(518) 725-9717 Fax (518) 725-1910



## ABDELLA & SISE, LLP Attorneys at Law

8 West Fulton Street P. O. Box 673 Gloversville, New York 12078

STATE OF N	NEW YORK	
SUPREME C	COURT: COUNTY	OF FULTON

BALBOAA LAND DEVELOPMENT CORPORATION,

Index No.: 07599

Plaintiff,

VERIFIED REPLY TO COUNTERCLAIM

VS.

TOWN OF CAROGA,

Defendant.

Plaintiff, BALBOAA LAND DEVELOPMENT CORPORATION, by and through its attorney, ABDELLA & SISE, LLP, Robert Abdella, Esq., as and for its Reply to Counterclaim states as follows:

- 1. That the plaintiff denies that it has any knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraphs marked and numbered "2", "3", "5", and "7" of the defendant's Counterclaim.
- 2. That the plaintiff admits to the allegations set forth in the paragraphs marked and numbered "1", "4", and "12" of the defendant's Counterclaim.
- 3. That the plaintiff denies the allegations set forth in the paragraphs marked and designated "6", "8", "9" and "10" of the defendant's Counterclaim.

Dated: August 27, 2019

ROBERT ABDELLA, ESQ. ABDELLA & SISE, LLP

8 W. Fulton Street, PO Box 673

Gloversville, NY 12078

Tel: (518) 725-9717

TO: Gregory T. Dunn, Esq.
Attorney for Defendant
59 West Grand Street
Palatine Bridge, NY 13428

## INVIDIDUAL VERIFICATION:

STATE OF NEW YORK )
COUNTY OF FULTON )ss:

I, GEORGE ABDELLA, as President and sole shareholder of Balboaa Land Development Corporation, being duly sworn, deposes and says that I am the plaintiff in the within action; that I have read the foregoing Reply to Counterclaim and know the contents thereof, that the same is true to my knowledge, except as to the matters therein alleged on information and belief, and that a to those matters, I believe them to be true.

GEORGE ABDELLA

Sworn to before me this And day of August, 2019

Notary Public

SUSAN G. FRASIER

Notary Public, State of New York

No. 01FR6006421

Qualified in Fulton County
Commission Expires May 4, 2010

REQUEST FOR JUDICIAL INTERVENTION  UCS-840 (7/2012)				Fo	r Court Clerk	Strategic and Proceedings of the Control of the Con
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-against-			Plaintiff(s)/Petitioner(s)	<u> </u>		
TOWN OF CAROC	Α.					
TOWN OF CAROG	A					
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TORTS O Asbestos			O Other Commercial:_		(specify)	
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O Other Profession	al Malpractice:	(specify)	condominium, comp			
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STATUS OF AC	TION OR PROCE	EDING: Answer YES o	ir NO for EVERY question A	ND enter addition	(specify) and information whe	ere indicated
		YE	S NO			
	complaint or summon complaint or summon			ed: 07/26/2019		
	ing being filed post-jud		<ul><li>If yes, date serve</li><li>If yes, judgment</li></ul>			

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		Abdella & Sise,LLP					O1E3	
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(Lancarina)	Petitioner	8 W. Fulton St., PO Box Street Addres		versville City	State	12078 Zip	_	
	Secondary Role (If any):	1	•	•		Zip	ONO	
		+1 (518) 725-9717 Phone	Fax	susan@	abdellasise.com e-mail			
	Town of Caroga	Dunn		Gregory				
	Last Name		st Name		First Name		OYES	
П	First Name	Dunn & Dunn, PLLC	Firm N	Name				
	Primary Role:	59 West Main St.		ajoharie	New York	13317		
	Defendant	Street Address		City	State	Zlp	Ono	
	Secondary Role (if any):	+1 (518) 673-2330		greg@c	funnlex.com			
		Phone	Phone Fax e-mail			1		
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Robert Abdella  ATTORNEY REGISTRATION NUMBER  PRINT OR TYPE NAME								

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Print Form