

Print or type, double spaced, using **black ink only**.

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

_____x		Index Number
IHL Group Inc		656025/2023
[fill in name(s)]	Plaintiff(s),	

Roger Cabello	- against-	ANSWER
[fill in name(s)]	Defendant(s).	
_____x		

As and for his / her answer to the complaint herein, the defendant, Roger Cabello

_____, respectfully shows and alleges as follows [number separate paragraphs below]:

A. Admits the truth of the allegation(s) of Paragraph(s) 1,4, 10 of the complaint.

B. Denies knowledge or information sufficient to form a belief as to the truth of the allegation(s) of Paragraph(s) 9, 14, 16 of the complaint.

C. Denies the allegations of Paragraph(s) 2,3,5,6,7,8,11,12,13,15,17,18,19,20
21,22,23,24,25,26,27,28 of the complaint.

Affirmative Defenses

- Number 1 - Admits the truth
- Number 2 -Denies the allegation. I do not live in Clifton nor in the County of Passaic I live in Cliffwood, NJ in Mounmouth County
- Number 3 -Denies the allegation. There is no agreement submitted, Plaintiff failed to provide the court witht the signed estimate with the terms of the agreement.
- As shown in Exhibit A.
- Number 4 - Admits the truth but the Plaintiff left out the second outstanding unpaid invoice - As shown in Exhibit B.
And Plaintiff failed to fund project on time as per signed estimate.
- Number 5 -Denies the allegation. Jason Wu cancelled the production of those bags, Jason Wu informed Roger Cabello, during production that the bags mentioned on allegation 6, did not pass the QVC quality test, had been cancelled and did not have to be produced.
- Number 6 - Denies the allegation. Jason Wu cancelled the production of those bags, Jason Wu informed Roger Cabello, during production that the bags mentioned on allegation 6, did not pass the QVC quality test, had been cancelled and did not have to be produced.
- Number 7 - Denies the allegation.
- Number 8 - Denies the allegation.



Affirmative Defenses

Number 9 - Denies knowledge or information sufficient to form a belief as to the truth of the allegations.

Number 10 - Admits the truth But the Plaintiff has violated the agreement 2 times. Plaintiff failed to fund project on time as stated on the signed estimate. Listed under term number 2. Plaintiff has violated the copyrights granted 2 times. As shown on Exhibit C

Number 11 - Denies the allegation.

BREACH OF AGREEMENT

Number 12 - Denies the allegation. the Plaintiff failed to paid all invoices.

The only explanation for the unpaid invoice, has been by Jason Wu, who stated that they had almost gone out of business 2 times last year and they had no money.

Number 13 - Denies the allegation.

BREACH OF AGREEMENT

Number 14 - Denies knowledge or information sufficient to form a belief as to the truth of the allegations.

Number 15 - Denies the allegation.

BREACH OF AGREEMENT

Number 16 - Denies knowledge or information sufficient to form a belief as to the truth of the allegations.

Number 17 - Denies the allegation.

UNPAID INVOICE

Number 18 - Denies the allegation.

UNPAID INVOICE

Number 19 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 20 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 21 - Denies the allegation.

UNPAID INVOICE

Number 22 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 23 - Denies the allegation.

UNPAID INVOICE

Number 24 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 25 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 26 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

Number 27 - Denies the allegation.


PLAINTIFF BREACHED AGREEMENT

Number 28 - Denies the allegation.

PLAINTIFF BREACHED AGREEMENT

WHEREFORE, defendant prays that this court dismiss the complaint of the plaintiff herein, with costs and disbursements to defendant, together with any other relief the Court finds to be just and proper.

Dated: Jan 22nd, 2024



 Signature
 Roger Cabello

 Print name
 197 County RD

 CLiffwood NJ 07721

 917-714-1757

 Address and Telephone Number


VERIFICATION

STATE OF NEW YORK

COUNTY OF New York ss:

Roger Cabello, being duly sworn, deposes and says:

I am the/a defendant in the above-entitled action. I have read the foregoing answer and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true.



 [sign your name in front of a Notary]
ROGER CABELLO

 [print your name]

Sworn to before me this

22 day of January, 2024



 Notary Public

LISA KING
 Notary Public, State of New York
 Reg. No. 04K10013921
 Qualified in New York County
 Commission Expires Sept. 28, 2027

JAN 22 2024