

**Matter of Abrams Fensterman, LLP v People**

2025 NY Slip Op 34107(U)

October 24, 2025

Supreme Court, New York County

Docket Number: Index No. 453019/2024

Judge: Emily Morales-Minerva

Cases posted with a "30000" identifier, i.e., 2013 NY Slip Op 30001(U), are republished from various New York State and local government sources, including the New York State Unified Court System's eCourts Service.

This opinion is uncorrected and not selected for official publication.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 42

-----X

In the Matter of the Application of

INDEX NO. 453019/2024

ABRAMS FENSTERMAN, LLP

MOTION DATE 08/05/2025

Petitioner,

MOTION SEQ. NO. 003

To Quash Subpoena, Pursuant to CPLR § 2304, against

People of the State of New York, by Letitia James, Attorney  
of the State of New York,

**DECISION + ORDER ON  
MOTION**

Respondent.

-----X

The following e-filed documents, listed by NYSCEF document number (Motion 003) 68, 69, 70, 71, 72  
were read on this motion to/for QUASH SUBPOENA, FIX CONDITIONS

APPEARANCES:

Abrams Fensterman, LLP, Brooklyn, New York (Alyssa A. Friedman, of counsel), for petitioner.

People of the State of New York, by Letitia James, Attorney of the State of New York, New York, New York, (Assistant Attorney Generals: Glenna Goldis, Esq., Christopher McCall, Benjamin Fishman, Esq., and Laura J. Levine, Esq., of counsel), for respondent.

HON. EMILY MORALES-MINERVA:

Petitioner Abrams Fensterman, LLP, commenced this special proceeding, by order to show cause (motion seq. no. 001), to quash the subpoena of respondent People of the State of New York, by Letitia James, Attorney of the State of New York, New York, New York (NYAG); NYAG issued said subpoena as part of a civil investigation into petitioner's potential illegal debt

collection practices that targets the friends and family members of nursing home residents.

In the alternative, petitioner seeks a protective order, pursuant to CPLR § 3103 (a), governing prevention of abuse relating to the use of any disclosure device, and limiting "inquiries" to "those that are legally justifiable and appropriate" (New York State Court Electronic Filing System [NYSCEF] Doc. No. 01, petition, dated July 24, 2024, p 3).

Respondent NYAG submits written opposition to the motion, and cross-moves for an order compelling petitioner to comply with the investigatory subpoena. Petitioner replies and opposes the cross-motion.

All parties appeared before the court for oral arguments on the motion, by order to show cause, and cross-motion. Now, for the reasons detailed below, the court denies petitioner's motion, by order to show cause, and grants NYAG's cross-motion.

#### BACKGROUND

On or around June 17, 2024, the People of the State of New York, by Letitia James, Attorney of the State of New York, New York, New York (NYAG), issued a subpoena duces tecum, commanding petitioner Abrams Fensterman, LLP, to deliver and to turn over all documents and information involving, among other things:

"[Third parties that petitioner sued] on behalf of a Nursing Home in an attempt to collect debt that was allegedly accrued by a Nursing Home resident who was not the Third Party, where [the Third Party] was a resident of New York State at the time such lawsuit was initiated or where such lawsuit was filed in a state or federal court in New York"

(NYSCEF Doc. No. 15, order to show cause, exhibit A, schedule of subpoena, p 5, ¶ 20).

Petitioner refused to turn over any requested information, but requested NYAG withdraw the subpoena. The parties met for discussions which were unsuccessful.

Petitioner does not dispute that, during their meeting, NYAG requested the firm submit proposals to narrow the subpoena in an effort to resolve their differences (see NYSCEF Doc. No. 34, memorandum of law in opposition to petitioner's order to show cause, p 5). However, petitioner neither asserted particularized objections to the subpoena nor made any request beyond a withdrawal or, in the alternative, extension of the subpoena return date.

Petitioner then commenced this special proceeding, by order to show cause, to quash the subpoena. In support, petitioner argues as follows: (1) that NYAG lacks a basis to issue the subpoena; (2) that the subpoena is overly burdensome, harassing, and a fishing expedition; (3) that the same is "utterly irrelevant" to NYAG's investigation of debt

collection fraud; and (4) that the subpoena lacked proper notice (see NYSCEF Doc. No. 06, memorandum of law in support of petitioner's order to show cause).

NYAG counters that the subpoena is consistent with her broad authority to investigate debt collection practices (see NYSCEF Doc. No. 34, memorandum of law in opposition to petitioner's order to show cause). NYAG further explains the basis of her inquiry is petitioner's suspected violations of the Fair Debt Collections Practices Act in the context of representing nursing homes, who seek to collect on resident's debt directly from third parties.

Finally, NYAG maintains (1) that the information sought is reasonably related to the subject of inquiry, (2) that NYAG does not seek privileged information from petitioner, and (3) that NYAG provided more than adequate notice of the subpoena (see id.).

#### ANALYSIS

#### MOTION TO QUASH

"It is ancient law that no agency of government may conduct an unlimited and general inquisition into the affairs of persons within its jurisdiction solely on the prospect of possible violations of law being discovered, especially with respect to subpoenas duces tecum"

(A'Hearn v Comm. on Unlawful Practice of Law of New York County Lawyers' Ass'n, 23 NY2d 916, 918 [1969] [citation omitted], cert denied 395 US 959 [1969]; see also Levin v Murawski, 59 NY2d 35, 40 [1983]).

However, where an attorney general issues an investigative subpoena, it is presumed that he/she/they acts in good faith (see Anheuser-Busch, Inc. v Abrams, 71 NY2d 327, 332 [1988] ["In defending (his/her/their) inquiry, the (attorney general) enjoys a presumption that (he/she/they) is acting in good faith"], citing Matter of Ryan v Lefkowitz, 26 AD2d 604 [3d Dept 1966], affd 18 NY2d 977 [1966]). Further, the one moving to quash the subpoena "has the burden of establishing that the subpoena should be vacated" (Matter of Kapon v Koch, 23 NY3d 32, 39 [2014] [citations omitted]).

"An application to quash a subpoena should be granted '[o]nly where the futility of the process to uncover anything legitimate is inevitable or obvious' . . . or where the information sought is 'utterly irrelevant to any proper inquiry'" (id., at 38; see also Anheuser-Busch, Inc., 71 NY2d at 331-332 [stating the same]).

The courts will sustain an investigatory subpoena of the attorney general if: (1) the attorney general has authority to engage in the subject investigation and issue the subpoena,

(2) an authentic factual basis exists to warrant the investigation, and (3) the information the attorney general seeks is reasonably related to the subject matter under investigation (see Matter of Evergreen Assn., Inc. v Schneiderman, 153 AD3d 87, 96 [2d Dept 2017] [quotations and citations omitted]; see also American Dental Cooperative, Inc. v Attorney General of New York, 127 AD2d 274, 280 [1st Dept 1987])).

Along with bearing "a reasonable relationship to the subject matter under investigation," the material the attorney general seeks in an investigatory subpoena must also bear a reasonable relationship to "the public interest to be served" (Matter of Giardina v James, 185 AD3d 451, 451 [1st Dept 2020]; see also Anheuser-Busch, Inc. v Abrams, supra, at 332 ["In defending [a motion to quash], the Attorney-General . . . must show only that the materials sought bear 'a reasonable relation to the subject matter under investigation and to the public purpose to be achieved'"]).

Applying these principles here, petitioner has not met its initial burden of "demonstrating a lack of authority, relevancy or factual basis for [NYAG's] issuance" of the subject subpoena (see generally Matter of Fulton Commons Care Ctr., Inc. v James, 227 AD3d 717, 718 [2d Dept 2024], citing Matter of Hogan v Cuomo, 67 AD3d 1144, 1145 [3d Dept 2009] ["The person

challenging a subpoena bears the burden of demonstrating a lack of authority, relevancy or factual basis for its issuance”)).

As to lack of authority, petitioner focuses on NYAG’s mention of the federal Nursing Home Reform Act (NHRA) in the cover letter to the investigatory subpoena (see NYSCEF Doc. No. 06, memorandum of law in support of petitioner’s order to show cause, p 5; see also NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG cover letter to subpoena duces tecum, dated June 17, 2024, at 1).<sup>1</sup> Arguing that the NHRA regulates only nursing homes, petitioner contends NYAG has no authority thereunder to investigate and issue the subpoena against it, a law firm (see NYSCEF Doc. No. 06, memorandum of law in support of petitioner’s order to show cause, p 5).

This argument appears misguided. In the cover letter, NYAG explained that petitioner’s debt collection lawsuits on behalf of nursing homes may be violating “New York and federal law, including the federal Nursing Home Reform Act” (NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG cover letter to subpoena duces tecum, dated June 17, 2024, at 1 [emphasis

---

<sup>1</sup> The cover letter provides, “Abrams Fensterman, LLP has brought a significant number of such third party lawsuits [collections lawsuits on behalf of nursing homes against individual third parties, not nursing home residents], which may violate New York and federal law, including the federal Nursing Home Reform Act, which prohibits nursing homes from subjecting third parties to personal financial liability as a condition of admitting residents” (NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG cover letter to subpoena duces tecum, dated June 17, 2024, at 1).

added]). NYAG did not mention the NHRA as the sole basis for its investigation of petitioner.

Further, the investigatory subpoena attached to the cover letter makes clear that NYAG issued the subpoena in accordance with her duty to take legal action, in the name of the People of the state of New York, against "any person [who engages] in repeated fraudulent or illegal action or otherwise demonstrate[s] persistent fraud or illegality in the carrying on, conducting or transaction of business . . ." (Executive Law § 63 [12]; see NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG subpoena duces tecum, dated June 17, 2024, at 1 ["YOU ARE HEREBY COMMANDED, pursuant to Executive Law § 63 (12), General Business Law § 349, and § 2302 (a) of the New York Civil Practice Law and Rules . . ."]).<sup>2</sup>

NYAG also cited as authority General Business Law § 349, which provides that "[d]eceptive acts or practices in the conduct of any business . . . or in the furnishing of any service in this state are . . . unlawful" (General Business Law

---

<sup>2</sup> Executive law § 63 (12) provides, in pertinent part:

"Whenever any person . . . demonstrate[s] persistent fraud or illegality in carrying on, conducting or transaction of business, the attorney general may apply . . . for an order enjoining the continuance of such business activity or of any fraudulent acts or illegal acts

. . . .  
"In connection with such application, the attorney general is authorized to take proof and make a determination of the relevant facts and issue subpoenas in accordance with the civil practice law and rules. Such authorization shall not abate or terminate by reason of any action or proceeding brought by the attorney general under this section."

§ 349 [a] [emphasis added]). Section 349 of the General Business Law further provides that “[i]n connection with any proposed proceeding,” as here -- for deceptive acts and practices unlawful -- “the attorney general is authorized to take proof . . . and to issue subpoenas in accordance with the civil practice law and rules” (General Business Law § 349 [f]).<sup>3</sup>

In addition, the unlawful act investigated here is not alleged to be, as petitioner appears to contend, that it is illicit to represent nursing homes suing third parties. Certainly, NYAG presented no argument that bringing valid actions against third parties on behalf of nursing homes or representing nursing homes accused of violating NHRA is actionable. NYAG is investigating what she suspects is petitioner’s direct misrepresentation and deception of third parties in the context of representing nursing homes to collect debts from third parties.

---

<sup>3</sup> General Business Law § 349 provides, in pertinent part:

“(b) Whenever the attorney general shall believe from evidence satisfactory to [them] that any person, firm, corporation or association or agent or employee thereof has engaged in or is about to engage in any of the acts or practices stated to be unlawful [the Attorney General] may bring an action in the name and on behalf of the people of the state of New York to enjoin such unlawful acts or practices and to obtain restitution of any moneys or property obtained directly or indirectly by any such unlawful acts or practices. In such action preliminary relief may be granted under article sixty-three of the civil practice law and rules.

“(f) in connection with any proposed proceeding under this section, the attorney general is authorized to take proof and make a determination of the relevant facts, and to issue subpoenas in connection with the civil practice law and rules” (emphasis added).

In this regard, respondent NYAG has an authentic and satisfactory factual basis to survey petitioner's practice. It is undisputed that petitioner is a New York State law firm that specializes, in large part, in representing nursing homes. Further, petitioner is one of the leading law firms filing actions on their behalf, pursuant to admissions agreements.

Broadly stated, admissions agreements obligate a person signing them to use "the resident's income and resources to pay for the [resident's] care at the nursing home" (NYSCEF Doc. No. 36, reply memorandum of law in support of petitioner's order to show cause, p 4 [emphasis added]). As petitioner does not dispute, these agreements generally do not make the signing party -- who is not the nursing home resident -- personally responsible for paying the resident's debt to the nursing home.

However, during a preliminary investigation into petitioner's practice, NYAG, Bureau of Consumer Frauds and Protection, discovered -- at or around 12 lawsuits -- in which petitioner asserts individual collection claims against signatories of admissions agreements, who are not nursing home residents (see NYSCEF Doc. No. 21, affirmation of Glenna Goldis, Assistant Attorney General, p 4, ¶ 18-22).<sup>4</sup>

---

<sup>4</sup> The affirmation provides, "[t]he specific case about which the Subpoena requests records, *Parker Jewish Institute for Health Care and Rehabilitation v Mays* . . . , includes a claim against a third party for alleged breach of an admissions agreement. As in the 16 cases referenced [previously in the same affirmation] the *Mays* complaint seeks recovery of the resident's full alleged

453019/2024 ABRAMS FENSTERMAN, LLP vs. TO QUASH SUBPOENA Page 10 of 20  
Motion No. 003

The preliminary investigation also discovered that many of the complaints petitioner files -- on behalf of nursing homes against third parties -- seek "the full amount allegedly owed by the resident, without alleging [that] the third party transferred or misappropriated the resident's funds, or even that the resident ever possessed the full amount owed" (id. at 4, ¶ 22 [emphasis added]).

The lack of these allegations appears key to NYAG's concern that petitioner may be engaging in misleading and/or fraudulent debt collection practices. As NYAG explains, these allegations constitute exceptions to the prohibition of seeking direct payment from a third party signatory to an admission agreement. Therefore -- the absence in these lawsuits of a third party's purported transfer or misappropriation of the residents' funds -- suggests the necessity of additional scrutiny on behalf of the public.

Given NYAG's prefatory findings, a sufficient basis appears to exist for the issuance of the subject investigatory subpoena. Indeed, "[t]he information forming [the requisite] factual basis [for an investigatory subpoena] . . . 'need not be sufficient to establish fraud or illegality, or even provide probable cause as

---

debt from the third party, apparently based on nothing more than the third party's signature on an admissions agreement" (NYSCEF Doc. No. 21, affirmation of Glenna Goldis, Assistant Attorney General, p 4, ¶ 21).

long as the futility of the process is not inevitable or obvious'" (Matter of Fulton Commons Care Ctr., Inc., 227 AD3d at 719 [emphasis added] [quotation and citations omitted]). Here, such futility is neither inevitable nor obvious.

The information NYAG seeks is also "reasonably related to a proper subject of inquiry" (Matter of People v VDARE Found., Inc., 224 AD3d 516, 517 [1st Dept 2024]). Plainly, the subpoena seeks information limited in scope to actions where petitioner represents or represented a nursing home in a lawsuit to collect a resident's debt against a third party, (1) if the third party was a resident of New York State at the time the lawsuit was initiated, or (2) if petitioner filed the lawsuit in a state or federal court in New York (NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG subpoena duces tecum, schedule, at p 5, ¶ 20).

Petitioner argues the materials sought are "a large amount of privileged information" (NYSCEF Doc. No. 06, memorandum of law in support of petitioner's order to show cause, p 11), and "so obviously protected by attorney client privilege and work product privilege" (id. at 13). However, these assertions are unavailing for being stated in conclusory terms only. What is presented as flippantly "obvious" to petitioner is not so to this Court.

Indeed, petitioner has the burden to show "that the communication at issue was between an attorney and a client for the purpose of facilitating the rendition of legal advice or services, in the course of a professional relationship, that the communication is predominantly of a legal character, that the communication was confidential and that the privilege was not waived" (see NYASHA Servs., Inc., Self-Insurance Trust v People Care, Inc., 155 AD3d 1208, 1210 [3d Dept 2017], quoting Ambac Assur. Corp. v Countrywide Home Loans, Inc., 27 NY3d 616, 624 [2016]).

"This burden is imposed because of the strong policy in favor of full disclosure" and it "cannot be satisfied [as attempted here] with wholly conclusory allegations" (Sinatra & Co. Real Estate, LLC v 1000 Elmwood Assoc., LLC, 207 AD3d 1158, 1160 [4th Dept 2022] [quotations and citations omitted]; see also Madison Mut. Ins. Co. v Expert Chimney Servs., Inc., 103 AD3d 995, 996 [3d Dept 2013]). The Court of Appeals is clear that "[a] party's own labels are obviously not determinative of work product, and the generalized descriptions -- lacking identification of persons, time periods and circumstances -- do not convey the information and analysis necessary to decide whether a particular document should be immunized from disclosure under CPLR 3101 (c) or (d)" (Spectrum Sys. Int'l Corp. v Chem. Bank, 78 NY2d 371, 381 [1991]).

Appropriately, page 7, paragraph 10, of the schedule to NYAG's subpoena recognizes petitioner's right to claim privilege with "detail" and under "oath" in the context of compliance (NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG subpoena duces tecum, schedule, p 7, ¶ 10).<sup>5</sup> Therein, and, on record during arguments, NYAG made clear that she does not seek petitioner's privileged communications. Further, as undisputed here, NYAG unsuccessfully welcomed petitioner to propose ways to narrow the subpoena and to assert particularized objections.

Given NYAG's posture, it appears that -- if petitioner undertakes the work of identifying materials with specificity to which it believes the privilege applies -- the parties can work to resolve the instant dispute or, at least, to narrow it. Thereafter, if disagreement continues, the court may assist with an in-camera review of the disputed materials.

Inarguably, the Court of Appeals has long recommended "that a party seeking to protect documents from disclosure compile a privilege log in order to aid the court in its assessment of a

---

<sup>5</sup> Paragraph 10 provides: "Privilege. If You withhold or redact any Document responsive to this Subpoena on ground of privilege or other legal doctrine, You shall submit with the Documents produced a statement in writing under oath, stating: (a) the document control numbers(s) of the Document withheld or redacted; (b) the type of Document; (c) the date of the Document; (d) the author(s) and recipient(s) of the Document; (e) the general subject matter of the Document; and (f) the legal ground for withholding or redacting the Document. If the legal ground for withholding or redacting the Document is attorney-client privilege, You shall indicate the name of attorney(s) whose legal advice is sought or provided in the Document" (NYSCEF Doc. No. 15, order to show cause, exhibit A, NYAG subpoena duces tecum, schedule, p 7, ¶ 10).

privilege claim and enable [the court] to undertake an in-camera review" (Park Assocs., Inc. v N.Y. State AG (In re Subpoena Duces Tecum to Jane Doe), 99 NY2d 434, 442 [2003], citing United States v Construction Prods. Research, Inc., 73 F3d 464, 473 [2d Cir 1996], cert denied 519 US 927 [1996]). "The log should specify the nature of the contents of the documents, who prepared the records and the basis for the claimed privilege" (id.). Petitioner must do the work or there will be no such opportunity.

In this regard, petitioner argues that a "privilege log . . . will be voluminous given the number of client and work product files" (NYSCEF Doc. No. 06, memorandum of law in support of petitioner's order to show cause, p 13, n 7). However, a subpoena itself is not rendered invalid, overbroad or unduly burdensome just because it requires a substantial number of documents (see generally Matter of Evergreen Assn., Inc. v Schneiderman, supra, at 99). Therefore, no basis exists for this court to agree with petitioner's seeming proposition that the need to review a substantial number of documents for purposes of composing a privilege log renders such a log dispensable.

To the extent petitioner argues that NYAG may obtain the pertinent information elsewhere, this assertion is in tension with petitioner's broad claim that the materials requested are

entirely "protected by attorney client privilege and work product privilege" (NYSCEF Doc. No. 06, memorandum of law in support of petitioner's order to show cause, p 13).

In any event, NYAG has no general requirement to demonstrate that it cannot obtain the requested disclosure from any other source (Matter of Kapon v Koch, supra, at 38 ["(CPLR §) 3101 (a) (4) imposes no requirement that the subpoenaing party demonstrate that it cannot obtain the requested disclosure from any other source"]). Again, there must be more, which petitioner is lacking in assertions here.

Finally, petitioner's argument that the subpoena will require it to review thousands of pages of records and usurp thousands of hours, is also not grounds to quash the subpoena. Again, "[t]he fact that a subpoena requires production of a substantial number of documents does not render it invalid, overbroad, or unduly burdensome" (Matter of Evergreen Assn., Inc. v Schneiderman, supra, at 99, citing All-Waste Sys. V Abrams, 155 AD2d 401 [1989]). The test of the validity of a subpoena is "relevancy, and not quantity" (id., at 99 [emphasis added] [quotations and citations omitted]).

The Court also rejects petitioner's argument that NYAG's notice of the investigatory subpoena was insufficient (see NYSCEF Doc. No. 06, memorandum of law in support of petitioner's order to show cause to quash, p 14). In this regard, petitioner

misplaces its reliance of CPLR § 3101 (a) (4), which requires full disclosure "in the prosecution or defense of an action" by "any other person [not a party to the action] upon notice stating the circumstances or reasons such disclosure is sought."<sup>6</sup>

Plainly, there is no action or defense of an action here, only a proposed action for deceptive debt collection. Further, it is black letter law that, "[i]n connection with any proposed proceeding" for deceptive practices in furnishing any service in this state, "the attorney general is authorized to take proof and make a determination of the relevant facts, and to issue subpoenas in accordance with the civil practice law and rules" (General Business Law § 349 [f] [emphasis added]).

Finally, to the extent that petitioner seeks a protective order against NYAG, the court declines to issue the same (see CPLR § 3103). NYAG is fulfilling her duties in acquiring information concerning possible misleading or fraudulent collection practices. Further, petitioner has not established a basis to deny, limit or condition the subpoena with its largely conclusory submissions (see e.g. CPLR § 3103 [a]).<sup>7</sup>

---

<sup>6</sup> CPLR § 3101 (a) (4) provides: "There shall be full disclosure of all matter material and necessary in the prosecution or defense of an action, regardless if the burden of proof, by: any other person, upon stating the circumstances or reasons such disclosure is sought or required."

<sup>7</sup> CPLR § 3103 (a) provides, "The court may at any time on its own initiative, or on motion of any party or of any person from whom or about whom discovery is sought, make a protective order denying, limiting, conditioning or regulating the use of any disclosure device. Such order shall be designed to prevent unreasonable annoyance, expense, embarrassment, disadvantage, or other prejudice to any person or the courts."

## CROSS-MOTION TO COMPEL

"Unless otherwise provided, if a person fails to comply with a subpoena which is not returnable in a court, the issuer or person on whose behalf the subpoena was issued may move in the supreme court to compel compliance. If the court finds that the subpoena was authorized, it shall order compliance and may impose costs not exceeding fifty dollars"

(CPLR § 2308 (b) (1) [emphasis added]).

Here, as explained in more detail in the above section, NYAG is clearly authorized to issue the subject investigatory subpoena. Indeed, in the name of the People of the state of New York, she has a duty to take action against "any person [that engages] in repeated fraudulent or illegal action or otherwise demonstrate[s] persistent fraud or illegality in the carrying on, conducting or transaction of business . . ." (Executive Law § 63 [12] [reproduced at n 2]). "Deceptive acts or practices . . . in the furnishing of any service in this state are . . . unlawful" (General Business Law § 349 [f] [reproduced at n 3]). And -- "[i]n connection with any proposed proceeding" thereunder -- "the attorney general is authorized to [among other things] issue subpoenas in accordance with the civil practice law and rules" (id. [emphasis added]).

Further, as also discussed in greater detail previously, an authentic factual basis exists to warrant NYAG's investigation,

and the information sought in the subject subpoena is reasonably related to the subject matter under investigation and the public interest sought to be protected (see generally Matter of Evergreen Assn., Inc. v Schneiderman, supra, at 86 [quotations and citations omitted]; see also American Dental Cooperative, Inc. v Attorney General of New York, supra, at 280).

Accordingly, it is

ORDERED that the motion, by order to show cause (seq. no. 03), of petitioner ABRAMS FENSTERMAN, LLP, is denied in its entirety; it is further

ORDERED that the cross-motion of respondent Attorney General of the State of New York to compel petitioner ABRAMS FENSTERMAN, LLP, to comply with the investigatory subpoena is granted; it is further


ORDERED that upon respondent's service of a copy of this order with notice of entry, petitioner ABRAMS FENSTERMAN, LLP, shall respond to the Attorney General's investigatory subpoena within 30 days, or any agreed upon adjourned date, set forth in a writing between the Attorney General's Office and petitioner; it is further

ORDERED that respondent shall serve petitioner with a copy of this order and notice of entry by November 01, 2025; and it is further

ORDERED that the Clerk of the Court shall mark the file accordingly.

THIS CONSTITUTES THE DECISION AND ORDER OF THE COURT.

Date: October 24, 2025

  
\_\_\_\_\_  
Emily Morales-Minerva, J.S.C