

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORLEANS

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LYNDONVILLE CENTRAL SCHOOL DISTRICT  
and LYNDONVILLE ELEMENTARY SCHOOL,

Plaintiffs,

v.

**VERIFIED ANSWER WITH  
COUNTERCLAIMS,  
CROSSCLAIMS, AND  
AFFIRMATIVE DEFENSES**

UTICA MUTUAL INSURANCE COMPANY,  
GRAPHIC ARTS MUTUAL INSURANCE  
COMPANY, UTICA NATIONAL ASSURANCE  
COMPANY, AB 511 DOE, and AB 524 DOE,

Index No. E23-01101

Defendants.

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The Defendants, UTICA MUTUAL INSURANCE COMPANY, GRAPHIC ARTS  
MUTUAL INSURANCE COMPANY, and UTICA NATIONAL ASSURANCE COMPANY,  
hereinafter referred to as “these defendants” by their attorneys, HURWITZ FINE P.C., as and for  
an answer to the complaint of the Plaintiffs, LYNDONVILLE CENTRAL SCHOOL DISTRICT  
and LYNDONVILLE ELEMENTARY SCHOOL, herein states the following:

1. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “1” of the plaintiffs’ verified complaint.
2. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “2” of the plaintiffs’ verified complaint.
3. These Defendants deny upon information and belief the allegations contained in paragraph “3”, except admit that defendant Utica Mutual Insurance Group is an insurance company domiciled within the State of New York and is authorized to sell insurance policies in New York State.

4. These Defendants deny upon information and belief the allegations contained in paragraph “4”, except admit that defendant Graphic Arts Mutual Insurance Company is an insurance company domiciled within the State of New York and is authorized to sell insurance policies in New York State.

5. These Defendants deny upon information and belief the allegations contained in paragraph “5”, except admit that defendant Utica National Assurance Company is an insurance company domiciled within the State of New York and is authorized to sell insurance policies in New York State.

6. These Defendants admit the allegations contained in paragraph “6” of the plaintiffs’ verified complaint.

7. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “7” of the plaintiffs’ verified complaint.

8. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “8” of the plaintiffs’ verified complaint.

9. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “9” of the plaintiffs’ verified complaint.

10. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “10” of the plaintiffs’ verified complaint.

11. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “11” of the plaintiffs’ verified complaint.

12. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “12” of the plaintiffs’ verified complaint.

13. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “13” of the plaintiffs’ verified complaint.

14. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “14” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

15. These Defendants deny the allegations contained in paragraph “15” of the plaintiffs’ verified complaint and respectfully refer all questions of law to the court.

16. These Defendants deny the allegations contained in paragraph “16” of the plaintiffs’ verified complaint and respectfully refer all questions of law to the court.

17. These Defendants deny the allegations contained in paragraph “17” of the plaintiffs’ verified complaint and respectfully refer all questions of law to the court.

18. As to paragraph “18” of the plaintiff’s verified complaint, the allegations are not directed at these defendants and therefore no response is required. To the extent a response is required, these defendants deny the allegations and refer all questions of law to the court.

19. As to paragraph “19” of the plaintiff’s verified complaint, the allegations are not directed at these defendants and therefore no response is required. To the extent a response is required, these defendants deny the allegations and refer all questions of law to the court.

20. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “20” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

21. These Defendants deny the allegations contained in paragraph “21” of the plaintiffs’ verified complaint and respectfully refer all questions of law to the court.

22. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “22” of the plaintiffs’ verified complaint.

23. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “23” of the plaintiffs’ verified complaint.

24. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “24” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

25. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “25” of the plaintiffs’ verified complaint.

26. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “26” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

27. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “27” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

28. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “28” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

29. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “29” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

30. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “30” of the plaintiffs’ verified complaint, and respectfully refer all questions of law to the court.

31. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “31” of the plaintiffs’ verified complaint.

32. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “32” of the plaintiffs’ verified complaint.

33. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “33” of the plaintiffs’ verified complaint.

34. These Defendants deny having knowledge and information sufficient to form a belief as to the allegations contained in paragraph “34” of the plaintiffs’ verified complaint.

35. These Defendants deny upon information and belief the allegations contained in paragraph “35” of the plaintiffs’ verified complaint.

36. These Defendants deny upon information and belief the allegations contained in paragraph “36” of the plaintiffs’ verified complaint.

37. These Defendants deny upon information and belief the allegations contained in paragraph “37” of the plaintiffs’ verified complaint.

38. These Defendants deny upon information and belief the allegations contained in paragraph “38” of the plaintiffs’ verified complaint.

39. These Defendants deny upon information and belief the allegations contained in paragraph “39” of the plaintiffs’ verified complaint.

40. These Defendants deny upon information and belief the allegations contained in paragraph “40” of the plaintiffs’ verified complaint.

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