CIVIL COURT OF THE CITY OF NEW YORK

COUNTY OF NEW YORK

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JEFFERY HERMAN, : Index No.: 022090 CV 2002

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*Plaintiff,* : **VERIFIED ANSWER**

:

--against-- :

:

DEBORAH SPITZ, a/k/a DEBBIE SPITZ, a/k/a, :

SUKIE RAY SPITZ, a/k/a SUKIE RAE SPITZ, :

*a/k/a SUKIE RAY, a/k/a SUKIE RAE*  :

:

*Defendant.*  :

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Defendant, by her attorney, Michael C. Barrows, as and for her Answer alleges as follows:

1. Defendant denies the allegations set forth in paragraphs 4, 6, 7, 8, 9, 10, 12, 13, 14, 15, 17, 18, and 19 of the Plaintiff’s Complaint.

2. Defendant denies that he has knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 5 of the Plaintiff’s Complaint.

**AS AND FOR A COUNTERCLAIM**

Defendant, as and for her Counterclaim, respectfully alleges:

1. Beginning in or about February of 2001, Defendant has been harassing Plaintiff, causing Plaintiff to suffer severe emotional distress.

2. This harassment of Defendant has been wantonly and maliciously carried out by Plaintiff in an attempt to cause Defendant to be in fear of her physical and emotional well-being.

3. Plaintiff’s harassment of Defendant has been so egregious as to give rise to an award of punitive damages to the Defendant.

WHEREFORE, as a result of the foregoing, Defendant demands judgment as follows:

A. Dismissing Plaintiff’s Complaint;

B. Awarding compensatory damages to the defendant in the amount of One Million Dollars ($1,000,000.00);

C. Awarding punitive damages in an amount to be determined by the trier of the fact;

D. Awarding Defendant the costs and disbursements of this action.

Yours, etc.

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Michael C. Barrows, Esq.

*Attorney for Defendant*

300 Park Avenue

Suite 1700

New York, NY 10022

(212) 518-7144

To: Gary S. Fish

Attorney for the Plaintiff

15 Maiden Lane - 16th Floor

New York, NY 10038

**VERIFICATION**

STATE OF NEW YORK )

) ss.:

COUNTY OF NEW YORK )

I, DEBORAH SPITZ, being duly sworn, say I am the Defendant in the within action. I have read the foregoing Answer and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

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DEBORA SPITZ

Sworn to before me this

1st day of July, 2002

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NOTARY PUBLIC