

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
LANCE SINGH,

Plaintiff(s),

-against-

YANTI GREEN and DAVID APPLE,

Defendant.  
-----X

**RESPONSE TO  
PRELIMINARY  
CONFERENCE ORDER**

Index No.514526/2019

Defendant(s), YANTI GREEN and DAVID APPLE, by their attorneys, **McDONNELL ADELS & KLESTZICK, PLLC**, in response to the Preliminary Conference Order of the Honorable Justice Carl Landicino, dated, October 4, 2019 allege the following upon information and belief:

**WITNESSES**

Aside from the drivers and passengers in each of the vehicles involved in the accident, the defendants know of no witnesses to the alleged accident.

**STATEMENTS**

The responding defendants are not in possession of any statements.

**PHOTOGRAPHS**

The responding defendants are not in possession of any photographs of the scene or vehicles.

**INSURANCE**

On the date of the alleged occurrence, the responding defendants had the benefit of a policy of insurance with USAA Casualty Insurance Company (USAA) with maximum liability limits of \$300,000/500,000.

Upon information and belief at the time of the alleged accident, Defendant David Apple, had an excess or umbrella policy with PURE Insurance in the amount of \$5,000,000.00

**EXPERT WITNESSES**

The defendants have not yet retained the services of an expert in reference to this matter. Upon retention of an expert, a supplemental response shall be forwarded.

**ACCIDENT REPORTS**

The defendants are not in possession of any accident reports prepared in the ordinary course

of business.

Defendant(s), YANTI GREEN and DAVID APPLE, reserve their rights to amend and/or supplement the above response should further or different information becomes available.

Dated: Garden City, New York  
October 10, 2019

Yours, etc.,

McDONNELL ADELS & KLESTZICK, PLLC



PAMELA GOULD KIPNIS, ESQ.

*Attorneys for Defendants*

401 Franklin Avenue

Garden City, New York 11530

Tele No.: (516) 328-3500

Our File No.: USAA-7372bi

TO: THE JOHNSON LAW FIRM  
*Attorney for Plaintiff*  
9118 Third Avenue  
Brooklyn, New York 11209

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

Gloria Leacock, being duly sworn, deposes and says:

That deponent is not a party to this action, is over 18 years of age and resides in Hackensack, New Jersey.

That on October 15, 2019 deponent served the within **RESPONSE TO PRELIMINARY CONFERENCE ORDER**, on the attorneys at the address(es) listed below by depositing a true copy of same, enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.

TO: THE JOHNSON LAW OFFICE, P.C.  
*Attorney for Plaintiff*  
9118 Third Avenue  
Brooklyn, New York 11209

*Gloria Leacock*  
\_\_\_\_\_  
Gloria Leacock  
USAA-7372bi

Sworn to before me this  
15<sup>th</sup> day of October 2019

*[Signature]*  
\_\_\_\_\_  
NOTARY PUBLIC

**LISA GREEN**  
Notary Public – State of New York  
No. 01GR5055395  
Certified in Nassau County  
My Commission Expires February 5, 2022

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS  
Index No.: 514526/19

LANCE SINGH

Plaintiff,

-against-

YANTO GREENE and DAVID APPLE

Defendant(s).

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**RESPONSE TO PRELIMINARY CONFERENCE ORDER**

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**McDONNELL ADELS & KLESTZICK, PLLC**  
Attorneys at Law  
Attorneys for Defendant, Nicole Taylor  
Post Office Address and Telephone  
401 Franklin Avenue  
Garden City, NY 11530  
(516) 328-3500

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**CERTIFICATION PURSUANT TO 22 N.Y.C.R.R. §130-1.1a**

PAMELA GOULD KIPNIS, ESQ. hereby certifies that, pursuant to 22 N.Y.C.R.R. §130-1.1a, the foregoing **RESPONSE TO PRELIMINARY CONFERENCE ORDER**, are not frivolous nor frivolously presented.

*PAMELA GOULD KIPNIS*

\_\_\_\_\_  
PAMELA GOULD KIPNIS, ESQ.

Dated: Garden City, New York  
October 10, 2019

Service of a copy of the within ^ is hereby admitted  
Dated,

.....  
Attorney(s) for ^

Please take notice

Notice of entry that the within is a (*certified*) true copy of duly entered in the office of the clerk of the within named court on  
 Notice of Settlement that an order ^ of which the within is a true copy will be presented for settlement to the HON. one of the judges of the within named court, at \_\_\_\_\_ on \_\_\_\_\_

Yours, etc.

**McDONNELL ADELS & KLESTZICK, PLLC**  
Attorneys at Law  
Attorneys for Defendant, Nicole Taylor  
Post Office Address  
401 Franklin Avenue  
Garden City, NY 11530  
(516) 328-3500