

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

_____	)
RACHEL POUYAFAR,	)
	)
Plaintiff,	)
	)
-against-	)
	)
JOHN DOE NOS. 1-25,	)
	)
Defendants.	)
_____	)

Index No. 654820/2023

**AFFIRMATION  
OF RISHI BHANDARI**

I, Rishi Bhandari, an attorney admitted to practice before the courts of the State of New York, and not a party to this action, hereby affirm the following to be true under the penalties of perjury:

1. I am an attorney with the law firm Mandel Bhandari LLP, attorneys for Plaintiff Rachel Pouyafar (“Plaintiff”) in the above-caption action. I am familiar with the subjects of this Affirmation.

2. I hereby affirm that pursuant to CPLR 2217(b) that Plaintiff has not previously sought the relief sought by this motion and there have been no prior motions in this matter.

3. I hereby affirm that pursuant to Uniform Rule 202.7(f) (22 N.Y.C.R.R. § 202-7(f)) giving notice to Defendants of the application here for a preliminary injunction and temporary restraining order would result in significant prejudice to Plaintiff. As described more fully in these papers, including the Complaint and accompanying affirmation of Charles Zach, absent the immediate injunctive relief sought here, there will be nothing to prevent Defendants from transferring or otherwise dissipating Plaintiff’s assets, in violation of New York law and causing

her irreparable harm. This prejudice is why Plaintiff seeks a temporary restraining order pending a hearing on the request for a preliminary injunction.

4. I hereby affirm pursuant to Uniform Rule of the Chief Administrator 130-1.1-a (22 N.Y.C.R.R. § 130-1.1, 130-1.1a) that, to the best of my knowledge, information and belief, formed after a reasonable inquiry under the circumstances, the following papers listed below or the contentions therein are not frivolous as defined in 22 N.Y.C.R.R. § 130-1.1(c):

- a. Complaint;
- b. Request for Judicial Intervention;
- c. Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction;
- d. Affidavit of Rachel Pouyafar in Support of Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction;
- e. Affirmation of Charles Zach in Support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction;
- f. Proposed Order to Show Cause and Temporary Restraining Order;

5. Pursuant to CPLR 2217(b), Plaintiff has not previously sought the relief sought by this motion brought by order to show cause, and there have been no prior motions or proceedings in this matter.

Dated: New York, New York  
September 29, 2023

By:   
Rishi Bhandari, Esq.

Rishi Bhandari, Esq.  
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**Certification Pursuant to 22 NYCRR § 202.8-b**

I, Rishi Bhandari, at attorney duly admitted to practice law before the courts of the State of New York, hereby certifies that this Memorandum of Law contains 361 words, excluding the parts exempted by § 202.8-b(b), and therefore complies with the word count limit set forth in 22 NYCRR § 202.8-b(a).

Dated: New York, New York  
September 29, 2023

By:   
Rishi Bhandari, Esq.