INDEX NO. 656025/2023

F: 01/22/2024

. NO. 7	U 1940 9	RECEIVED NYSCER
Print or type, double spa	aced, using <u>black</u> ink only.	
SUPREME COURT OF TO COUNTY OF NEW YORK	HE STATE OF NEW YORK	
	X	Index Number
IHL Group Inc		O SOLO DE SALO MENTENA EN SALO MENTENA DE LA COMPANSIÓN D
[fill in name(s)]	Plaintiff(s),	656025/2023
Roger Cabello - agai	nst-	ANSWER
[fill in name(s)]	Defendant(s).	
	Х	
As and for his / her	answer to the complaint herein, the de	fendant, Roger Cabello
	, respectfully shows and alleges a	as follows [number separate
paragraphs below]:		
A. Admits the	truth of the allegation(s) of Paragraph	n(s) 1,4, 10
	of the comple	
2 Denies know		
	wledge or information sufficient to form	a belief as to the truth of the
allegation(s) of Paragraph	(s), 14, 10	of
the complaint.	0.0507	0444040454545
Denies the	allegations of Paragraph(s) 2,3,5,6,7	,8,11,12,13,15,17,18,19,20
21,22,23	3,24,25,26,27,28 of the compla	
	Affirmative Defenses	
Number 1 - Admits the tr	ruth	
Number 2 -Denies the all	egation. I do not live in Clifton nor in	the County of Passaic
I live in Cliffwo	ood, NJ in Mounmouth County	
Number 3 -Denies the all	egation. There is no agreement subn	nitted, Plaintiff failed to
- As shown in	ourt witht the signed estimate with the	ne terms of the agreement.
	uth but the Plaintiff left out the secon	nd outstanding uppoid
invoice - As s	shown in Exhibit B.	
And Plaintiff f	failed to fund project on time as per s	signed estimate.

- Number 5 -Denies the allegation. Jason Wu cancelled the production of those bags, Jason Wu informed Roger Cabello, during production that the bags mentioned on allegation 6, did not pass the QVC quality test, had been cancelled and did not have to be produced.
- Number 6 Denies the allegation. Jason Wu cancelled the production of those bags, Jason Wu informed Roger Cabello, during production that the bags mentioned on allegation 6, did not pass the QVC quality test, had been cancelled and did not have to be produced.
- Number 7 Denies the allegation.
- Number 8 Denies the allegation.



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Affirmative Defenses

- Number 9 Denies knowledge or information sufficient to form a belief as to the truth of the allegations.
- Number 10 Admits the truth But the Plaintiff has violated the agreement 2 times. Plaintiff falled to fund project on time as stated on the signed estimate. Listed under term number 2. Plaintiff has violated the copyrights granted 2 times. As shown on Exhibit C
- Number 11 Denies the allegation. BREACHOF ABLEEMENT
- Number 12 Denies the allegation, the Plaintiff falled to paid all invoces. The only explanation for the unpaid invoice, has been by Jason Wu. who stated that they had almost gone out of business 2 timess last year and they had no money.
- Number 13 Denies the allegation.

 BFCACY OF AGREEMENT

 Number 14 Denies knowledge or information sufficient to form a belief as to the truth of the allegations.
- Number 15 Denies the allegation. Number 16 - Denies knowledge or information sufficient to form a belief as to the
- truth of the allegations. Number 17 - Denies the allegation. UNPAID INVOICE
- Number 18 Denies the allegation. UNPAID INVOICE

- Number 23 Denies the allegation.

 Number 24 Denies the allegation
- Number 26 Denies the allegation.

 Number 27 Denies the allegation.

 Number 27 Denies the allegation.

 Number 27 Denies the allegation.
- Number 27 Denies the allegation.

 Number 28 Denies the allegation.

 PAINTIF DROACHED AGREEMENT

 PLAINTIF DROACHED AGREEMENT



EW YOR	K COUNTY	CLERK	01/22/2024	04:33	PM	INDEX NO.	656025/2
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			1,000			6	
costs and	disbursements	t prays that to defend	at this court dismiss lant, together with	the complain any other reli	int of the lief the	e plaintiff herein, with Court finds to be just	
Dated:	Jan 22nd	20.24	C C	78		50	
Dutcu.		, 20 <u>21</u>			Signa	ature	
					Roger	Cabello	
					197 Cc	ounty RD	
				CLi	iffwood	NJ 07721	
					917-71	4-1757	
				Address	and Te	lephone Number	
			VERIFICATION	١			
STATE OF							
COUNTY	OF New Yo	rk ss:					
	Roger Ca	bello		being duly swo	orn, dep	ooses and says:	
l an	n the/a defendar	nt in the abo	ove-entitled action.	I have read the	e forego	ping answer and know	
the content	ts thereof. The s	same are tr	ue to my knowledge	, except as to	matters	therein stated to be	
alleged on	information and	belief, and	as to those matters,	I believe then	m to be	true.	
			[s	ign your nam	ne in fro	ont of a Notary	
			Ī	2000	n (ABPICO	
				[print	your na	ime]	
Sworn to b	efore me this		1.	: 6			
22 da	y of Jan	~ /:	2024				
Ru	ser K	<u> </u>			÷		
/ /	Notary Publ	ic	8				
	LICA WING	\	IAN 2 °	2024			
Re	Public, State of Ne g. No. 04K100139	21 <i>J</i>	JAN 2	Son V das 8			
Qualif	ied in New York (County 28, 2027					
	WHEREFCOSTS and and proper Dated:	WHEREFORE, defendant costs and disbursements and proper. Dated: Jan 22nd STATE OF NEW YORK COUNTY OF New York Roger Ca I am the/a defendant the contents thereof. The standard on information and standard on information and standard on information and standard public, State of New York Reg. No. 04K100139	WHEREFORE, defendant prays the costs and disbursements to defend and proper. Dated: Jan 22nd, 2024 STATE OF NEW YORK COUNTY OF New York ss: Roger Cabello I am the/a defendant in the about the contents thereof. The same are trailleged on information and belief, and Sworn to before me this WHEREFORE, defendant prays the costs and disbursements to defend and proper.	WHEREFORE, defendant prays that this court dismiss costs and disbursements to defendant, together with and proper. Dated:	WHEREFORE, defendant prays that this court dismiss the complain costs and disbursements to defendant, together with any other reliand proper. Dated:	WHEREFORE, defendant prays that this court dismiss the complaint of the costs and disbursements to defendant, together with any other relief the and proper. Dated:	WHEREFORE, defendant prays that this court dismiss the complaint of the plaintiff herein, with costs and disbursements to defendant, together with any other relief the Court finds to be just and proper. Dated: