

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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LADONNA ARTHURS,

Index No.: 156729/2017
(ECF)

Plaintiff,

v.

**RESPONSE TO
PRELIMINARY
CONFERENCE ORDER**

MARRIOTT INTERNATIONAL, INC., RENAISSANCE
HOTEL MANAGEMENT COMPANY LLC, SOL
GOLDMAN INVESTMENTS, LLC. APPLE EIGHT
HOSPITALITY MANAGEMENT, INC. AND APPLE EIGHT
HOSPITALITY OWNERSHIP, INC.

Defendants.
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PLEASE TAKE NOTICE, that Defendants, Marriott International, Inc., Apple Eight
Hospitality Management, Inc. , Sol Goldman Investments, LLC and Apple Eight Hospitality
Ownership, Inc., by its attorneys, Eustace, Marquez, Epstein, Prezioso & Yapchanyk, hereby
respond to this Court's Preliminary Conference Order dated August 15, 2018 as follows:

INSURANCE INFORMATION

Defendants are insured under Chubb Group of Insurance Companies Policy Number
99476047, effective November 1, 2015 through November 1, 2016. Said policy provides
coverage in the amount of \$1,000,000 per loss per year.

Defendants are also insured under Fireman’s Fund Excess Policy Number SHX-000-
2450-0761, effective November 1, 2015 to November 1, 2016. Said policy provides excess
coverage in the amount of \$50,000,000 per loss.

WITNESSES

The following individuals may have knowledge or information relative to the subject
incident:

Pedro Gutierrez

William Bravo

STATEMENTS OF OPPOSING PARTIES

Defendants are not in possession of adverse party statements relative to this action.

PHOTOGRAPHS

Defendants are not in possession of photos or videotapes relative to the subject incident.

ACCIDENT REPORT

See Exhibit A.


EXPERT WITNESSES

Defendants have not yet designated expert witnesses to testify at the time of trial of this action, but hereby reserve(s) all such rights pursuant to CPLR § 3101 (d)(1).

Defendants hereby reserve the right to amend and/or supplement this response up to and including the time of trial.

DATED: September 13, 2018
New York, New York

Eustace, Marquez, Epstein, Prezioso &
Yapchanyk
Attorneys for Defendants,
**MARRIOTT INTERNATIONAL, INC.,
APPLE EIGHT HOSPITALITY
MANAGEMENT, INC. , SOL
GOLDMAN INVESTMENTS, LLC AND
APPLE EIGHT HOSPITALITY
OWNERSHIP, INC.**
55 Water Street, 28th Floor
New York, New York 10041
(212) 612-4200


By: _____
Miles A. Linefsky

TO:

Charles N. Pizzolo, Esq.
Attorneys for Plaintiff,
Ladonna Arthurs
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Garden City, New York 11530
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LADONNA ARTHURS,

Plaintiff,

-against-

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MANAGEMENT COMPANY LLC, SOL GOLDMAN INVESTMENTS,
LLC. APPLE EIGHT HOSPITALITY MANAGEMENT, INC. AND APPLE
EIGHT HOSPITALITY OWNERSHIP, INC.

Defendants.

RESPONSE TO PRELIMINARY CONFERENCE ORDER

EUSTACE, MARQUEZ, EPSTEIN, PREZIOSO & YAPCHANYK

Attorneys for Defendants

**Marriott International, Inc., Apple Eight Hospitality Management, Inc., Sol Goldman
Investments, LLC and Apple Eight Hospitality Ownership, Inc.**

Office and Post Office Address

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