

# **EXHIBIT D**

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF KINGS: HOUSING PART S

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JUDITH GRUNBAUM,

L&T Index No. 62816/16

Petitioner-landlord,

-against-

ANSWER

HEIDI FRITZIE BUMBY CHUA,

Respondent-tenant,  
70 South Elliot Place  
Apt. 3<sup>rd</sup> Floor Front with Alcove  
Brooklyn, NY 11217

-and-

SHRUTI PAREKH (a/k/a "JANE DOE"),

Respondents-undertenants.  
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PLEASE TAKE NOTICE, that the Respondent SHRUTI PAREKH hereby interposes the following Answer to the Petition herein:

1. Respondent lacks sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 1 of the Petition.
2. Respondent's counsel lacks sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 2 of the Petition.
3. Respondent denies the allegations set forth in paragraph 3 of the Petition.
4. Respondent admits the allegations set forth in paragraph 4 of the Petition.
5. Respondent admits the allegations set forth in paragraph 5 of the Petition.
6. Respondent admits the allegations set forth in paragraph 6 of the Petition.
7. Respondent lacks sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 7 of the Petition, except to admit that the premises are rent

stabilized.

8. Respondent lacks sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 8 of the Petition, except to admit that the premises are a multiple dwelling.

9. Respondent lacks sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 9 of the Petition.

10. Respondent denies the allegations set forth in paragraph 10 of the petition.

**AS AND FOR A FIRST DEFENSE: LACK OF GOOD FAITH**

11. The good faith requirement embodied in Rent Stabilization Code § 2524.4(a) and enforced by the case law is met only when an owner seeks to gain possession with the honest or genuine intention to recover the tenant's premises for personal and/or family use.

12. Upon information and belief, Petitioner lacks any good faith basis of using the subject premises as the primary residence of herself, her four adult children, and her thirty grandchildren and great-grandchildren.

13. Accordingly, the Court should dismiss the Petition and grant attorney's fees pursuant to R.P.L. § 234.

WHEREFORE, Respondent respectfully requests that this Court issue an Order:

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- 1) Dismissing the petition with prejudice;
  - 2) Granting Respondent reasonable costs, disbursements, and attorney's fees;

Dated: June 13, 2016  
Brooklyn, New York



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Pavita Krishnaswamy  
Nisha D. Vora  
BROOKLYN LEGAL SERVICES  
105 Court Street, 4<sup>th</sup> Floor  
Brooklyn, NY 11201  
(718) 246-3269/ (718) 237-5550  
Attorneys for Respondent

TO:

SIDRANE & SCHWARTZ-SIDRAINE, LLP  
119 No. Park Avenue, Suite 201  
Rockville Centre, New York 11570  
*Attorneys for Petitioner*  
(516) 569-9539

NYSCEF DOC. NO. COURT OF THE CITY OF NEW YORK  
COUNTY OF KINGS: HOUSING PART S

RECEIVED NYSCEF: 09/30/2020

-----X  
JUDITH GRUNBAUM,

**L&T Index No. 62816/16**

Petitioner-landlord,

**AFFIRMATION OF SERVICE**

-against-

HEIDI FRITZIE BUMBY CHUA,  
Respondent-tenant,  
-and-


SHRUTI PAREKH (a/k/a "JANE DOE"),  
Respondents-undertenants.

-----X

NISHA D. VORA, an attorney duly admitted to the practice before the courts of the State of New York, affirms the truth of the following statements under the penalties of perjury:

- 1) I am a staff attorney at South Brooklyn Legal Services located at 105 Court Street, Brooklyn New York 11201, attorneys for Respondent SHRUTI PAREKH.
- 2) I am over the age of 18 and am not a party to this proceeding.
- 3) On June 13, 2016, I served the within Answer upon SIDRANE & SCHWARTZ-SIDRAINE, LLP, attorney for the Petitioner herein, by causing to be deposited true copies of same in a letter box under the exclusive control of the United States Postal Service, enclosed in a sealed postpaid wrapper addressed to said attorneys at the following address: 119 No. Park Avenue, Suite 201, Rockville Centre, New York 11570.

DATED: June 13, 2016  
Brooklyn, New York

  
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NISHA D. VORA, ESQ.

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF KINGS: HOUSING PART S

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JUDITH GRUNBAUM,  
Petitioner,

against

SHRUTI PAREKH  
Respondent.

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**ANSWER**

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Signature (Rule 130-1.1-a)



NISHA D. VORA, ESQ.

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**BROOKLYN LEGAL SERVICES, INC.**

*Pavita Krishnaswamy, Esq.*  
*Nisha D. Vora, Esq.*  
*Attorneys for Respondent*

*Office and Post Office Address, Telephone*  
**105 COURT STREET, 4TH FLOOR**  
**BROOKLYN, NY 11201**  
**Telephone (718) 237-5500**

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To:

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Service of a copy of the within is hereby admitted.

Dated:

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Attorney(s) for