

KMD:da (Our File No.: 21-18-010-15E)

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

-----X
MARISSA HOECHSTETTER, JANE DOE #8, JANE
DOE #9, JANE DOE #10, JANE DOE #11, JANE DOE #12,
JANE DOE #13, JANE DOE #14, JANE DOE #15, JANE
DOE #16, JANE DOE #17, JANE DOE #18, JANE DOE #19,
JANE DOE #21, JANE DOE #22, JANE DOE #23, JANE
DOE #26, JANE DOE #27, JANE DOE #28 AND JANE DOE
#30,

Index No.: 161335/2018

**VERIFIED ANSWER TO THE
AMENDED COMPLAINT**

Plaintiffs,

-against-

COLUMBIA UNIVERSITY; THE NEW YORK AND
PRESBYTERIAN HOSPITAL; COLUMBIA
PRESBYTERIAN MEDICAL CENTER; COLUMBIA
UNIVERSITY MEDICAL CENTER; COLUMBIA-
PRESBYTERIAN MEDICAL CENTER, EAST SIDE
ASSOCIATES; EAST SIDE ASSOCIATES; ROBERT
HADDEN; THE TRUSTEES OF COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK; COLUMBIA UNIVERSITY
COLLEGE OF PHYSICIANS AND SURGEONS;
PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES
ORGANIZATIONS, INC.; COLUMBIA-CORNELL CARE,
LLC; COLUMBIA CORNELL NETWORK PHYSICIANS,
INC.; SLOANE HOSPITAL FOR WOMEN,

Defendants.

-----X
Defendant, ROBERT HADDEN, by his attorneys, VASLAS LEPOWSKY HAUSS &
DANKE LLP, as and for his Amended Verified Answer to Plaintiff's Amended Verified
Complaint, respectfully shows to this Court and alleges:

PLAINTIFF MARISSA HOECHSTETTER

1. Denies each and every allegation contained in paragraphs "1", "2", "3", "4", "5",
"6", "7", "9" and "10".

2. Denies each and every allegation contained in paragraph "8" except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #8

3. Denies each and every allegation contained in paragraphs "11", "12", "13", "14", "15", "16", "17", "19" and "20".

4. Denies each and every allegation contained in paragraph "18", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #9

5. Denies each and every allegation contained in paragraphs "21", "22", "23", "24", "25", "26", "28" and "29".

6. Denies each and every allegation contained in paragraph "27", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #10

7. Denies each and every allegation contained in paragraphs "30", "31", "32", "33", "34", "35", "36" and "38".

8. Denies each and every allegation contained in paragraph "37", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #11

9. Denies each and every allegation contained in paragraphs "39", "40", "41", "42" and "43".

JANE DOE #12

10. Denies each and every allegation contained in paragraphs "44", "45", "46", "47", "48", "49", "51" and "52".

11. Denies each and every allegation contained in paragraph "50", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #13

12. Denies each and every allegation contained in paragraphs "53", "54", "55", "56", "57", "58", "60" and "62".

13. Denies each and every allegation contained in paragraph "59", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

14. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "61".

JANE DOE #14

15. Denies each and every allegation contained in paragraphs "63", "64", "65", "66", "67", "68", "69", "70", "71", "72", "74" and "75".

16. Denies each and every allegation contained in paragraph "73", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #15

17. Denies each and every allegation contained in paragraphs "76", "77", "78", "79", "80", "81", "82", "83", "84", "86" and "87".

18. Denies each and every allegation contained in paragraph "85", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #16

19. Denies each and every allegation contained in paragraphs "88", "89", "90", "91", "92", "93", "94", "95", "97" and "98".

20. Denies each and every allegation contained in paragraph "96", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #17

21. Denies each and every allegation contained in paragraphs "99", "100", "101", "102", "103", "104", "105", "106", "108" and "109".

22. Denies each and every allegation contained in paragraph "107", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #18

23. Denies each and every allegation contained in paragraphs "110", "111", "112", "113", "114", "115", "116", "117", "118", "119", "120", "121", "122", "123", "124", "125", "126", "127", "128", "129", "130", "131", "133" and "134".

24. Denies each and every allegation contained in paragraph "132", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #19

25. Denies each and every allegation contained in paragraphs "135", "136", "137", "138", "139", "140", "141", "142", "144", "145" and "146".

26. Denies each and every allegation contained in paragraph "143", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #21

27. Denies each and every allegation contained in paragraphs "147", "148", "149", "150", "151", "152", "153", "155" and "156".

28. Denies each and every allegation contained in paragraph "154", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #22

29. Denies each and every allegation contained in paragraphs "157", "158", "159", "160", "161", "162" and "164".

30. Denies each and every allegation contained in paragraph "163", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #23

31. Denies each and every allegation contained in paragraphs "165", "166", "167", "168", "169", "170", "171", "172", "173", "174", "176" and "177".

32. Denies each and every allegation contained in paragraph "175", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

JANE DOE #26

33. Denies each and every allegation contained in paragraphs "178", "179", "180", "181", "182", "183", "184", "185", "186" and "187".

JANE DOE #27

34. Denies each and every allegation contained in paragraphs "188", "189", "190", "191", "192", "193", "194" and "195".

JANE DOE #28

35. Denies each and every allegation contained in paragraphs "196", "197", "198", "199", "200", "201", "202", "203", "204", "205", "206" and "207".

JANE DOE #30

36. Denies each and every allegation contained in paragraphs "208", "209", "210", "211", "212", "213", "214", "215", "216", "217", "218", "219", "220", "221", "222", "223" and "225".

37. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "224".

DEFENDANT ROBERT HADDEN

38. Denies each and every allegation contained in paragraph "226", except admits that ROBERT HADDEN is an adult male, who lives in the State of New Jersey, received his medical degree from the New York Medical College in 1987 and completed his medical internship and residency in Obstetrics and Gynecology and thereafter practiced as an obstetrician/gynecologist at various facilities.

39. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "229" and all questions of law are reserved for the Court.

40. Denies each and every allegation contained in paragraphs "227", "228", "230" and "231".

DEFENDANTS COLUMBIA UNIVERSITY; THE NEW YORK AND PRESBYTERIAN HOSPITAL; COLUMBIA PRESBYTERIAN MEDICAL CENTER; COLUMBIA UNIVERSITY MEDICAL CENTER; COLUMBIA-PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES; THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK; COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS; PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATIONS, INC.; COLUMBIA-CORNELL CARE, LLC; and COLUMBIA CORNELL NETWORK PHYSICIANS, INC. (CORP. ENTITIES)

41. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "232", "234", "235", "236", "237", "238", "239", "240", "241", "242", "243", "244", "245", "246", "247", "248", "249", "250", "251", "252", "253", "254", "255", "270", "271", "272", "273", "274", "275", "276", "277", "278", "279", "280", "281", "282", "283", "284", "285", "286", "287", "288", "289", "290", "291", "292", "293", "294", "295", "296", "297", "298", "299", "300", "301", "302", "303", "304", "305", "306", "307", "308", "309", "310", "311", "312", "313", "314", "315", "316", "317", "318", "346", "347", "379",

“404”, “424”, “425”, “426”, “427”, “428”, “429”, “430”, “431”, “432”, “433”, “434”, “436”, “437”, “438”, “439”, “440”, “441”, “442”, “443”, “444”, “445”, “446”, “447”, “454”, “455”, “468”, “470”, “471” and “472”.

42. Denies each and every allegation contained in paragraphs “233”, “256”, “322”, “323”, “324”, “325”, “326”, “327”, “328”, “329”, “330”, “331”, “332”, “333”, “334”, “335”, “336”, “337”, “338”, “339”, “340”, “341”, “342”, “343”, “344”, “345”, “348”, “349”, “350”, “351”, “352”, “353”, “354”, “355”, “356”, “357”, “358”, “359”, “360”, “361”, “362”, “363”, “364”, “365”, “366”, “367”, “373”, “374”, “375”, “376”, “377”, “378”, “380”, “381”, “382”, “383”, “384”, “385”, “386”, “387”, “388”, “389”, “390”, “391”, “392”, “393”, “394”, “395”, “405”, “406”, “407”, “408”, “411”, “412”, “413”, “414”, “415”, “416”, “417”, “418”, “419”, “420”, “421”, “422”, “423”, “435”, “448”, “449”, “450”, “451”, “452”, “453”, “456”, “457”, “458”, “459”, “460”, “461”, “462”, “463”, “464”, “465”, “466”, “467”, “469”, “473”, “475”, “476”, “477”, “478” and “479”.

43. Admits the allegations contained in paragraphs “257” and “319”.

44. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “320”, “321”, “368”, “369”, “370”, “371”, “372” and “474” and all questions of law are reserved for the Court.

45. Denies each and every allegation contained in paragraphs “396”, “397”, “398”, “399”, “400”, “401”, “402”, “403”, “409”, “410”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

FACTUAL ALLEGATIONS APPLICABLE TO ALL CLAIMS BY ALL PLAINTIFFS

46. Denies each and every allegation contained in paragraphs “480”, “482”, “483”, “484”, “485”, “486”, “487”, “488”, “489”, “490”, “491”, “492”, “493”, “494”, “495”, “496”, “497”, “498”, “499”, “500”, “501”, “502”, “503” and “504”.

47. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph “481” and all questions of law are reserved for the Court.

STATUTES OF LIMITATIONS ARE TOLLED

48. Denies each and every allegation contained in paragraphs “505”, “506”, “507”, “508”, “509”, “510”, “511”, “512”, “513”, “514”, “515”, “516”, “517”, “519”, “520”, “521” and “522”.

49. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph “518” and all questions of law are reserved for the Court.

**FIRST CAUSE OF ACTION
COMMITTING AND ENABLING GENDER VIOLENCE**

50. Repeats and reiterates each admission or denial heretofore made in response to paragraph “523”.

51. Denies each and every allegation contained in paragraphs “524”, “525”, “526”, “527” and “528”.

**SECOND CAUSE OF ACTION
COMMITTING AND ENABLING SEXUAL HARASSMENT, PREDATORY
GROOMING, SEXUAL EXPLOITATION AND SEXUAL ABUSE**

52. Repeats and reiterates each admission or denial heretofore made in response to paragraph “529”.

53. Denies each and every allegation contained in paragraphs “530”, “531”, “532”, “533”, “534”, “535” and “536”.

THIRD CAUSE OF ACTION
COMMITTING AND ENABLING CRIMINAL and CIVIL SEXUAL BATTERY

54. Repeats and reiterates each admission or denial heretofore made in response to paragraph “537”.

55. Denies each and every allegation contained in paragraphs “538”, “539”, “540”, “541”, “542”, “543”, “544”, “545” and “546”.

FIFTH CAUSE OF ACTION
NEW YORK DECEPTIVE BUSINESS PRACTICES
GENERAL BUSINESS LAW § 349-350

56. Repeats and reiterates each admission or denial heretofore made in response to paragraph “547”.

57. Denies each and every allegation contained in paragraphs “548”, “549”, “550”, “551”, “552”, “553” and “554”.

SIXTH CAUSE OF ACTION
COMMITTING AND ENABLING NEGLIGENT
INFLICTION OF EMOTIONAL DISTRESS

58. Repeats and reiterates each admission or denial heretofore made in response to paragraph “555”.

59. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph “556” and all questions of law are reserved for the Court.

60. Denies each and every allegation contained in paragraphs “557”, “558”, “559”, “560”, “561” and “562”.

SEVENTH CAUSE OF ACTION
COMMITTING AND ENABLING INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS

61. Repeats and reiterates each admission or denial heretofore made in response to paragraph “563”.

62. Denies each and every allegation contained in paragraphs “564”, “565”, “566”, “567”, “568”, “569”, “570” and “571”.

EIGHTH CAUSE OF ACTION
CONSTRUCTIVE FRAUD

63. Repeats and reiterates each admission or denial heretofore made in response to paragraph “572”.

64. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “573” and “574” and all questions of law are reserved for the Court.

65. Denies each and every allegation contained in paragraphs “575”, “576”, “577”, “578”, “579”, “580”, “581”, “582”, “583”, “584”, “585”, “586”, “587”, “588”, “589”, “590”, “591”, “592”, “593”, “594”, “595”, “596”, “597” and “598”.

NINTH CAUSE OF ACTION
COMMITTING AND ENABLING NEGLIGENCE
AND PROFESSIONAL NEGLIGENCE

66. Repeats and reiterates each admission or denial heretofore made in response to paragraph “599”.

67. Denies each and every allegation contained in paragraphs “600”, “603”, “604”, “605”, “606”, “607”, “608”, “609”, “610” and “611”.

68. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “601” and “602” and all questions of law are reserved for the Court.

TENTH CAUSE OF ACTION
NEGLIGENT SUPERVISION

69. Repeats and reiterates each admission or denial heretofore made in response to paragraph "612".

70. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "613" and "614" and all questions of law are reserved for the Court.

71. Denies each and every allegation contained in paragraphs "615", "616", "617", "618", "619", "620", "621", "622", "623" and "624".

ELEVENTH CAUSE OF ACTION
NEGLIGENCE *PER SE* CONDUCT IN VIOLATION OF
MANDATORY NEW YORK STATE REPORTING LAWS

72. Repeats and reiterates each admission or denial heretofore made in response to paragraph "625".

73. Denies each and every allegation contained in paragraphs "627", "628", "629", "630", "632", "633", "634", "635", "636", "637" and "638".

74. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "626" and "631".

TWELFTH CAUSE OF ACTION
NEGLIGENT HIRING, RETENTION and RATIFICATION

75. Repeats and reiterates each admission or denial heretofore made in response to paragraph "639".

76. Denies each and every allegation contained in paragraphs "640", "643", "644", "645", "646", "647", "648", "649", "650", "651", "652", "653", "654", "655", "656", "657", "658", "659", "660", "661" and "662".

77. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "641" and "642".

THIRTEENTH CAUSE OF ACTION
FAILURE TO WARN, TRAIN or EDUCATE

78. Repeats and reiterates each admission or denial heretofore made in response to paragraph "663".

79. Denies each and every allegation contained in paragraphs "664", "665", "666", "667" and "668".

FOURTEENTH CAUSE OF ACTION
GROSS NEGLIGENCE, WANTON, WILLFUL and RECKLESS CONDUCT

80. Repeats and reiterates each admission or denial heretofore made in response to paragraph "669".

81. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "670", "671", "672" and all questions of law are reserved for the Court.

82. Denies each and every allegation contained in paragraphs "673", "674", "675", "676", "677", "678", "679", "680", "681", "682", "683", "684", "685", "686", "687", "688", "689", "690", "691", "692", "693", "694", "695", "696" and "697".

FIFTEENTH CAUSE OF ACTION
INVASION OF PRIVACY UNDER NEW YORK MENTAL HEALTH LAW § 33.13

83. Repeats and reiterates each admission or denial heretofore made in response to paragraph "698".

84. Denies each and every allegation contained in paragraphs "699", "700", "701", "702", "703", "704" and "705".

SIXTEENTH CAUSE OF ACTION
DEFAMATION, LIBEL AND SLANDER

85. Repeats and reiterates each admission or denial heretofore made in response to paragraph "706".

86. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "707", "708", "709", "710", "711", "712", "713", "714", "715" and "716".

87. Denies each and every allegation contained in paragraphs "717" and "718".

SEVENTEENTH CAUSE OF ACTION
REMOVAL OF SEXUAL PREDATOR ROBERT HADDEN'S NAME FROM THE BIRTH CERTIFICATES OF THE CHILDREN WHOSE MOTHERS WERE SEXUALLY ASSAULTED AND ABUSED

88. Repeats and reiterates each admission or denial heretofore made in response to paragraph "719".

89. Denies each and every allegation contained in paragraphs "720", "721", "722", "723", "724", "726", "727", "728", "729", "733", "734", "735", "736" and "738".

90. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "725", "730", "731", "732" and "737".

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

Upon information and belief, that any injury which plaintiffs may have sustained at the time and place set forth in the Complaint herein was caused wholly or in part, or was contributed to by the culpable conduct and negligence of said plaintiffs, and the amount of damages awarded herein, if any, should be denied or diminished in proportion to the amount of said culpable conduct and negligence of said plaintiffs.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

Upon information and belief, any past or future costs or expenses incurred or to be incurred by the plaintiffs for medical care, dental care, custodial care or rehabilitative services, loss of earnings or other economic loss has been or will with reasonable certainty, be paid or indemnified in whole or in part from collateral source as defined in Section 4545 of the New York Civil Practice law.

If any damages are recoverable against said defendant(s), the amount of such damages shall be diminished by the amount of the funds which plaintiffs has or shall receive from collateral source.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

If plaintiffs are entitled to recover damages for loss of earnings or impairment of earning ability as against defendant ROBERT HADDEN by reason of the matters alleged in the Complaint, liability for which is hereby denied, then pursuant to CPLR 4546 the amount of damages recoverable against said defendant, if any, shall be reduced by the amount of federal, state and local income taxes which the plaintiff would have been obligated by law to pay.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

Any claim based upon lack of informed consent is barred by Public Health Law Section 2805-d.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

That one or more causes of action herein may not be maintained (in whole or in part) by virtue of the applicable statutes of limitations.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

That the Court lacks personal jurisdiction over the defendant, ROBERT HADDEN.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

Plaintiff has failed to file and or serve a proper certificate of Merit required by CPLR 3012-

a.

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE

Plaintiff(s) right to recover damages, if any, are barred in whole or in part pursuant to the Patient Protection and Affordable Care Act, 26 USCS Section 500A.

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

That the court lacks jurisdiction over this action in that it was previously removed to the United States District Court for the Southern District of New York.

AS AND FOR A TENTH AFFIRMATIVE DEFENSE

That service of the pleading in this action was not made until after expiration of the time permitted by the CPLR and that accordingly, plaintiffs are barred from a recovery herein.

AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE

That the pleadings served (Supplemental Summons and Amended Verified Complaint), were not amended in a timely manner or by court order and that accordingly plaintiffs are barred from a recovery herein.

PLEASE BE ADVISED, any paragraph of plaintiffs' Complaint not answered is denied.

WHEREFORE, the defendant, **ROBERT HADDEN**, demands judgment dismissing the Complaint of the plaintiffs with the costs, interest and disbursements of this action.

Dated: Staten Island, New York
July 3, 2019

VASLAS LEPOWSKY HAUSS & DANKE LLP
Attorneys for Defendant
ROBERT HADDEN
201 Edward Curry Avenue, Suite 100
Staten Island, NY 10314
(718) 761-9300

By: 
KENNETH M. DALTON

TO: Anthony T. DiPietro, Esq.
Law Office of Anthony T. DiPietro, P.C.
Attorney for Plaintiffs
233 Broadway, Suite 880
New York, NY 10279

Jay A. Rappaport, Esq.
Aaronson Rappaport Feinstein & Deutsch, LLP
Attorney for Defendants
COLUMBIA UNIVERSITY; THE NEW YORK AND PRESBYTERIAN
HOSPITAL; COLUMBIA PRESBYTERIAN MEDICAL CENTER;
COLUMBIA UNIVERSITY MEDICAL CENTER; COLUMBIA-PRESBYTERIAN
MEDICAL CENTER, EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES; THE
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS;
PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC.;
COLUMBIA-CORNELL CARE, LLC; COLUMBIA CORNELL NETWORK
PHYSICIANS, INC.; SLOANE HOSPITAL FOR WOMEN
600 Third Avenue
New York, NY 10016

KMD:da (Our File No. 21-18-010-15E)

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF RICHMOND)

KENNETH M. DALTON, being duly sworn, deposes and says:

That he is a member with the firm of VASLAS LEPOWSKY HAUSS DANKE LLP, attorneys for defendant, **ROBERT HADDEN**, in this action. That he has read the foregoing **ANSWER** and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.


The reason this verification is made by deponent and not by said defendant is that the defendant herein is in a county other than the one in which deponent maintains his office.

The source of deponent's information and the grounds of his belief are communications, papers, reports and investigations contained in the file.



KENNETH M. DALTON

Sworn to before me this
3rd day of July, 2019.



Notary Public

MARIA E. MERINGOLO
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01ME6115852
QUALIFIED IN RICHMOND COUNTY
COMMISSION EXPIRES SEPT. 13, 2020

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF RICHMOND)

DEBORAH AGOSTINI, being duly sworn deposes and says: I am not a party to the action, am over 18 years of age and reside at Staten Island, New York.

On July 3, 2019, I served a true copy of the annexed **VERIFIED ANSWER TO THE AMENDED COMPLAINT** via e-filing through the NYSCEF website and by mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address or the address(s) as indicated below:


Anthony T. DiPietro, Esq.
Attorney for Plaintiffs
The Woolworth Building
233 Broadway – Suite 880
New York, NY 10279

Jay A. Rappaport, Esq.
Aaronson Rappaport Feinstein Deutsch, LLP
Attorneys for Defendants
The Trustees of Columbia University in the City of New York
and The New York Presbyterian Hospital
600 Third Avenue
New York, NY 10016



DEBORAH AGOSTINI

Sworn to before me this
3rd day of July 2019.



Notary Public

MARIA E. MERINGOLO
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01ME6115852
QUALIFIED IN RICHMOND COUNTY
COMMISSION EXPIRES SEPT. 13, 2020