-2). At issue in the Illinois court case is whether Plaintiff is a beneficiary of the trust and if he was a beneficiary, whether he waived his rights to the trust in exchange for \$30,000. (*Id.*). Defendants moved to stay this action because, in their view, collateral estoppel could bar Plaintiff’s federal case in its entirety.... [ECF No. 79 at PageID.772-73].

On September 26, 2024, this Court stayed the case. ECF No. 79. On November 5, 2024, Plaintiff filed a motion asking the Court to lift the stay because the Illinois court had delayed hearing the Eddis’ summary judgment motion. ECF No. 85. This Court denied the motion:

The delays in state court are unfortunate. But those delays do not change this court’s prior analysis regarding the necessity of a stay. (ECF No. 79 at PageID.777-80). Plaintiff is ultimately responsible for this delay as he initiated both actions. Defendants’ interests and the

public's interest in saving court resources continue to favor the stay. [ECF No. 87 at PageID.991].

Plaintiff's objection claims that defendants are seeking an "indefinite" stay. Not so. The Cook County judge recently denied Ms. Eddi and Mr. Eddi's motion for summary judgment and set the matter for trial on November 3, 2025. *See* ECF No. 97. That means it is just months before the parties in that case obtain a judgment that could be dispositive of the claims against the 31 defendants in this case. That is good reason for the stay to continue until that time, like Judge Vermaat decided.

**B. The relevant factors support Judge Vermaat's decision to continue the stay.**

District courts have broad discretion to stay proceedings "until preliminary questions which may dispose of the case are answered." *Bangas v. Potter*, 145 F.App'x 139, 141 (6th Cir. 2005), citing *Hahn v. Star Bank*, 190 F.3d 708, 719 (6th Cir. 1999). Where a stay motion is premised on the significance of another case's disposition, courts conduct a balancing test of factors including the potential dispositive effect of the other case, judicial economy achieved by awaiting adjudication of the other case, the public welfare, and the relative hardships to the parties created by withholding judgment." *Caspar v. Snyder*, 77 F.Supp.3d 616, 644 (E.D. Mich. 2015). Plaintiff's objection cites to the Supreme Court's decision in *Moses H. Cone Mem'l Hosp. v. Mercury Constr. Corp.*, 460 U.S. 1 (1983), which includes additional factors to consider when staying a federal case in favor of a state case. Those factors are: (1) which court first assumed jurisdiction over the property; (2) the inconvenience of the federal forum; (3) the desirability of avoiding piecemeal

litigation; (4) whether federal law predominates; and (5) the order in which jurisdiction was obtained by the concurrent forums. *Id.* at 15, 23. The factors support continuing the stay in this case, as follows.

This Court previously explained its reasoning for granting defendants' motion to stay:

[C]ollateral estoppel could bar some of Plaintiff's claims, and the Illinois case's disposition is imminent. If the Illinois court determines that Plaintiff is not a trust beneficiary or waived his rights to the trust at issue, his claims are likely to fail in this federal case. As acknowledged by the Eleventh Circuit, a "likelihood that the other forums' decisions would control or significantly inform the litigation" continues a "good reason" for a stay. *Miccosukee Tribe of Indians of Fla. v. S. Fla. Water Mgmt. Dist.*, 559 F.3d 1191, 1197 (11th Cir. 2009). [ECF No. 79 at PageID.778].

The Court identified the elements needed to establish collateral estoppel and explained how they all favor a stay in this case. *Id.* at PageID.778-79. The only thing that has changed since entry of the stay is that the Illinois court has denied Ms. Eddi and Mr. Eddi's motion for summary judgment and set the case for trial beginning on November 3, 2025. That means the parties will have to wait some months longer to get a judgment that could be dispositive of this federal case. But that additional delay does not justify lifting the stay. As the Court previously wrote, and it still remains true:

[S]everal reasons lead the court to believe that a stay is proper here. Plaintiff brought both cases. He is responsible for the timing and venue of each.... The Illinois case has been pending since January 2022. And finally, this court runs the risk of issuing a ruling which would be adverse to a state court judgment. Principles of comity and federalism caution against such friction. [ECF No. 79 at PageID.780].

The public interest in judicial economy and efficiency also will be advanced by a stay of these proceedings, because a stay will free up judicial resources. That, in addition to the potential savings to the dozens of parties from unnecessary litigation expenses, outweighs any hardship on plaintiff, who “is responsible for the timing and venue” of his two cases. *Id.*

The same goes for the *Moses H. Cone* factors. The first factor is not applicable, because there was no assumption by a court over any property. As for the second factor, this Court already ruled that Michigan is not the proper venue for this action, where the complaint does not identify any fact that occurred in Michigan, and the vast majority if not all of the defendants are not domiciled in Michigan. *See* ECF No. 60. The third factor also favors a stay, so that the parties are not forced to litigate parallel cases in two separate forums at the same time. As for the fourth factor, federal law does not predominate—17 of the 19 counts in plaintiff’s complaint are state-law claims. And the fifth factor also favors a stay, because, as this Court previously noted: “Plaintiff is ultimately responsible for this delay as he initiated both actions.” ECF No. 87 at PageID.991. The Illinois case has been pending since January 2022, while in this case, filed two and a half years later, there are many defendants who have not yet even filed responsive pleadings. *See* ECF No. 79 at PageID.780. All of the relevant factors support continuing the stay.

The magistrate did not abuse his discretion when he decided to keep the stay in place.

**IV. It was not clearly erroneous or contrary to law for Judge Vermaat to order plaintiff's communications to be through his attorney.**

**A. "Plaintiff's conduct—allegedly harassing defendants and third parties—is inappropriate." ECF No. 104 at PageID.1125.**

The CEO of UnitedHealthcare Brian Thompson had just been murdered, with the murderer disturbingly becoming a folk hero. That is when plaintiff promised to "dismantle" defendants' "Empire of Death" and that "collateral damage... may occur" before he may claim "what is rightfully" his. *See* ECF No. 88-3. These frightening threats and other harassment, in addition to plaintiff ignoring the stay in this case by pretending to be the beneficiary of defendants' family trusts in an effort to obtain improper discovery, warranted a protective order.

On September 9, 2024, plaintiff contacted Canadian Imperial Bank of Commerce ("CIBC"), demanding that the bank freeze defendants' family trust accounts and remove the trustees. Plaintiff then called CIBC more than 10 times in a span of two days and threatened bank employees. *See* ECF No. 88-5. Plaintiff's counsel also sent emails to CIBC on September 9 and 10, 2024, referencing plaintiff's alleged trusts. ECF No. 88-6; *see also* ECF No. 88-5.

On September 10, 2024, the undersigned counsel sent a cease and desist letter to plaintiff's counsel. ECF No. 88-7. Instead of halting what was effectively her client's attempted bank fraud, plaintiff's counsel sent CIBC a letter dated September 11, 2024, alleging that her client was the beneficiary of defendants' family trusts and demanding related documentation. ECF No. 88-8. Plaintiff's counsel emailed a copy of her September 11, 2024 letter to 19 CIBC employees,

including the CEO and other executive committee members. *See id.* On September 13, 2024, counsel for CIBC sent a cease and desist request to plaintiff's counsel. ECF No. 88-5.

This case was stayed on September 26, 2024. *See* ECF No. 79. On October 7, 2024, Plaintiff filed a motion entitled "motion for limited scope discovery," in which he claimed again that he was the beneficiary of defendants' family trusts and sought leave to serve a subpoena for documents on CIBC. ECF No. 82. This Court denied the motion. ECF No. 84. Plaintiff did not pause his harassment for long.

In late December 2024, plaintiff sent text messages to Mr. Shabat's cell phone, accusing him of "trust fraud and embezzlement" and threatening to "take everything back to down to every last penny." ECF No. 88-4. The undersigned counsel sent another cease and desist request to plaintiff's counsel. ECF No. 88-9. Plaintiff's conduct only become more alarming.

On December 30, 2024, Plaintiff and an unnamed individual visited a CIBC branch again inquiring about defendants' accounts. *See* ECF No. 88-2. After being turned away, plaintiff called the branch later that day, telling the bank employee with whom he spoke that he would have to "kick in a door" to get someone to listen to his demands. *See id.* As a result of the harassment and threats, CIBC banned plaintiff from entering any of its premises and reiterated its demand that plaintiff cease and desist from any direct communications with CIBC or its employees. *See id.* It also reported plaintiff to local and federal law enforcement.

On January 2, 2024, plaintiff sent an email to CIBC's directors and officers and others. ECF No. 88-3. The email was disturbing. Plaintiff asserted that CIBC's general counsel "is complicit with fraud being perpetuated by the Co-Trustees of the GPN Family Trust and DOROS Generation Trust. These are my family's trusts. She may also be an accessory to the crimes..." *See id.* Plaintiff continued that the general counsel "has attempted to intimidate, threaten and silence me in a twisted plot to cover up criminal conduct." *See id.* "Federal regulators and agencies in both the US and Canada have been informed of this egregious conduct." *See id.* "Letters detailing these crimes with evidence have also been sent to Congressional Representatives of multiple districts, President-Elect Donald J. Trump, and other relevant cabinet nominees such as Pam Bondi, Kash Patel, et cetera..." *See id.*

Plaintiff's letter concluded chillingly: "So must come more grief before peace can be obtained. I do not relish the outcome of such disruption, or the collateral damage that may occur, but I will not be deterred from claiming what is rightfully mine." *See id.* "These trusts have been used to purchase a vast portfolio of nursing homes.... The residents are left in deplorable conditions, to die an early death, all for the profiteering of a few unscrupulous individuals. I intend to dismantle this Empire of Death." *See id.*

CIBC forwarded plaintiff's letter to the undersigned counsel. Alarmed, in-house counsel for defendants forwarded plaintiff's counsel a copy of plaintiff's letter, writing that "I think you can see this escalating in a bad direction and for the sake of everyone involved, this has to stop. You, me and Jesse [the undersigned counsel]

need to get on a call – today if possible – to discuss. Please let me know when you’re available.” ECF No. 88-10. Instead of a response from plaintiff’s counsel, plaintiff apparently was forwarded a copy of the email and responded directly to in-house counsel for defendants, copying defendants and a number of their business associates on the email. ECF No. 88-11. Plaintiff stated that: he had filed a frivolous ethics complaint against in-house counsel for defendants; he would continue to directly harass defendants and their family members; he is the beneficiary of defendants’ family trusts; and he had filed complaints with a half dozen agencies. *See id.* Plaintiff also stated that he had instructed his lawyer not to respond to any further communications from counsel for defendants. *See id.* As promised by plaintiff, his counsel did not respond to defense counsel’s email requesting a phone call to deescalate the situation.

On January 6, 2025, Plaintiff called in-house counsel for defendants on his cell phone and office line and sent a text message saying: “What’s the matter? Don’t want to talk to me? Stop trying to play games and spread lies. You won’t win.” ECF No. 88-12. Plaintiff then sent a text message to Mr. Shabat, which, in addition to other harassing comments, stated that “I could start asking Ahuva [Shabat, Mr. Shabat’s wife] for the trust agreements if you would prefer.” ECF No. 90-1. The implication was that plaintiff would begin harassing Mr. Shabat’s wife if Mr. Shabat did not cooperate with plaintiff’s demands. Plaintiff also stated that defendants’ in-house counsel “doesn’t have the balls to talk to me directly.” *See id.*

On January 9, 2025, after Mr. Shabat rejected a nonsensical settlement demand from plaintiff's counsel, plaintiff texted Mr. Shabat: "I won't be extending another olive branch.... Make a good decision and worry about you and your family, not [Mr. Rajchenbach]," another threat against Mr. Shabat and his family. ECF No. 90-2. On January 21, 2025, plaintiff sent an email to in-house counsel for defendants with a copy to their business associates. ECF No. 95-1. The emails warned in-house counsel to "mind your own business, before you really become part of mine." *See id.* Plaintiff signed the email: "At your own risk, Raymond Butler." *See id.* Defendants' in-house counsel reported plaintiff to the Federal Bureau of Investigations ("FBI"), which on information and belief has jurisdiction because of plaintiff's attempted bank fraud and his threatening electronic communications, and the FBI is in the process of investigating.

**B. Plaintiff cannot show that the protective order is clearly erroneous or contrary to law.**

"A party or any person from whom discovery is sought may move for a protective order in the court where the action is pending... to protect a party or person from annoyance, embarrassment, oppression, or undue burden...." Fed. R. Civ. P. 26(c)(1). The district court may enter an order forbidding the discovery. Fed. R. Civ. P. 26(c)(1)(A). If a motion for protective order is granted, the district court "must" require the party whose conduct necessitated the motion, the party or attorney advising that conduct, or both to pay the movant's reasonable fees. Fed. R. Civ. P. 26(c)(3); Fed. R. Civ. P. 37(a)(5).

District courts are vested with powers enabling them “to manage their own affairs so as to achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991). “The federal courts’ inherent power to protect the orderly administration of justice and to maintain the authority and dignity of the court extends to a full range of litigation abuses.” *Mitan v. Int’l Fidelity Ins. Co.*, 23 Fed. Appx. 292, 298 (6th Cir. 2001), citations omitted. District “courts need the discretion to craft sanctions because the power to sanction is essential for them to manage heavy case loads and to protect the interests of litigants.” *First Bank of Marietta v. Hartford Underwriters Ins. Co.*, 307 F.3d 501, 516 (6th Cir. 2002), citation and internal quotation marks omitted. “A court may use this inherent power to sanction a party who has acted in bad faith, vexatiously, wantonly, or for oppressive reasons.” *Mitan*, 23 Fed. Appx. at 298, citation and internal quotation marks omitted.

Plaintiff argues that he has a First Amendment right to harass and threaten defendants and that the protective order is an unconstitutional prior restraint. But that’s wrong—none of the authorities in his objection say that a litigant has a constitutional right to harass and threaten opposing parties. In *Carroll v. Pres. and Com’rs of Princess Anne*, 393 U.S. 175, 181 (1968), the Supreme Court held that it was improper to issue an *ex parte* restraining order without notice to the petitioners. Plaintiff here had notice and an opportunity to respond. In *Proctor & Gamble Co. v. Bankers Tr. Co.*, 78 F.3d 219, 225 (6th Cir. 1996), the issue was a prior restraint “prohibiting the publication of a news story... [which] is the essence

of censorship.” Not so here, where plaintiff was merely prohibited from communicating directly with individuals whom he has been harassing. In *Madsen v. Women’s Health Center, Inc.*, 512 U.S. 753, 765 (1994), the Supreme Court stated that the injunction in that case must be “no more burdensome to the defendant than necessary to provide complete relief to the plaintiffs.” Here, the prohibition on plaintiff’s communications provides complete relief to the people in this litigation whom he has been harassing and is no more burdensome than necessary. In *Gulf Oil Co. v. Bernard*, 452 U.S. 89 (1981), the Supreme Court dealt with orders imposing conditions on the representative parties in a class action under FRCP 23. That analysis does not apply here.

One case that plaintiff does not cite is *Polaris Amphitheater Concerts, Inc. v. City of Westerville*, 267 F.3d 503 (6th Cir. 2001). The Sixth Circuit explained that “the chief concern which animates the doctrine of prior restraint—the fear of censorship and thought control—is not raised by... [a] content-neutral regulation,” unless it “permit[s] unfettered official discretion” as to what content is allowed and what content is prohibited. *Id.* at 509. Here, the protective order is content neutral. It prohibits plaintiff from contacting defendants or any witness in this case unless that contact is through his attorney. *See* ECF No. 101. It is not an attempt at censorship or thought control. It does not give the Court unfettered discretion to allow certain content and disallow other content. And it is necessary and working—the harassment and threats have eased since the February 12, 2025 protective order was entered. Nor is it more burdensome than necessary. If plaintiff wishes to

communicate with any witness in this case, he may do so through his attorney. The only thing it burdens is plaintiff's ability to send messages to defendants that his counsel is not comfortable forwarding. That is not an unconstitutional prior restraint.

Overall, plaintiff's claims against Mr. Rajchenbach and Mr. Shabat are built on the assumption that plaintiff is a beneficiary of a trust relative to which his biological grandfather was the settlor and, because of the purchase of a nursing home by Mr. Rajchenbach and Mr. Shabat, plaintiff somehow also is now the beneficiary of their personal family trusts. The claims are frivolous, but that is an issue for another day. The reason for the protective order was because of plaintiff's harassment, threats, and attempts to violate the stay in this case, culminating in his email to CIBC's directors and officers accusing CIBC's general counsel of being complicit in fraud and engaging in a "twisted plot" to cover up criminal conduct, claiming that he has notified President Trump and other members of government, threatening that "so must come more grief before peace can be obtained. I do not relish the outcome of such disruption, or the collateral damage that may occur, but I will not be deterred from claiming what is rightfully mine," and referring to Mr. Rajchenbach and Mr. Shabat's business as an "Empire of Death" that he intends to dismantle. *See* ECF No. 88-3. Plaintiff also sent threatening text messages to Mr. Shabat and began threatening defense counsel. *See* ECF No. 88-4 and 88-11.

Plaintiff's erratic and threatening behavior made defendants and their families feel unsafe. Plaintiff's objection complains about the protective order

restricting him while imposing no restrictions on defendants. But that is because plaintiff is the only one who has been harassing people. Plaintiff also complains that the protective order interferes with his ability to investigate his case. It doesn't. This Court correctly stated that "Plaintiff is not at risk of missing any pending discovery deadlines, even if this court were to ignore his inflammatory investigation style. And Plaintiff has an attorney to speak to other litigants and witnesses on his behalf." *See* ECF No. 104 at PageID.1125. Plaintiff also argues that he is a trust beneficiary and that defendants therefore have a fiduciary duty to respond to his inquiries. But Plaintiff's say so is not enough. Defendants deny owing any duty to plaintiff, and unless and until there is such a ruling in this case, it is silly to suggest that plaintiff has a right to harass and threaten them in the guise of some imagined duty owed. Plaintiff is grasping at straws. He fails to provide any legal or factual basis to undo the protective order.

Judge Vermaat's finding that plaintiff engaged in inappropriate conduct was not clearly erroneous, and Judge Vermaat's order requiring all communications to be through plaintiff's counsel was not contrary to law.

#### **V. Sanctions are warranted against plaintiff and his counsel.**

Section 1927 provides that an attorney "who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct." 28 U.S.C. § 1927. The inherent authority of the Court is an independent basis for sanctioning bad-faith conduct by litigants. *First Bank of*

*Marietta*, 307 F.3d at 511, citation omitted. The district court has the “inherent authority to award fees when a party litigates in bad faith, vexatiously, wantonly, or for oppressive reasons.” *Big Yank Corp. v. Liberty Mut. Fire Ins. Co.*, 125 F.3d 308, 313 (6th Cir. 1997), citation and internal quotation marks omitted.

Here, plaintiff filed an emergency motion to stay the magistrate’s order that was made necessary by plaintiff and his counsel’s own inappropriate conduct. ECF No. 102. This Court denied plaintiff’s motion, calling it “frivolous” because plaintiff’s “assertions [were] without citation to any authority.” ECF No. 104 at PageID.1125. Plaintiff’s objection – which omits the standard of review and includes underdeveloped assertions that are still unsupported or under-supported by citation to apposite authority – similarly lacks a good-faith basis. Yet plaintiff filed it with knowledge that the Court would hold an in-person hearing and require plaintiff “to testify regarding his apparent First Amendment issue.” *See id.* at PageID.1126. And defendants have been forced to draft several filings and prepare for an evidentiary hearing, all because of plaintiff and his counsel’s inappropriate conduct and meritless legal positions.

Plaintiff and his counsel have unreasonably and vexatiously multiplied the proceedings in this case. They should be required—counsel under Section 1927 and plaintiff pursuant to the inherent authority of this Court—to pay the defense costs incurred because of their conduct.

## **VI. Conclusion.**

For these reasons, Mr. Rajchenbach and Mr. Shabat request that this Court

deny plaintiff's objection to ECF 101 and require plaintiff and his counsel to pay defendants' reasonable costs, expenses, and attorney fees.

Respectfully submitted,  
MADDIN, HAUSER, ROTH & HELLER, P.C.

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Dated: March 11, 2025

**CERTIFICATE OF COMPLIANCE**

Defendants Chaim Rajchenbach and Menachem Shabat, through their counsel, state that the relevant portion of their Response Brief in Opposition to Plaintiff's Objections is a total of 4,398 words.

/s/ Jesse L. Roth  
Jesse L. Roth (P78814)  
Maddin Hauser Roth & Heller, PC

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2025, the foregoing document was electronically filed with the Clerk of Court using the Court's electronic filing system, which will send notification of such filing to all counsel of record.

/s/ Jesse L. Roth  
Jesse L. Roth (P78814)  
Maddin Hauser Roth & Heller, P.C.