

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

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CHANGE YOUR LIFE LLC,	:	Index No.:
	:	157335/2020
	:	
Plaintiff,	:	
	:	<b><u>REPLY TO</u></b>
-against-	:	<b><u>COUNTERCLAIMS</u></b>
	:	
E16 BY 1771 HOLDINGS LLC,	:	
	:	
Defendant.	:	
-----X	:	

Plaintiff, **Change Your Life LLC**, by its attorney, the Law Offices of Fred L. Seeman, upon information and belief, allege the following as and for its Reply to Counterclaims:

**GENERAL DENIAL**

1. That Plaintiff denies the allegations contained in paragraphs “15”, “21”, “42” of the Answer with Counterclaims in its entirety.
2. That Plaintiff lacks knowledge and information sufficient to form a belief as to paragraph “14”, “16”, “17”, “18”, “19”, “20”, “22”, “23”, “24”, “25”, “26”, “27”, “28”, “29”, “30”, “31”, “32”, “33”, “34”, “35”, “36”, “37”, “38”, “39”, “40”, “41”, “43”, “44”, “45”, “46”, “47”, “48”, “49”, “50”, “51”, “52”, “53”, “54”, “55”, “56” of the Answer with Counterclaims.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

3. That the Defendants’ counterclaims fail to state a cause of action.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

4. That the Defendants’ counterclaims are barred in whole or in part by the applicable statute of limitations.

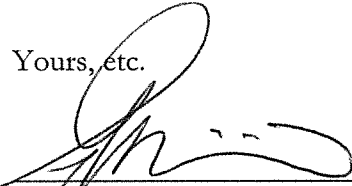
**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

5. That the Defendants’ counterclaims are barred in whole or in part by governing lease.

**WHEREFORE**, Plaintiff respectfully requests a judgment dismissing the Defendant's Counterclaims, together with reasonable attorney fees as determined by the court and such other and further relief as to the Court may seem just and proper.

Dated: New York, New York  
October 26, 2020

Yours, etc.



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Law Offices of Fred L. Seeman  
By: Peter Kirwin, Esq.  
*Attorneys for Plaintiff*  
32 Broadway, Suite 1214  
New York, New York 10004  
Tel: (212) 608-5000

To: Adam Leitman Bailey, P.C.  
Attorneys for Defendant  
One Battery Park Plaza—18<sup>th</sup> Floor  
New York, New York 10004  
Tel: (212) 825-0365

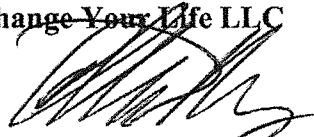
**VERIFICATION**

STATE OF NEW YORK     }  
  }  
  } ss.:  
COUNTY OF NEW YORK }

Christopher Murray, being duly sworn, deposes and say:


I am the chief operating officer of Change Your Life LLC, the Plaintiff herein. I have read the foregoing Reply to Counterclaims and know the contents thereof; and the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe it to be true.

~~Change Your Life LLC~~



By: Christopher Murray  
Its: Chief Operating Officer

Sworn to before me this  
26 day of October, 2020

  
\_\_\_\_\_  
Notary Public

Index No. 157335 Year /2020 RJI No. Hon.  
SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK:

CHANGE YOUR LIFE LLC,

Plaintiff,

-against-

9E16 BY 1771 HOLDINGS LLC,

Defendant.

REPLY TO COUNTERCLAIMS

FRED L. SEEMAN  
ATTORNEY AT LAW

Attorney for

Plaintiff

Office and Post Office Address, Telephone

32 BROADWAY, SUITE 1214

NEW YORK, NEW YORK 10004

TEL: (212) 608-5000

FAX: (212) 385-8161

To

Compliance Pursuant to 22NYCRR § 130-1.1-a

To the best of the undersigned's knowledge, information and belief formed after an inquiry reasonable under the circumstances, the within document(s) and contentions contained herein are not frivolous as defined in 22NYCRR §130-1.1-a

Attorney(s) for

Print name beneath

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for

Please take notice

NOTICE OF ENTRY

that the within is a (certified) true copy of a  
duly entered in the office of the clerk of the within named court on

NOTICE OF SETTLEMENT

that an order  
settlement to the HON.  
of the within named court, at  
on

of which the within is a true copy will be presented for  
one of the judges

at 1 M

Dated,

Yours, etc.

FRED L SEEMAN