

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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ALBANI TORRES FIGUEROA,
Plaintiff,

Index No. 801689/2023E

-against-

DELUXE HOME BUILDERS CORP., CENTRE
POINTE DEVELOPERS LLC, THE BOARD MANAGERS
OF THE WESTCHESTER PLACE CONDOMINIUM, and
ALLSTATE VENTURES, LLC,
Defendants.

**VERIFIED ANSWER TO
SKYVIEW INSTALLATION
SERVICES INC.'S
COUNTERCLAIMS**

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DELUXE HOME BUILDERS CORP., CENTRE
POINTE DEVELOPERS LLC, and ALLSTATE
VENTURES LLC,
Third-Party Plaintiffs,

-against-

SKYVIEW INSTALLATION SERVICES INC., DURA-
VATOR, LLC, SMARTRISE ENGINEERING, INC.,
and TORIN DRIVE NORTH AMERICA,
Third-Party Defendants.

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Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE
POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, by and through their attorneys,
KAUFMAN BORGEEEST & RYAN LLP, as and for their Verified Answer to Third-Party Defendant
SKYVIEW INSTALLATION SERVICES INC.'s counterclaims, states and alleges upon
information and belief the following:

AS AND FOR A RESPONSE TO THE FIRST COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE
POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and
every allegation contained in the paragraph designated as "42" of the Verified Answer to Amended
Verified Third-Party Complaint and respectfully refer all questions of law to the Court.

AS AND FOR A RESPONSE TO THE SECOND COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE
POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and

every allegation contained in the paragraph designated as “43” of the Verified Answer to Verified Amended Third-Party Complaint and respectfully refer all questions of law to the Court.

AS AND FOR A RESPONSE TO THE THIRD COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and every allegation contained in the paragraph designated as “44” of the Verified Answer to Verified Amended Third-Party Complaint and respectfully refer all questions of law to the Court.

AS AND FOR A RESPONSE TO THE FOURTH COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and every allegation contained in the paragraph designated as “45” of the Verified Answer to Verified Amended Third-Party Complaint and respectfully refer all questions of law to the Court.

AS AND FOR A RESPONSE TO THE FIFTH COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and every allegation contained in the paragraph designated as “46” of the Verified Answer to Verified Amended Third-Party Complaint and respectfully refer all questions of law to the Court.

AS AND FOR A RESPONSE TO THE SIXTH COUNTERCLAIM

Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC**, deny the truth of each and every allegation contained in the paragraphs designated as “47” and “48” of the Verified Answer to Verified Amended Third-Party Complaint and respectfully refer all questions of law to the Court.

WHEREFORE, Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP., CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC** demand judgment dismissing the counterclaims raised by **SKYVIEW INSTALLATION SERVICES INC.** together with the costs and disbursements of this action.

Dated: Valhalla, New York
November 16, 2023

Yours, etc.

KAUFMAN BORGEEST & RYAN LLP



BY: Katerina R. Sperl Esq.
Attorneys for Defendants/Third-Party Plaintiffs
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VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF WESTCHESTER)

KATERINA R. SPERL, ESQ., being duly sworn, states that she is associated with the law firm of **KAUFMAN BORGEEST & RYAN LLP**, attorneys for Defendants/Third-Party Plaintiffs, **DELUXE HOME BUILDERS CORP.**, **CENTRE POINTE DEVELOPERS LLC**, and **ALLSTATE VENTURES LLC** in this action and that the foregoing **VERIFIED ANSWER TO SKYVIEW INSTALLATION SERVICES INC.'S COUNTERCLAIMS**, is true to her knowledge, except as to those matters therein stated upon information and belief, and as to those matters she believes them to be true; that the grounds of her belief as to all matters not stated upon her knowledge are correspondence and other writings furnished by the defendants and other documentations maintained in the office of their attorneys; and that the reason why this verification is not made by defendants is that the defendants are located in different County other than the County where their attorneys have their place of business.

Dated: Valhalla, New York
November 16, 2023



KATERINA R. SPERL, ESQ.