

At IAS Part 12 of the Supreme Court  
of the State of New York, held in and for  
the County Kings at the Courthouse, located at 360  
Adams Street, Brooklyn, New York,  
on the 30 day of April, 2015

**HON. LAURAL JACOBSON**

**PRESENT:** , J.S.C.

-----X  
KAILASH MEHTA AND ANITA MEHTA,

Index No. 5443/15

**ORDER TO SHOW CAUSE  
FOR A TRO AND  
PRELIMINARY INJUNCTION**

Plaintiff,

-against-

CHARLES SCHWAB & CO., INC.,

Defendants.  
-----X

Upon reading the application brought by Order to Show Cause submitted on behalf of Plaintiff KAILASH MEHTA AND ANITA MEHTA, by their attorneys herein, TAMIR LAW GROUP, PC, consisting of the Affirmations of Zaki Isaac B. Tamir., the Affirmations of Kailash Mehta and Anita Mehta, all dated April 29, 2015, and the Summons and Verified Complaint, verified on April 29, 2015, and all proceeding heretofore had herein, *and sufficient reason appearing therefor*,

LET Defendant Charles Schwab & Co., Inc., show cause at an IAS Part 64 of this Court, to be held at the Courthouse thereof, located at 360 Adams Street, Brooklyn, New York, Room 296

the 13<sup>th</sup> day of May, 2015, at 9:30 o'clock in the Fore noon of that day, or as soon thereafter as counsel can be heard why an Order should not be entered herein pursuant to CPLR

6301, issuing a preliminary injunction:

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1. compelling Defendant Charles Schwab & Co., Inc. to restore the full access and authority over Kailash and Anita Mehta's account at Charles Schwab & Co., Inc. (the "Account") and the funds on deposit therein to Plaintiff Kailash and Anita Mehta;
2. compelling Defendant Charles Schwab & Co., Inc. to remove the hold that has been placed on the Account;
3. preventing Charles Schwab & Co., Inc. from placing another hold on the Account without giving the Plaintiff the ability to immediately lift any such hold (without requiring further court orders or the consent of anyone else); and
4. for all such other and further relief as this Honorable Court may deem just and proper.

*Sufficient reason appearing therefor,*

*Stay*  
IT IS HEREBY ORDERED that, pending the hearing of this application Charles Schwab & Co., Inc. is immediately compelled to:

1. restore the full access and authority over Plaintiff's Account and the funds on deposit therein to the account holder's Kailash and Anita Mehta;
2. to remove the hold that Charles Schwab & Co., Inc. has placed on the Account;
3. prevent Charles Schwab & Co., Inc. from placing another hold on the Account without giving the Plaintiff's Kailash and Anita Mehta the ability to immediately lift any such hold (without requiring further court orders or the consent of anyone else); and
4. for all such other and further relief as this Honorable Court may deem just and proper.

*personal*  
LET service of a copy of this Order, together with a copy of the papers upon which same

is granted, upon the Defendant Charles Schwab & Co., Inc. on or before the 30th day of May

be deemed good and sufficient notice of this application and Order.

ENTER

*5sc denied w/ leave to renew on 5/1/15 if RCB is unsuccessful obtaining a \$1 million*  
HON. LAURA JACOBSON