

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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APPLE AND HONEY, LLC d/b/a HMH IRON :
DESIGN LLC, :

Index No.

Plaintiff,

Date Filed:

-against-

SUMMONS

71 SMITH STREET PROPERTY OWNER, L.L.C., :
THE BOERUM - CONDOMINIUM RESIDENCES, :
LETTIRE CONSTRUCTION CORP., FIDELITY & :
DEPOSIT COMPANY OF MARYLAND, 140 :
SCHERMERHORN STREET PROPERTY OWNER :
LLC, SOUZA LLC, MEAR HOLDINGS LLC, :
MSMA LLC, BLUESPADE LLC, LOKE TWIN :
CORPORATION, EDGE ASSOCIATES LLC, :
MERLION REALTY LLC, CM BROTHERS LLC, :
DEERAH LLC, SK BOERUM LLC, PINEAPPLE 8 :
LLC, SKY R. REALTY LLC, BROOKLYNTH :
LLC, YELLOW HOUSE TOO LLC, TAL M. :
CHITAYAT, RYAN SCHLEIS, KAK R. KIM, I :
HSIN CHUANG, KARAN SONI, CHENG YUN :
LIU, ZE' -EV D. EIGER, THOMAS TON, GERARD :
DRUMM, DAVID M. PETERSON, ELIZABETH :
RENNIE, KEVIN CHING, BLAKE NUCCI, :
LELAND RICHARDS, RACHEL E. HORLICK, :
MARVIN ZAGULI, PUNIT SHAH, CRAIG :
DOUGLAS COOK-STEVENSON, ARUN :
JAYARAM, DARIA DUDAREVITCH, CHEN :
MISHAEL, MARIA WU, BRUCE A. :
FASTENBERG, BING WANG, SHIRLEY CHU, :
JESSE MITCHELL, TARANEH NAINI, :
ELIZABETH CRAIN, MICHAEL CHAPMAN, :
VALERIE SUN, DANA MAZO, EZRA SUVEYKE, :
JEFFREY LESLIE, AELI PARK, JASON :
SCHLEIFER, DEEPRO MUKHERJEE, EVAN :
WAGOWSKI, SARA DAI FREELAND, ASHLEY :
KEYES JACOBS, ALEXANDER GREENSPAN, :
STEPHEN LEVEN, LANGHORNE S. PERROW, :
RAGINI SINGLA, MARCELLA PEREIRA, :
ANDREA DUA, JUN LI, WILLIAM D. :
CONNOLLY, WILLIAM HUGHES MILAM JR., :
JEANNE KANE ZAYKOWSKI, FRANCOIS :
BAUCHE, AJAY AYYAPPAN, JOSHUA LAKE :
MCGUIRE, DANIEL RICCIARDI, ELLEN :
CHUNG NO CHAU, KERRY BLUM, SEBASTIEN :

Venue is proper in this Court pursuant
to CPLR § 503(a).

GAGNON, MONICA LEARY, AMY Y. SUN, :
 HARVEY HECHT, ELIZABETH M. CRESCI, :
 SERDJAN AYE BALACH, SEAN SAROYA, :
 NAIYING KUO, MATTHEW L. BURT, NINA :
 ESSMAN, AMIT MEHROTRA, STEPHEN P. :
 LAMB, JONATHAN FLAHERTY, MICHIKO :
 MURAO, DENIS O'LEARY, STEPHANIE BOW- :
 SHIN LIU, MARCUS MEYER, MUNISH :
 VIRALAM, ALEX BOW-YU LIU, BARBE :
 JEANNINE BISMUTH TRUST, CARLO A. :
 LIBARIDIAN, HILDUR ISABELLA BOYLSTON, :
 JOYCE GORDON REVOCABLE INDENTURE OF :
 TRUST, AMANDA LEIGH GABAI, JESSICA LEE, :
 ERIC WANG, MEI LI CHONG, CALVERT H. :
 CRARY II., ELIZABETH A. HAFTER, :
 ELIZABETH LYKES DIMMITT, MELISSA :
 CHEONG, KENNETH B. GOLDMAN, THOMAS :
 SCHILD, BULENT KOZLU, AARON ADAMS, :
 ANUSHKA GUPTA, OMRI BEER, ELAINE SAM, :
 NATHANIEL B. PETTIS, SIM SENG LIM, :
 SHARAD KOHLI, RICHARD H. ROTHMAN, :
 EMILY A. SIMONIS, ANDREW SCRUTON, :
 JEREMY GLICK, RAJAN VIG, MARC BENDA, :
 AND THOMAS ROBERT BURNS, :

Defendants. :
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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 attorneys within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York).

In case of failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: New York, New York
August 18, 2017

HERRICK, FEINSTEIN LLP

By: /s/ Jonathan L. Adler

Jonathan L. Adler

Brendan O. Schmitt

Attorneys for Plaintiff

Two Park Avenue

New York, New York 10016

212.592.1400

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COMPLAINT

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 AND THOMAS ROBERT BURNS, :

Defendants. :

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Plaintiff Apple and Honey, LLC d/b/a HMH Iron Design LLC (“Plaintiff” or “HMH”),
 by and through its undersigned counsel, for its Complaint against 71 Smith Street Property
 Owner, L.L.C. (“71 Smith”), The Boerum Condominium (“Boerum”), Lettire Construction Corp.
 (“Lettire,” and collectively with 71 Smith and Boerum, the “Property Defendants”), Fidelity &
 Deposit Company or Maryland (“Fidelity”), 140 Schermerhorn Street Property Owner LLC,
 Souaz LLC, Mear Holdings LLC, MSMA LLC, Bluespade LLC, Loke Twin Corporation (“Loke
 Twin Corp.”), Edge Associates LLC, Merlion Realty LLC, CM Brothers LLC, Deerah LLC, SK
 Boerum LLC, Pineapple 8 LLC, Sky R. Realty LLC, Brooklynth LLC, Yellow House Too LLC,



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