KRP: Iw 5167 ANS18 01-30272

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

RALPH PRESS, as Administrator of the Estate of PHYLLIS PRESS, Deceased,

Plaintiff,

VERIFIED ANSWER

1 1 ...

-against-

LILA G. HOLLIN, as Executrix of the Estate of SIDNEY HOLLIN, M.D., Deceased,

Defendant.

-----X

Defendant LILA G. HOLLIN, as Executrix of the Estate of SIDNEY HOLLIN, M.D., Deceased, by her attorneys, MARTIN, CLEARWATER & BELL, answers the plaintiff's complaint as follows, upon information and belief:

AS TO THE FIRST CAUSE OF ACTION

- Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraph of the complaint designated "1".
- 2. Denies each and every allegation contained in the paragraph of the complaint designated "4", except admits that decedent SIDNEY HOLLIN, M.D. rendered certain professional services to and for plaintiff's decedent in accordance with acceptable medical standards of due care.
- 3. Denies each and every allegation contained in the paragraph of the complaint designated "5".
- 4. Denies each and every allegation contained in the paragraph of the complaint designated "6".

AS AND FOR A, SEPARATE AND COMPLETE DEFENSE TO THE CAUSE OR CAUSES OF ACTION, IF ANY, IN THE COMPLAINT OF THE PLAINTIFF, DEFENDANT HOLLIN ALLEGES:

5. Upon information and belief, that the alleged cause or causes of action, if any, on behalf of the plaintiff's decedent stated in the complaint are barred by the applicable statute of limitations.

WHEREFORE, defendant HOLLIN demands judgment dismissing the complaint herein, together with the costs and disbursements of this action.

Dated: New York, New York September 10, 1985

Yours, etc.,

MARTIN, CLEARWATER & BELL Attorneys for Defendant LILA G. HOLLIN, as Executrix of the Estate of SIDNEY HOLLIN, M.D., Deceased 220 East 42nd Street New York, New York 10017 (212) 697-3122

TO: FRIEDMAN & EISENSTEIN
Attorneys for Plaintiff
325 Broadway
New York, New York 10007