

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

**IN RE 650 FIFTH AVENUE  
AND RELATED PROPERTIES**

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) Case No.: 1:08-CV-10934-KBF  
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**NOTICE OF MOTION AND MOTION TO INTERVENE**

PLEASE TAKE NOTICE that, on a date and at such time as may be designated by the Honorable Katherine B. Forrest, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Intervenors John Relvas, John Kees, and Mark Boyd, individually and on behalf of a class pursuant to Rule 23 that includes all persons with an interest in the limited fund as a result of a claim arising from terrorist attacks sponsored by the Islamic Republic of Iran, will, and hereby do move the Court for an Order granting their motion to intervene pursuant to Fed. R. Civ. P. 24, and for such other and further relief as this Court deems proper.

March 11, 2015

Respectfully submitted,

BY: /s/ Douglas J. McNamara

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*Attorneys for Proposed Intervenors Relvas, Kees  
& Boyd & Proposed Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2015, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which in turn sent notice to all counsel of record who are registered with that system.

/s/ Douglas J. McNamara

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**(PROPOSED) ORDER**

Upon consideration of the Relvas' Intervenors' Motion to Intervene, and for good cause shown, it is hereby ORDERED that Plaintiffs' Motion is GRANTED, and the Clerk of Court is directed to file Plaintiffs' Class Action Complaint in Intervention.

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Date

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Hon. Katherine B. Forrest, U.S.D.C.