

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

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**LITTLE REST TWELVE, INC., and IMEDINVEST  
PARTNERS,**

**Plaintiffs,**

*- against-*

**INDEX NO. 600676-2007**

**RAYMOND VISAN, GEORGE V. RESTAURATION,  
S.A., CREATIVE DESIGN FOR RESTAURANTS  
AND BARS LTD., JEAN-YVES HAOUZI , ET AL,**

**Defendants.**

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NINA ZAJIC, being duly sworn, deposes and says:

1. **THIS EMERGENT APPLICATION STEMS FROM UNLAWFUL AND VIOLENT ACTIONS OF THE DEFENDANT JEAN-YVES HAOUZI AND HIS LAWYER, NON-PARTY MARTIN RUSSO, WHO ON MARCH 31, 2010, ACCOMPANIED BY APPROXIMATELY 20 ARMED MEN INVADED THE PREMISES OF THE PLAINTIFF, BY PHYSICAL FORCE, THREATENED THE EMPLOYEES OF THE PLAINTIFF AND LOCKED OUT THE PLAINTIFF’S OFFICERS AND MANAGEMENT.**

2. I am the CEO of the Plaintiff Little Rest Twelve, Inc. (“Plaintiff”). (Exhibit 1) As this Court is aware, from the three years of proceedings, Plaintiff operates Ajna Bar (formerly Buddha Bar NYC), an internationally acclaimed dining and entertainment establishment, regularly featured in major international media, including New York Times, New York Post, USA Today, Bloomberg News, Newsday; and many others. I make this affidavit in support of an Order to Show Cause for relief requested herein.

3. As a CEO of the Plaintiff, pursuant to the Resolution of the Board of Directors of the Plaintiff-corporation Little Rest Twelve, Inc., I have commenced this action on behalf of the Plaintiff in March of 2007. Haouzi, a former employee of the Plaintiff, who was fired for fraud and theft shortly prior to commencement of this action, has been named defendant herein.

4. Haouzi, on numerous occasions, during the pendency of this action, telephoned me and, in a threatening manner, expressed his “displeasure” about the Court’s taking too long to decide this matter. Haouzi made threats that he would “expedite” this matter “in his own way.”

5. Yesterday, on March 31, 2010, Haouzi made good on his threat. Rather than making an appropriate application to this Court for whatever relief he may have sought, Haouzi and Russo, in a gangland manner, endeavored an apparently long-planned raid upon the Plaintiff’s premises, ransacking the premises and locking out the Plaintiff’s legitimate management. Haouzi and Russo, accompanied by approximately 20 armed men invaded the premises of the Plaintiff by force; threatened employees of the Plaintiff; broke into the safe and removed over \$50,000 in cash; changed locks on the doors and physically removed me, Plaintiff’s vice president David Kay, and Plaintiff’s Controller Joseph Gill from the premises.

6. The police were summoned to the scene. Russo falsely holding himself out to be the lawyer for the Plaintiff, represented to the Police that he had “authority from this Court” to enter the premises and to remove the management, including the undersigned. In addition, Russo presented to the Police a number of bogus “resolutions” purporting to discharge the management of the Plaintiff. As a result of Russo’s false representations and his status as a New York attorney, Police refused to remove him and other invaders from the premises of the Plaintiff pending this Court’s decision on this matter. (Exhibit 2.)

7. In addition, I have learned from the Signature Bank, and HSBC Bank, where the Plaintiff maintains back accounts, that Russo wrote to these banks as the “lawyer for Little Rest Twelve” demanding to freeze the Plaintiff’s accounts. I was advised that, as a result of these letters, the accounts of the Plaintiff have indeed been frozen, pending this Court’s resolution of this incident.

8. Haouzi and Russo are well aware that the undersigned and other officers of the Plaintiff are indeed the only legitimate management of the Plaintiff. The affirmation of Russo’s law partner, Marlen Kruzhev, filed in this action on April 9, 2009 (Exhibit 3) acknowledges in ¶7 the undersigned’s authority as an officer and director of the Plaintiff.

9. Even more remarkable, is that Mr. Kruzhev and Mr. Russo yesterday purported to commence an action in this court under Index No. 650209/2010 in the name of the Plaintiff Little Rest Twelve and used these sham pleadings to convince the Police and employees of the Plaintiff that “plaintiff’s ownership has changed.”

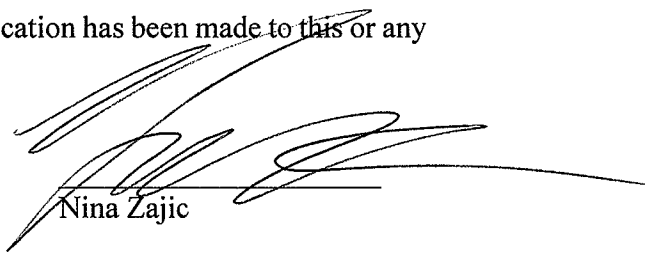
10. As a result of Haouzi’s, Russo’s and Kruzhev’s transgressions described above, the Plaintiff’s premises are now in the hands of these individuals and the Plaintiff is on the verge of closing down.

11. Haouzi, Russo and their confederates have unlawfully seized control of the Plaintiff’s premises, using force and threat of force to intimidate my staff and deceived the police by fraudulent documents and representations that their “authority” stems from this Court’s directives. The undersigned respectfully submits that this is New York City, not a Wild West and controversies pending before this Honorable Court may not be resolved by raiding Plaintiff’s premises, breaking into the Plaintiff’s safe and stealing its monies and other mob-style actions.

12. The undersigned respectfully request that this Court restore the status quo and restrain

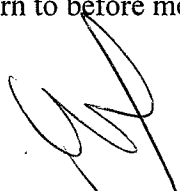
Haouzi, Russo and Kruzhkov from their gangland actions and direct them to vacate the Plaintiff's premises forthwith and return the documents, monies and personal items taken by force; and further requests to direct the Signature Bank and the HSBC to "unfreeze" the Plaintiff's accounts.

13. No previous request for the relief requested in this application has been made to this or any other court.



Nina Zajic

Sworn to before me this 1st day of April, 2010



WILLIAM P. WALZER  
Notary Public, State of New York  
No. 30-4758889  
Qualified in Nassau County  
Term Expires 7-31-2010