

COURT OF CLAIMS: STATE OF NEW YORK

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BAKANAY ABDUSALAMOVA, as wife and guardian of
the person of MAGOMED ABDUSALAMOV, an incapacitated
person, BAKANAY ABDUSALAMOVA, as mother and natural
guardian of PATIMAT ABDUSALAMOVA, an infant, BAKANAY
ABDUSALAMOVA, as mother and natural guardian of SHAKRIZAT
ABDUSALAMOVA, an infant, BAKANAY ABDUSALAMOVA,
as mother and natural guardian of SAYGIBAT ABDUSALAMOVA,
an infant, BAKANAY ABDUSALAMOVA, individually, and
CHARLES J. THOMAS, as proposed guardian of the property of MAGOMED
ABDUSALAMOV, an incapacitated person,

**NOTICE OF INTENTION
TO FILE CLAIM**

Claimants,

-against-

THE STATE OF NEW YORK,
THE NEW YORK STATE ATHLETIC COMMISSION and
THE NEW YORK STATE BOXING COMMISSION,

Respondents.
-----X

TO: THE CLERK OF THE COURT OF CLAIMS

TO: THE ATTORNEY GENERAL OF THE STATE OF NEW YORK

PLEASE TAKE NOTICE that the undersigned, BAKANAY ABDUSALAMOVA, as wife
and guardian of the person of MAGOMED ABDUSALAMOV, an incapacitated person,
BAKANAY ABDUSALAMOVA, individually, and CHARLES J. THOMAS, as proposed guardian
of the property of MAGOMED ABDUSALAMOV, an incapacitated person, intend to file a claim
against the STATE OF NEW YORK, pursuant to Court of Claims Act §§ 10 and 11.

The Post Office Addresses Of The Claimants Herein Are As Follows:



STATE OF NEW YORK
ATTORNEY GENERAL
MAILING ATTNY'S OFC
RECEIVED
2011 JAN 30 PM 2:49

The Attorneys For The Claimants Herein Are As Follows:

PAUL J. EDELSTEIN, ESQ.
THE EDELSTEINS, FAEGENBURG & BROWN
61 Broadway, Suite 2210
New York, New York 10006
Tel. (212) 425-1999

**The Time When And The Place Where The Claim Arose And The Nature Of
The Same Are As Follows:**

The claim arose on November 2, 2013 when the Claimant MAGOMED ABDUSALAMOV was engaged as a participant and or competitor in a professional boxing match at Madison Square Garden in New York City, New York, which was sanctioned, overseen, supervised and controlled by the Respondents, their agents, servants and/or employees.

The claim arose as a result of the carelessness, negligence, medical malpractice and wanton disregard on the part of the Respondents, their agents, servants and/or employees and without any negligence on the part of the Claimant, MAGOMED ABDUSALAMOV, who was caused, allowed and permitted to be repeatedly, seriously, unreasonably and violently beaten, bludgeoned, punched and pummeled by his opponent without proper, timely or adequate recognition, termination and/or rescue and that the Claimant, MAGOMED ABDUSALAMOV, was further caused, allowed and permitted to sustain life threatening injuries including but not limited to acute traumatic brain injury, significant and permanent brain damage, coma and multiple comminuted facial fractures due to the improper, untimely and inadequate medical care and treatment on the part of the Respondents, their agents, servants and/or employees.

The Claimant, BAKANAY ABDUSALAMOVA, wife of Claimant, MAGOMED ABDUSALAMOV, claims damages for loss of services and loss of consortium of her husband and for medical expenses she was caused to expend and will continue to expend in the future.

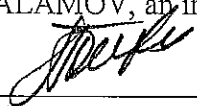
The Claimants, PATIMAT ABDUSALAMOVA, SHAKHRIZAT ABDUSALAMOVA, and SAYGIBAT ABDUSALAMOVA, by their mother and natural guardian, BAKANAY ABDUSALAMOVA, claims damages for loss of parental guidance, loss of parental services, and economic loss, due to the incapacitation of MAGOMED ABDUSALAMOV, father of the three infant children.

Claimants demand damages in the sum of \$100,000,000.00.

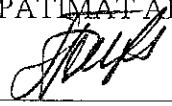
Dated: New York, New York
January 28, 2014\



BAKANAY ABDUSALAMOVA, individually, and as wife and guardian of the person of MAGOMED ABDUSALAMOV, an incapacitated person



BAKANAY ABDUSALAMOVA, as mother and natural guardian of PATIMAT ABDUSALAMOVA, an infant

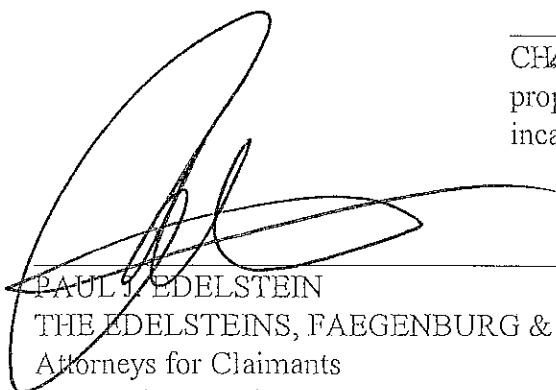


BAKANAY ABDUSALAMOVA, as mother and natural guardian of SHAKHRIZAT ABDUSALAMOVA, an infant



BAKANAY ABDUSALAMOVA, as mother and natural guardian of SAYGIBAT ABDUSALAMOVA, an infant

CHARLES J. THOMAS, as proposed guardian of the property of MAGOMED ABDUSALAMOV, an incapacitated person



PAUL J. EDELSTEIN
THE EDELSTEINS, FAEGENBURG & BROWN
Attorneys for Claimants
61 Broadway, Suite 2210
New York, New York 10006
Tel. (212) 425-1999

INDIVIDUAL VERIFICATION

STATE OF NEW YORK:

SS:

COUNTY OF _____ :

The undersigned, being duly sworn, deposes and says that the undersigned is the claimant in the within action; that I have read the foregoing Notice of Intention To File Claim and know the contents thereof; that the same is true to my knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters I believe it to be true.

BAKANAY ABDUSALAMOVA, individually, and as wife and guardian of the person of MAGOMED ABDUSALAMOV, an incapacitated person

Sworn to before me this
28th day of January, 2014

GLENN FAEGENBURG
Notary Public, State of New York
No. 02FA5000427
Qualified in New York County
Commission Expires Aug. 17, 2014

INDIVIDUAL VERIFICATION

STATE OF NEW YORK:

SS:

COUNTY OF _____ :

The undersigned, being duly sworn, deposes and says that the undersigned is the claimant in the within action; that I have read the foregoing Notice of Intention To File Claim and know the contents thereof; that the same is true to my knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters I believe it to be true.

BAKANAY ABDUSALAMOVA, as mother and natural guardian of PATIMAT ABDUSALAMOVA, an infant

Sworn to before me this
28th day of January, 2014

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BAKANAY ABDUSALAMOVA, as mother and natural guardian of SHAKHRIZAT ABDUSALAMOVA, an infant

Sworn to before me this
28th day of January, 2014

GLENN FAEGENBURG
Notary Public, State of New York
No. 02FAS00427
Qualified in New York County
Commission Expires Aug. 17, 2014

INDIVIDUAL VERIFICATION

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SS:

COUNTY OF _____ :

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BAKANAY ABDUSALAMOVA, as mother and natural guardian of SAYGIBAT ABDUSALAMOVA, an infant

Sworn to before me this
28th day of January, 2014

GLENN FAEGENBURG
Notary Public, State of New York
No. 02FAS00427
Qualified in New York County
Commission Expires Aug. 17, 2014

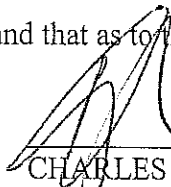
INDIVIDUAL VERIFICATION

STATE OF NEW YORK:

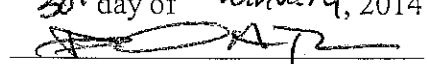
SS:

COUNTY OF *New York*

The undersigned, being duly sworn, deposes and says that the undersigned is the claimant in the within action; that I have read the foregoing Notice of Intention To File Claim and know the contents thereof; that the same is true to my knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters I believe it to be true.



CHARLES J. THOMAS, as *temporary* guardian of the property of MAGOMED ABDUSALAMOV, an incapacitated person

Sworn to before me this
30th day of *January*, 2014


DANIEL A. THOMAS
Notary Public State of New York
No. 02TH5058678
Qualified in New York County
Commission Expires April 15, 20*14*