

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

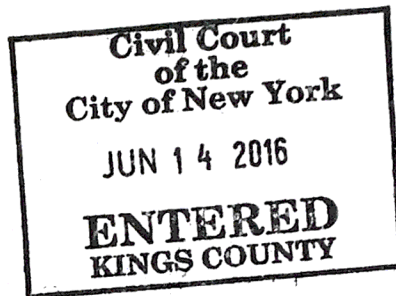
HEIDI FRITZIE BUMBY CHUA,

Respondent-tenant,
70 South Elliot Place
Apt. 3rd 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



Pavita Krishnaswamy
Nisha D. Vora
BROOKLYN LEGAL SERVICES
105 Court Street, 4th 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. 001
COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS: HOUSING PART S

RECEIVED NYSCEF: 09/30/2020

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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



NISHA D. VORA, ESQ.

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

JUDITH GRUNBAUM,
Petitioner,

against

SHRUTI PAREKH
Respondent.

ANSWER

Signature (Rule 130-1.1-a)



NISHA D. VORA, ESQ.

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

To:

Service of a copy of the within is hereby admitted.

Dated:

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Attorney(s) for