

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

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RENITA JANELLE MOORE, as Administrator  
of the Estate of B.E.M.F. a/k/a B.E.M.F.,  
deceased, and RENITA JANELLE MOORE,  
individually,

**Index No.: 805344/2023**

**VERIFIED ANSWER ON  
BEHALF OF LIRON BAR-EL,  
M.D.**

Plaintiffs,

- against -

NAGARAJ GABBUR, M.D.,  
ADVANTAGECARE PHYSICIANS, P.C.,  
ADVANTAGECARE PHYSICIANS IPA,  
LLC, ADVANTAGECARE PHYSICIANS  
UPPER EAST SIDE MEDICAL OFFICE,  
ERAN BORNSTEIN, M.D., ANNAMARIE  
ORTIZ, RDMS, CENTER FOR MATERNAL  
FETAL MEDICINE & OBGYN  
ULTRASOUND, NORTHWELL HEALTH  
PHYSICIAN PARTNERS, INC.,  
NORTHWELL HEALTH PHYSICIAN  
PARTNERS MATERNAL FETAL HEALTH,  
OBSTETRICS & GYNECOLOGY AT  
LENOX HILL HOSPITAL, HARRY  
KARAMITSOS, M.D., LIRON BAR-EL,  
M.D., MICHAEL PLAKOGIANNIS, M.D.,  
LENOX HILL HOSPITAL, LENOX OBGYN  
L.L.C. and NORTHWELL HEALTH, INC.,

Defendants.

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**COUNSEL:**

Defendant LIRON BAR-EL, M.D. as and for his Verified Answer to Plaintiff's  
Verified Complaint respectfully show to this Honorable Court and allege upon information  
and belief:

*AS AND FOR A FIRST CAUSE OF ACTION ON BEHALF OF  
DECEDENT B.E.M.F. a/k/a B.E.M.F.:*

FIRST: Denies the allegations contained in paragraph “1” in the form alleged, except admits at all relevant times NAGARAJ GABBUR, M.D. was a physician authorized to practice his profession in the State of New York and respectfully refers all questions of law to the Court.

SECOND: Denies the allegations contained in paragraph “2”, “3”, “12”, “23”, “67”, “80”, “81”, “82”, “91”, “94”, “95”, “96”, “105”, “114”, “122”, “123”, “124”, “152”, “153”, “155”, “160”, “161”, “162”, “186”, “187”, “198”, “199”, “200”, “201”, “202”, “203”, “205”, “206”, “208”, “209”, “210”, “211”, “364”, “367” and “368” in the form alleged and respectfully refers all questions of law to the Court.

THIRD: Denies the allegations contained in paragraphs “4”, “5”, “6”, “7”, “8”, “9”, “10”, “11”, “22”, “44”, “45”, “66”, “83”, “84”, “85”, “86”, “87”, “88”, “89”, “92”, “97”, “98”, “99”, “100”, “101”, “102”, “103”, “106”, “107”, “108”, “109”, “110”, “111”, “112”, “113”, “115”, “116”, “117”, “118”, “119”, “120”, “121”, “125”, “126”, “128”, “129”, “130”, “131”, “132”, “133”, “134”, “135”, “136”, “137”, “138”, “139”, “140”, “141”, “142”, “143”, “144”, “145”, “146”, “147”, “148”, “149”, “150”, “151”, “154”, “156”, “157”, “158”, “159”, “163”, “164”, “172”, “174”, “188”, “189”, “190”, “191”, “193”, “194”, “204”, “207”, “220”, “221”, “233”, “234”, “235”, “236”, “237”, “238”, “239”, “240”, “241”, “242”, “243”, “244”, “245”, “246”, “247”, “248”, “249”, “250”, “251”, “252”, “253”, “254”, “255”, “256”, “257”, “258”, “259”, “260”, “261”, “262”, “264”, “286”, “287”, “294”, “295”, “297”, “302”, “303”, “304”, “316”, “317”, “318”, “319”, “320”,

“321”, “322”, “323”, “324”, “325”, “326”, “347”, “355”, “363”, “371”, “379”, “380”, “381”, “382”, “383”, “384”, “385”, “386”, “387”, “389”, “390”, “391”, “392”, “393”, “394”, “395”, “396”, “397”, “399”, “400”, “401” and “402”.

FOURTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “13”, “14”, “15”, “16”, “17”, “18”, “19”, “20”, “21”, “24”, “25”, “26”, “27”, “28”, “29”, “30”, “31”, “32”, “33”, “34”, “35”, “36”, “37”, “38”, “39”, “40”, “41”, “42”, “43”, “46”, “47”, “48”, “49”, “50”, “51”, “52”, “53”, “54”, “55”, “56”, “57”, “58”, “59”, “60”, “61”, “62”, “63”, “64”, “65”, “68”, “69”, “70”, “71”, “72”, “73”, “74”, “75”, “76”, “77”, “78”, “166”, “167”, “168”, “169”, “170”, “171”, “173”, “176”, “177”, “178”, “179”, “180”, “181”, “182”, “183”, “184”, “212”, “213”, “214”, “215”, “216”, “217”, “218”, “219”, “222”, “223”, “224”, “225”, “226”, “227”, “228”, “229”, “230”, “231”, “263”, “265”, “266”, “267”, “268”, “269”, “270”, “271”, “272”, “273”, “274”, “275”, “276”, “277”, “278” “279”, “280”, “281”, “282”, “283”, “284”, “285”, “288”, “289”, “290”, “291”, “292”, “293”, “296”, “298”, “299”, “300”, “301”, “305”, “306”, “307”, “308”, “309”, “310”, “311”, “312”, “313”, “314”, “315”, “327”, “328”, “329”, “330”, “331”, “332”, “333”, “334”, “335”, “336”, “337”, “338”, “339”, “340”, “341”, “342”, “343”, “344”, “345”, “346”, “348”, “349”, “350”, “351”, “352”, “353”, “354”, “356”, “357”, “358”, “359”, “360”, “361”, “362”, “366”, “369”, “370”, “372”, “373”, “374”, “375”, “376”, “377”, “378”, “388” and “398” and respectfully refers all questions of law to the Court.

FIFTH: Denies the allegations contained in paragraphs “79” and “90” in the form alleged, except admits at all relevant times ERAN BORNSTEIN, M.D. was a physician authorized to practice her profession in the State of New York employed by LENOX HILL HOSPITAL and respectfully refers all questions of law to the Court.

SIXTH: Denies the allegations contained in paragraphs “93” and “104” in the form alleged, except admits at all relevant times ANNAMARIE ORTIZ, RDMS was a sonographer authorized to practice her profession in the State of New York employed by LENOX HILL HOSPITAL and respectfully refers all questions of law to the Court.

SEVENTH: Denies the allegations contained in paragraph “127” in the form alleged, except admits as of March 4, 2021 NORTHWELL HEALTH PHYSICIAN PARTNERS, INC. was a not-for-profit corporation organized pursuant to New York State law.

EIGHTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “165” except admit at all relevant times upon information and belief HARRY KARAMITSOS, M.D. was a physician authorized to practice his profession in the State of New York and respectfully refers all questions of law to the Court.

NINTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “175” except admit at all relevant times upon information and belief MICHAEL PLAKOGIANNIS, M.D. was a physician authorized to

practice his profession in the State of New York and respectfully refers all questions of law to the Court.

TENTH: Denies the allegations contained in paragraphs “185” and “192” in the form alleged, except admits at all relevant times LIRON BAR-EL, M.D. was a physician authorized to practice her profession in the State of New York employed by LENOX HILL HOSPITAL and respectfully refers all questions of law to the Court.

ELEVENTH: Denies the allegations contained in paragraphs “195”, “196” and “197” in the form alleged, except admits at all relevant times LENOX HILL HOSPITAL s/h/a CENTER FOR MATERNAL FETAL MEDICINE & OBGYN ULTRASOUND and LENOX HILL HOSPITAL s/h/a NORTHWELL HEALTH PHYSICIAN PARTNERS MATERNAL FETAL HEALTH, OBSTETRICS & GYNECOLOGY AT LENOX HILL HOSPITAL was a not-for-profit corporation organized pursuant to New York State law which operated a hospital located at 100 East 77<sup>th</sup> Street, New York, New York and respectfully refers all questions of law to the Court.

TWELFTH: Denies the allegations contained in paragraph “232” in the form alleged, except admits at all relevant times NORTHWELL HEALTH, INC. was a not-for-profit corporation organized pursuant to New York State law and respectfully refers all questions of law to the Court.

THIRTEENTH: Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “365” except admit one RENITA

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