

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

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ANVIL MECHANICAL, INC.,

Plaintiff,

Index No.: 654448/2020

VERIFIED REPLY

-against -

GCT CONSTRUCTORS JV, SCHIAVONE
CONSTRUCTION CO., LLC, FIDELITY & DEPOSIT
COMPANY OF MARYLAND, ZURICH AMERICAN
INSURANCE COMPANY, LIBERTY MUTUAL
INSURANCE COMPANY, THE CONTINENTAL
INSURANCE COMPANY, XL SPECIALTY INSURANCE
COMPANY and NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendants.
-----X

Plaintiff, Anvil Mechanical, Inc. (“Anvil”), by its attorneys, Welby, Brady & Greenblatt, LLP, as and for its reply to the counterclaim asserted in the Answer of Defendants, GCT Constructors JV, Schiavone Construction Co., LLC, Fidelity and Deposit Company of Maryland, Zurich American Insurance Company, Liberty Mutual Insurance Company, The Continental Insurance Company, XL Specialty Insurance Company and National Union Fire Insurance Company of Pittsburgh, PA, dated January 28, 2021 (the “Counterclaim”), alleges as follows:

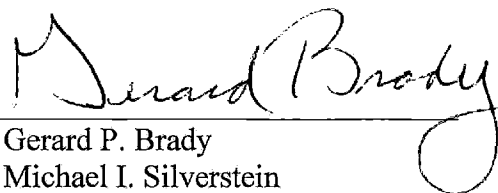
1. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations asserted in paragraphs marked “78” of the Counterclaim.
2. Denies the allegations asserted in paragraph marked “79” of the Counterclaim.
3. Denies the allegations asserted in paragraph marked “80” of the Counterclaim.
4. Denies the allegations asserted in paragraph marked “81” of the Counterclaim.
5. Denies the allegations asserted in paragraph marked “82” of the Counterclaim.
6. Denies the allegations asserted in paragraph marked “83” of the Counterclaim.

7. Denies the allegations asserted in paragraph marked "84" of the Counterclaim.
8. Denies the allegations asserted in paragraph marked "85" of the Counterclaim.
9. Denies the allegations asserted in paragraph marked "86" of the Counterclaim.

WHEREFORE, Plaintiff, Anvil Mechanical, Inc., demands judgment dismissing the Defendants' Counterclaim, for the relief demanded in its Complaint; and for such other, further and different relief as this Court may deem just and proper in the circumstances.

Dated: White Plains, New York
March 15, 2021

WELBY, BRADY & GREENBLATT LLP

By: 

Gerard P. Brady
Michael I. Silverstein
Attorneys for Plaintiff
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CORPORATE VERIFICATION


STATE OF NEW YORK)
) ss.:
COUNTY OF WESTCHESTER)

Daniel Leito, being duly sworn, deposes and says:

Deponent is the President of Anvil Mechanical, Inc., the Plaintiff in the within action, which is a corporation created under and by virtue of the laws of the State of New York;

Deponent has read the foregoing Reply and knows the contents thereof; that the same is true of deponent's own knowledge, except as to the matters therein alleged upon information and belief, and as to those matters deponent believes them to be true.

The grounds of deponent's belief as to all matters not stated upon deponent's own knowledge are as follows: the books, records, and conversations with representatives of Anvil Mechanical, Inc. who are personally familiar with the matter.


Daniel Leito

Sworn to before me this
15th day of March, 2021


NOTARY PUBLIC

SENDY PAOLO MONTEIELLO
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01M06471877
Qualified in Westchester County
Commission Expires December 16, 2023