

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

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CAROLINA GILDRED, an individual,	:	INDEX No. 153554/2017
	:	Hon. Gerald Lebovits
Plaintiff,	:	60 Centre Street, Room 556
	:	New York, New York 10007
vs.	:	
MICHAEL D. FOSTER (aka DARREN M. FOSTER), an individual,	:	AFFIRMATION OF MICHAEL FOSTER
	:	IN OPPOSITION TO
Defendant.	:	COMPLAINANT'S OPPOSITION
	:	TO DEFENDANTS MOTION TO
	:	COMPEL ANSWERS TO
----- X		DISCOVERIES DEEMED
		ADMITTED and to STRIKE
		PLAINTIFFS COMPLAINT

I, Michael Foster, am Pro Se Affiant of record for Defendant 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.

1. I am aware of Plaintiff seeking to obtain Order of Court to deny defendant pending Motion to Compel Answers to Defendant Discoveries and to Strike plaintiff Complaint by the misconstrued premise that the Court's order dated June 15, 2018 (Docket No.

117) was anything but consistent with defendants 3rd consecutive "Motion for Summary Judgment" and further , I am aware that plaintiff refuse a courtesy copy at the recent Complainsce Hearing to the extent the clerk suggest a "Motion to Compel".

2. Plaintiff served Defendant with Plaintiff's First Interrogatories, First Requests for Admissions, First Requests for Production. The answers to Defendant made public and by emailor text to Plaintiffs, was sent in time according to Compliance Order and can be found here:

- https://tomgildred.info/A-4seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/c-2seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/A-2seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/A-3seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/A-4seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/A-5seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/b-1seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/b-1seth_rafkin_the_hero_esq_in_cart.html
- https://tomgildred.info/c-1seth_rafkin_the_hero_esq_in_cart.html