

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

CAYUGA NATION, by and through its lawful
governing body, the CAYUGA NATION COUNCIL,

Plaintiff,

v.

DUSTIN PARKER, NORA WEBER, JOSE VERDUGO, JR.,
ANDREW HERNANDEZ, PAUL MEYER, BLUE BEAR
WHOLESALE, LLC, IROQUOIS ENERGY GROUP, INC.,
JUSTICE FOR NATIVE FIRST PEOPLE, LLC, AND C.B.
BROOKS LLC, AND JOHN DOES 1-10,

Defendants.

Case No: 5:22-cv-00128-
BKS-ATB

**Defendants Paul Meyer,
Justice for Native First
People, LLC, and C.B.
Brooks, LLC's Notice
of Motion for Judgment
on the Pleadings
Pursuant to Fed. R. Civ.
P. 12(c)**

PLEASE TAKE NOTICE that Defendants Paul Meyer, Justice for Native First People, LLC, and C.B. Brooks, LLC (collectively "Meyer Defendants"), by their Counsel, Camardo Law Firm, P.C., will move this Court, before the Honorable Brenda K. Sannes, United State District Court Judge, at the United States District Courthouse for the Northern District of New York, located at 100 S. Clinton Street, Syracuse New York at a time and place to be scheduled by this Court, for an Order Dismissing Count II of the Complaint pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, and for such other further relief that the Honorable Court deems appropriate.

This Motion is based upon the pleadings and proceedings heretofore had herein, upon the Affirmation of Joseph A. Camardo, Jr., Esq. dated August 14, 2025, and Meyer Defendants' Memorandum of Law in support of this Motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule of Civil Procedure 7(b)(1), all parties are required to file and serve opposing papers at least twenty-one (21) days prior to the return date.

Dated: Auburn, New York
August 13, 2025

Respectfully submitted,

/s/ Joseph A. Camardo, Jr.
Joseph A. Camardo, Jr., Esq.
Camardo Law Firm, PC
Attorneys for Defendants
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AND C.B. BROOKS, LLC
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