

Index No. 034577 Year 2020 RJ No. Hon. Paul I. Marx, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

EMMIS RADIO, LLC D/B/A HOT97,

Plaintiff(s)

-against-

WILLIAM BENSON GROUP, LLC D/B/A  
BILLIONAIRES ROW, AND D/B/A  
BILLIONAIRES ROW CHAMPAGNE, AND  
D/B/A BILLIONAIRES ROW, LLC,

Defendant(s)

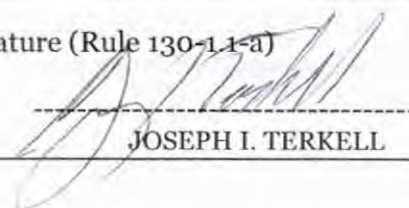
PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST DEMAND FOR  
DISCOVERY & INSPECTION OF DOCUMENTS

**THE TERKELL LAW FIRM, P.C.**

*Attorneys for Plaintiff*  
19 BENDER ROAD  
NEW CITY, NY 10956  
845-517-0670

Signature (Rule 130-1.1-a)

Attorney(s) for Plaintiff



JOSEPH I. TERKELL

Please take notice

Notice of Entry

That the within is a (certified) true copy of an Order  
duly entered in the office of the clerk of the within named court on , 2021.

Notice of Settlement

than an order of which the within is a true copy will be presented for  
settlement to the one of the judges  
of the within named court, at on A.M

Dated,  
August 24, 2021

Yours, etc.  
**TERKELL LAW FIRM, P.C.**  
Attorneys for Plaintiff  
19 Bender Road  
New City, NY 10956

STATE OF NEW YORK, COUNTY OF \_\_\_\_\_ ss.:  
I, the undersigned, an attorney admitted to practice in the courts of New York State,

- Certification by attorney** certify that the within has been compared by me with the original and found to be a true and complete copy.
- Attorney's Affirmation** state that I am the attorney(s) of record for \_\_\_\_\_ in the within action; I have read the foregoing \_\_\_\_\_ and know the contents thereof; the same is true to my own knowledge, except as to the matters herein alleged to be on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by \_\_\_\_\_

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:  
I affirm the following statements are true, under the penalties of perjury. \_\_\_\_\_  
The name signed must be printed beneath

Dated:

STATE OF NEW YORK, COUNTY OF \_\_\_\_\_ ss.:  
I, the undersigned, being duly sworn, depose and say: I am

- Individual Verification** in the action; I have the foregoing \_\_\_\_\_ 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.
- Corporate Verification** the \_\_\_\_\_ of \_\_\_\_\_ a \_\_\_\_\_ corporation and a party in the within action; I have the foregoing \_\_\_\_\_ and know the contents thereof, and the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe it to be true. This verification is made by me because the above party is a corporation and I am an officer thereof.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

Sworn to before me on \_\_\_\_\_  
\_\_\_\_\_ the named signed must be printed underneath

STATE OF NEW YORK, COUNTY OF ROCKLAND ss.:  
I, Robin Wynn, the undersigned, being sworn, say: I am not a party to the action, am over 18 years of age and reside at NEW CITY, NEW YORK

On August 23, 2021, I served the within To Defendant's First Demand For Discovery & Inspection Of Documents


**Service by Electronic Means** }by transmitting a copy to the following persons by  **E-FILING via NYSCEF**

On August 24, 2021, I served the within Plaintiff's Response To Defendant's First Demand For Discovery & Inspection Of Documents

**Service by Mail** }by mailing a copy to each of the following persons at the last known address set forth after each name below:

TO: David C. Van Leeuwen, Esq.  
Peyrot & Associates, PC  
62 William Street, 8th Floor  
New York, NY 10005

Sworn to before me on August 24, 2021

  
ROBIN WYNN

  
**JOSEPH I. TERKELL**  
Notary Public, State of New York  
No. 4753512  
Qualified in Rockland County  
Commission Expires March 30, 2023