

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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MYRTLE CREVELLE and CLYDENE MEDAS,

Plaintiffs,

- against -

APPLE-METRO INC. d/b/a APPLEBEE'S,

Defendant.

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**DEFENDANT'S RESPONSE
TO PRELIMINARY
CONFERENCE ORDER**

Index No. 500609/2017
IAS Part

Defendant Apple-Metro, Inc. d/b/a Applebee's, by Pillinger Miller Tarallo, LLP, in compliance with the preliminary conference order dated June 14, 2017, hereby sets forth the following:

1. **Witnesses:** The responding defendant is unaware of any witnesses to the occurrence, other than the names set forth in the accident report.
2. **Party Statements:** Please see annexed hereto as Exhibit "A".
3. **Insurance Coverage:** At the time of the occurrence, the defendant was covered under Policy #ICC-CL-0010271-5, with a per occurrence limit of \$1,000,000. A copy of the aforementioned policy of insurance will be provided under separate cover.
4. **Photographs, Audiotapes, Slided, Videotapes and Motion Pictures:** At this time the defendant is not in possession of any such documents called for in this demand.

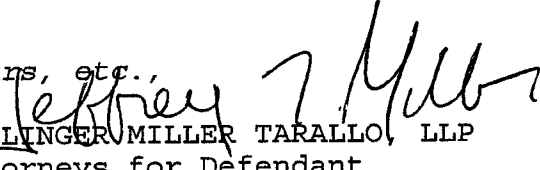
5. Accident Reports: Attached hereto as Exhibit "A" is a copy of the accident report.

6. Expert Witness: At the present time, the defendant has not retained an expert to testify at the trial of this matter. However, defendant reserves the right to supplement this response if and when an expert is retained.

This defendant reserves the right to amend and/or supplement this response should additional information become available.

Dated: Westchester, New York
July 25, 2017

Yours, etc.,


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