

Print or type, double spaced, using **black** ink only.

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

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Manuel Martinez
[fill in name(s)] Plaintiff(s),

Index Number

452139/2017

- against-
910 Riverside LLC and Irene Shreyberg
[fill in name(s)] Defendant(s).

ANSWER

To Counterclaims

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As and for his / her answer to the complaint herein, the defendant, 910 Riverside LLC and Irene Shreyberg respectfully shows and alleges as follows [number separate paragraphs below]:

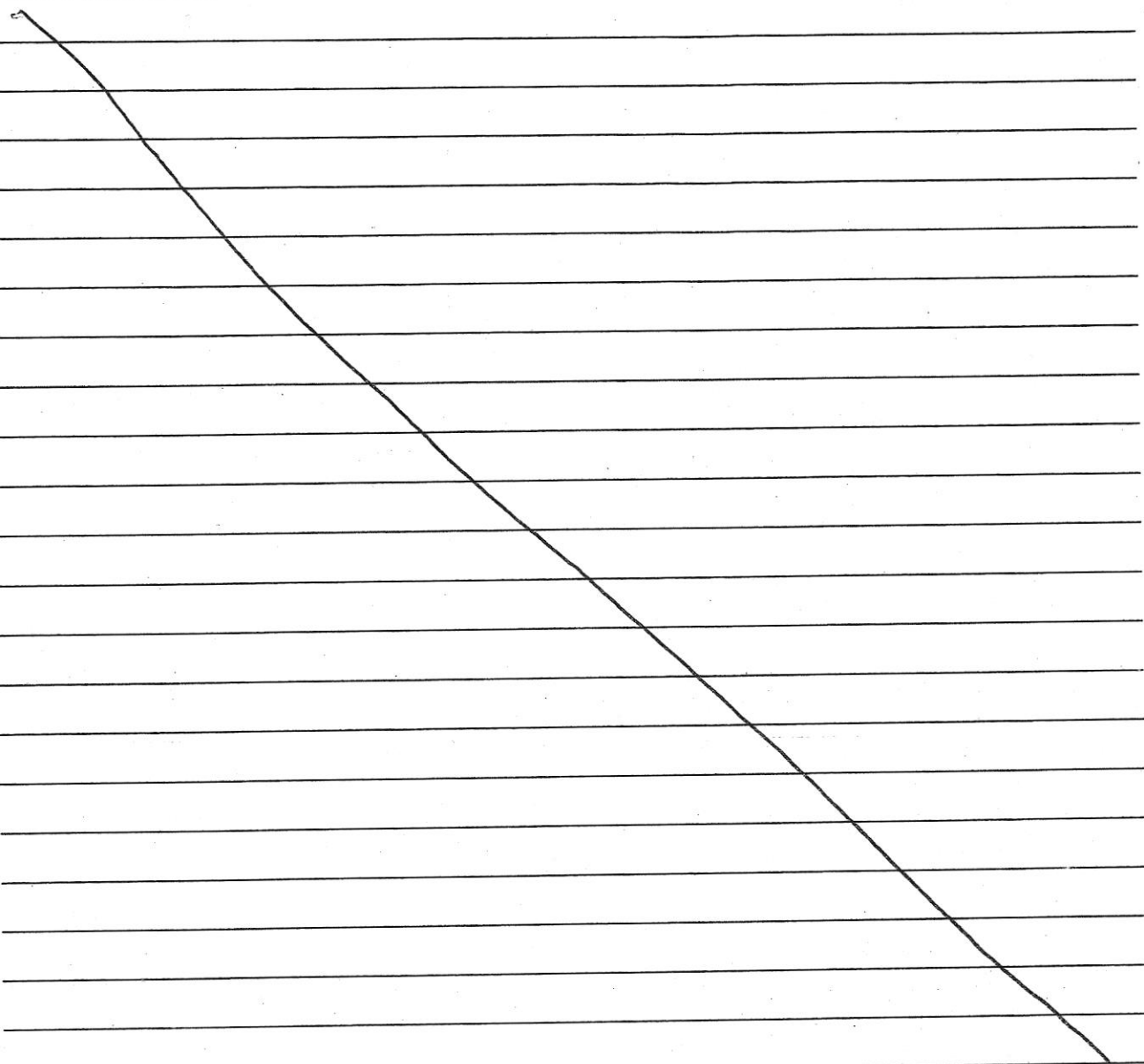
_____. Admits the truth of the allegation(s) of Paragraph(s) 23, 34, 35, 36, 37, 37(1), 37(2), 37(3), 37(5), 39(1) of the complaint. 39(2), 39(3)

_____. Denies knowledge or information sufficient to form a belief as to the truth of the allegation(s) of Paragraph(s) 30, 32, 32(A), 32(B), 32(C), 32(D), 37(4) of the complaint. 38, 40, 41, 42.

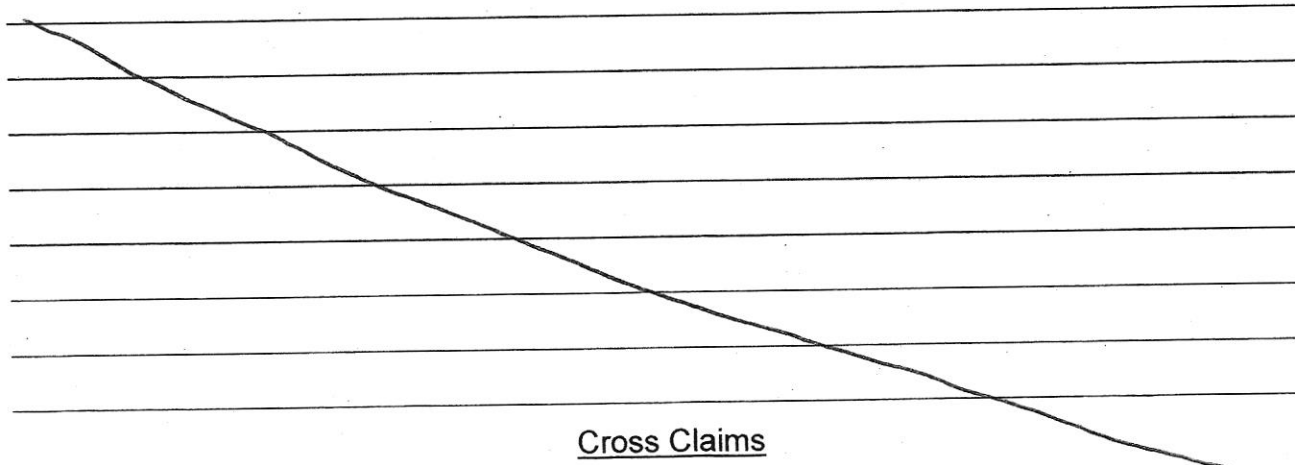
_____. Denies the allegations of Paragraph(s) 30, 32, 32(A), 32(B), 32(C), 32(D), 37(4), 38, 40, 41, 42 of the complaint.

Affirmative Defenses

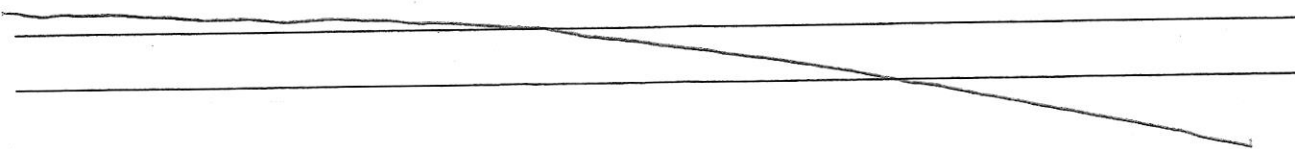
Honorable Judge in all actuality the Defendants are trying to turn this accident into a scheme and fraud. But your Honor it is impossible to keep a fraudulent lifestyle for nine (9) years, no one frauds multiple surgeries and recoveries that are this detrimental to my life, I cannot fraud the pain and suffering I have endured for the past (9) years, your Honor and on top of all this that I've been through they continue to doubt the pain and suffering that I have endured and still not able to walk without a cane or backbrace. I would like the Blaming to stop.



Counterclaims

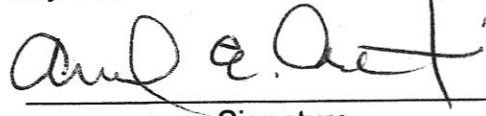


Cross Claims



WHEREFORE, defendant prays that this court dismiss the complaint of the plaintiff herein, with costs and disbursements to defendant, together with any other relief the Court finds to be just and proper.

Dated: November 30, 2023



Signature

Manuel Martinez

Print name

271 Fort Washington Ave

New York, N.Y. 10032

(929) 696-3042

Address and Telephone Number

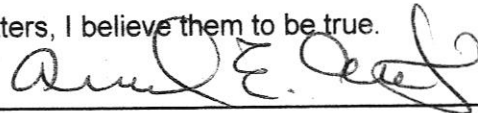
VERIFICATION

STATE OF NEW YORK

COUNTY OF NEW YORK ss:

MANUEL MARTINEZ, being duly sworn, deposes and says:

I am the/a defendant in the above-entitled action. I have read the foregoing answer and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true.



[sign your name in front of a Notary]

Manuel Martinez

[print your name]

Sworn to before me this

30th day of November, 2023


Notary Public

Omar Luciano
Notary Public, State of New York
Reg. No. 04LU6435950
Qualified in New York County
Commission Expires July 5, 2026