

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

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CAROLINA GILDRED, an individual, :
 :
Plaintiff, :
 :
vs. :
 :

INDEX No. 153554/2017
Hon. Gerald Lebovits
60 Centre Street, Room 556
New York, New York 10007

MICHAEL D. FOSTER (aka DARREN M. :
FOSTER, an individual, :
 :
Defendant. :

**AFFIRMATION OF SETH A. RAFKIN
IN SUPPORT OF PLAINTIFF'S
MOTION TO DISMISS VERIFIED
ANSWER, AFFIRMATIVE DEFENSES
AND COUNTERCLAIMS; MOTION TO
DISMISS COUNTERCLAIMS; AND, IN
THE ALTERNATIVE, MOTION TO
CORRECT PLEADINGS**

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I, Seth A. Rafkin, am counsel of record for Plaintiff in the above-captioned matter. I provide this Affirmation pursuant to CPLR 2106 and hereby declare that the following is true and correct and that I could and would testify competently thereto.

Attached hereto as Exhibit A is a true and correct copy of Defendant's Verified Answer, Affirmative Defenses and Counterclaims, along with additional exhibits ("Amended Answer"). (ECF Docket, Documents # 10-13).

I declare under penalty of perjury under the laws of the State of New York and the State of New Jersey the foregoing is true and correct.

Executed this 7th day of June, 2017 at Randolph, New Jersey.



Seth Rafkin