

STATE OF NEW YORK
SUPREME COURT: COUNTY OF GREENE

Index No.
Date Purchased:

JAMES SCANNAPIECO and KEVIN FERRI,

Plaintiff(s) designates
Greene County as the place of trial

Plaintiff(s),

Basis of the venue is residence of plaintiff

-against-

SUMMONS

MICHELLE A. DESTEFANO,

Plaintiff(s) reside at
3111 Old Kings Road
Catskill , New York 12414

Defendant(s).

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: January 3, 2022
Kingston, New York

ELI B. BASCH, ESQ.
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Attorneys for Plaintiff(s)
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P.O. Box 4235
Kingston, New York 12402
Tel: (845) 338-8884

Defendant's address:
2486 Old Kings Road, Catskill, New York 12414

BASCH & KEEGAN, LLP, 307 CLINTON AVENUE, P.O. BOX 4235, KINGSTON, N.Y. 12402

STATE OF NEW YORK
SUPREME COURT: COUNTY OF GREENE

JAMES SCANNAPIECO and KEVIN FERRI,
Plaintiffs,

-against-

MICHELLE A. DESTEFANO,
Defendant.

COMPLAINT

Plaintiffs, JAMES SCANNAPIECO and KEVIN FERRI, as and for their complaint, complaining of the defendant, MICHELLE A. DESTEFANO, do hereby respectfully allege and show to the Court the following:

AS AND FOR A FIRST CAUSE OF ACTION

FIRST: That at all times hereinafter alleged, the plaintiff, James Scannapieco, resided at 3111 Old Kings Road, Catskill, New York, 12414.

SECOND: That at all times hereinafter alleged, the plaintiff, Kevin Ferri, resided at 3109 Old Kings Road, Catskill, New York, 12414.

THIRD: That at all times hereinafter alleged, the defendant, Michelle A. DeStefano, resided at 2486 Old Kings Road, Catskill, New York.

FOURTH: That heretofore and on or about August 27, 2021, a Friday, at about 2:20 p.m., Old Kings Road in the Town of Catskill, County of Greene, State of New York, 100 feet north of Spruce Lane, was and still is a public thoroughfare.

FIFTH: That at the aforesaid time and place, the plaintiff, James Scannapieco, was operating a certain 2014 Ford bearing New York State registration plate number JBU7439 for the then current period of registration.

SIXTH: That the defendant, Michelle A. DeStefano, was operating a certain 2014 Ford, bearing New York State registration plate number CGG5232 for the then current

period of registration.

SEVENTH: That the defendant, Michelle A. DeStefano, did negligently drive her vehicle into the rear of the plaintiff's vehicle, causing a motor vehicle collision at the aforesaid time and place.

EIGHTH: That the defendant, Michelle A. DeStefano, was negligent in the use and operation of her vehicle at the aforesaid time and place in causing the collision.

NINTH: That the plaintiff, James Scannapieco, sustained a serious injury as defined by the Insurance Law of the State of New York.

TENTH: That the injury and damage sustained by James Scannapieco exceeds the jurisdictional limits of this or any other court.

AS AND FOR A SECOND
CAUSE OF ACTION

ELEVENTH: That the plaintiffs repeat, reiterate and reallege each and every allegation of the within complaint from paragraph "First" through "Tenth" inclusive with the same force and effect as if hereinagain realleged at length.

TWELFTH: That at all times hereinafter alleged, Kevin Ferri was a passenger in the vehicle being operated to James Scannapieco.

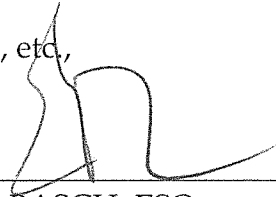
THIRTEENTH: That by reason of the foregoing premises, and by reason of the negligence of the defendant, the plaintiff, Kevin Ferri, sustained a serious injury as defined by the Insurance Law of the State of New York.

FOURTEENTH: That by reason of the foregoing premises, the injury and damage sustained by the plaintiff, Kevin Ferri, exceeds the jurisdictional limits of this or any other court.

WHEREFORE, plaintiffs demand judgment against the defendant in an amount that exceeds the jurisdictional limits of this or any other Court on the first and second causes of action, together with the costs and disbursements of this action, reasonable attorney's fees or as the law shall provide at the time of rendition of the verdict.

Dated: January 3, 2022
Kingston, New York

Yours, etc,



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