

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

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DENNIS KILKENNY AND PATRICIA KILKENNY, :

Index No. 190011/2024

Plaintiffs,

- against -

AII ACQUISITION, LLC, et al.,

Defendants.
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:
: DEFENDANT PANASONIC OF
: NORTH AMERICA’S VERIFIED
: ANSWER TO PLAINTIFFS’
: VERIFIED COMPLAINT WITH
: AFFIRMATIVE DEFENSES AND
: CROSS-CLAIMS
:
:
X

Defendant Panasonic of North America (hereinafter “Panasonic”), by its attorneys, Manning Gross + Massenburg LLP by way of a Verified Answer to Plaintiffs’ Verified Complaint (hereinafter “Complaint”), states as follows:

COMPLAINT

1. PANASONIC denies any knowledge or information sufficient to form a belief as to the allegations contained in paragraph of the Complaint numbered “1”.

2. As “Defendants” refers to PANASONIC, PANASONIC denies the allegations contained in paragraph of the Complaint numbered “2” except to admit that PANASONIC has “conducted business in” the State of New York, and begs leave to refer all questions of law to this honorable Court.

3. As “Defendants” refers to parties other than PANASONIC, PANASONIC denies any knowledge or information sufficient to form a belief as to the allegations contained in paragraph of the Complaint numbered “2”.

4. PANASONIC denies each and every allegation contained in paragraphs “3” through “9” of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

5. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs “3” through “9” of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

AS AND FOR AN ANSWER TO THE FIRST CAUSE OF ACTION,
PANASONIC ANSWERS AS FOLLOWS:

PANASONIC repeats and reiterates each and every response hereinbefore made with the same force and effect as though the same were set forth at length herein in response to paragraphs “1” through “9” of the Complaint.

6. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraph “10” of the Complaint, and begs leave to refer all questions of law to this honorable Court.

7. PANASONIC denies each and every allegation contained in paragraphs “11” through “19” of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

8. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs “11” through

“19” of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

9. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs “20” through “22” of the Complaint, and begs leave to refer all questions of law to this honorable Court.

10. PANASONIC denies each and every allegation contained in paragraphs “23” through “35” of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

11. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs “23” through “35” of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

WHEREFORE, defendant denies it is liable for any damages, compensatory, punitive or otherwise.

**AS AND FOR AN ANSWER TO THE SECOND CAUSE OF ACTION,
PANASONIC ANSWERS AS FOLLOWS:**

PANASONIC repeats and reiterates each and every response hereinbefore made with the same force and effect as though the same were set forth at length herein in response to paragraphs “1” through “35” of the Complaint.

12. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraph "36" of the Complaint, and begs leave to refer all questions of law to this honorable Court.

13. PANASONIC denies each and every allegation contained in paragraphs "37" through "39" of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

14. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs "37" through "39" of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

WHEREFORE, defendant denies it is liable for any damages, compensatory, punitive or otherwise.

AS AND FOR AN ANSWER TO THE THIRD CAUSE OF ACTION,
PANASONIC ANSWERS AS FOLLOWS:

PANASONIC repeats and reiterates each and every response hereinbefore made with the same force and effect as though the same were set forth at length herein in response to paragraphs "1" through "39" of the Complaint.

15. PANASONIC denies each and every allegation contained in paragraphs "40" through "41" of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

16. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs "40" through "41" of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

WHEREFORE, defendant denies it is liable for any damages, compensatory, punitive or otherwise.

AS AND FOR AN ANSWER TO THE FOURTH CAUSE OF ACTION,
PANASONIC ANSWERS AS FOLLOWS:

PANASONIC repeats and reiterates each and every response hereinbefore made with the same force and effect as though the same were set forth at length herein in response to paragraphs "1" through "41" of the Complaint.

17. PANASONIC denies each and every allegation contained in paragraphs "43", "44", "46", "47", "48", "49", "50", "51", "52", "54", "56", "57", "58", "59", "60", "61", "62", "63", "64", "65", "66" and "68" of the Complaint to the extent that such allegations are directed towards PANASONIC, and begs leave to refer all questions of law to this honorable Court.

18. PANASONIC is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in paragraphs "43", "44", "46", "47", "48", "49", "50", "51", "52", "54", "56", "57", "58", "59", "60", "61", "62", "63", "64", "65", "66" and "68" of the Complaint as they relate to other defendants and therefore denies them, and begs leave to refer all questions of law to this honorable Court.

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