

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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DELORIS BRADSHAW

Index No.: 811882/2022E

Plaintiff,

**VERIFIED ANSWER TO
AMENDED COMPLAINT**

-against-

ODAI MENWER AL HAJEH, VENTURE LEASING,
LLC, CB LIVERY LEASING, LLC, UBER
TECHNOLOGIES, INC., UBER USA, LLC, RASIER-
NY, LLC, ELF-NY LLC, and LYFT, INC.,

Defendants.

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Defendants, **VENTURE LEASING, LLC and CB LIVERY LEASING, LLC**, by and through their attorneys, Miller, Leiby & Associates, P.C., as and for their Answer to the Amended Complaint of plaintiff DELORIS BRADSHAW, dated April 26, 2023, set forth upon information and belief as follows:

AS AND FOR THE FIRST ALLEGED CAUSE OF ACTION

1. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "1" of the Amended Complaint.
2. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "2" of the Amended Complaint.
3. Admit the allegations contained in paragraph "3" of the Amended Complaint.
4. Admit the allegations contained in paragraph "4" of the Amended Complaint.
5. Deny the allegations contained in paragraph "5" of the Amended Complaint.
6. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "6" of the Amended Complaint.
7. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "7" of the Amended Complaint.

8. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "8" of the Amended Complaint.

9. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "9" of the Amended Complaint.

10. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the Amended Complaint.

11. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "11" of the Amended Complaint.

12. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "12" of the Amended Complaint.

13. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "13" of the Amended Complaint.

14. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "14" of the Amended Complaint.

15. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "15" of the Amended Complaint.

16. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "16" of the Amended Complaint.

17. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "17" of the Amended Complaint.

18. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "18" of the Amended Complaint.

19. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "19" of the Amended Complaint.

20. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "20" of the Amended Complaint.

21. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "21" of the Amended Complaint.

22. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "22" of the Amended Complaint.

23. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “23” of the Amended Complaint.

24. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “24” of the Amended Complaint.

25. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “25” of the Amended Complaint.

26. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “26” of the Amended Complaint.

27. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “27” of the Amended Complaint.

28. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “28” of the Amended Complaint.

29. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “29” of the Amended Complaint.

30. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “30” of the Amended Complaint.

31. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “31” of the Amended Complaint.

32. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “32” of the Amended Complaint.

33. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “33” of the Amended Complaint.

34. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “34” of the Amended Complaint.

35. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “35” of the Amended Complaint.

36. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “36” of the Amended Complaint.

37. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “37” of the Amended Complaint.

38. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “38” of the Amended Complaint.

39. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “39” of the Amended Complaint.

40. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “40” of the Amended Complaint.

41. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “41” of the Amended Complaint.

42. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “42” of the Amended Complaint.

43. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “43” of the Amended Complaint.

44. Paragraph “44” does not require a response.

45. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “45” of the Amended Complaint.

46. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “46” of the Amended Complaint.

47. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “47” of the Amended Complaint.

48. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “48” of the Amended Complaint.

49. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “49” of the Amended Complaint.

50. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “50” of the Amended Complaint.

51. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “51” of the Amended Complaint.

52. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “52” of the Amended Complaint.

53. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “53” of the Amended Complaint.

54. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “54” of the Amended Complaint.

55. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “55” of the Amended Complaint.

56. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “56” of the Amended Complaint.

57. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “57” of the Amended Complaint.

58. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “58” of the Amended Complaint.

59. Deny the allegations contained in paragraph “59” of the Amended Complaint.

60. Deny the allegations contained in paragraph “60” of the Amended Complaint.

61. Deny the allegations contained in paragraph “61” of the Amended Complaint.

62. Deny the allegations contained in paragraph “62” of the Amended Complaint.

63. Deny the allegations contained in paragraph “63” of the Amended Complaint.

64. Deny the allegations contained in paragraph “64” of the Amended Complaint.

65. Admit the allegations contained in paragraph “65” of the Amended Complaint.

66. Deny the allegations contained in paragraph “66” of the Amended Complaint.

67. Deny in the form alleged the allegations contained in paragraph “67” of the Amended Complaint.

68. Deny in the form alleged the allegations contained in paragraph “68” of the Amended Complaint.

69. Deny the allegations contained in paragraph “69” of the Amended Complaint.

70. Deny the allegations contained in paragraph “70” of the Amended Complaint.

71. Deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph “71” of the Amended Complaint.

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