

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

VINCENT FORRAS, on behalf of himself and all others
of and in the City of New York, County of New York,
similarly situated,

Plaintiff,

-against-

FEISAL ABDUL RAUF, and CORDOBA HOUSE/PARK
51, CORDOBA INITIATIVE, SOHO PROPERTIES, and
all other aliases known and unknown,

Defendants.

Index
#111970/2010

**VERIFIED
ANSWER**

Defendants, by their attorneys, Adam Leitman Bailey, P.C., answering
Plaintiff's complaint, respectfully avers:

1. Generally denies that there is a class for which Plaintiff is a proper representative.
2. Denies each and every allegation in paragraphs 2, 3, 4, 8, the first paragraph 9, 10, 14, 15, 22, 23, 24, 25, 26, 28, 29, 30, 31, 32, 34, 35, 36, 37, 41, 42, 43, 46, 48, 50, 51, 52, 53, 54, 55, and 56 of Plaintiff's complaint.
3. Denies sufficient knowledge or information so as to form a belief as to each and every allegation in paragraphs 6, the second paragraph 9, 11, 12, 13, 16, 18, 19, 20, 21, 39, 40, 44, 45, and 47 of Plaintiff's complaint.
4. Denies paragraph 5 of Plaintiff's complaint insofar as answering defendants deny that any of the referenced persons and entities are properly described as defendants.

5. Neither denies nor admits the allegations of paragraph 7 of Plaintiff's complaint as the matters set forth in that paragraph are too vague to defendants to be able to frame a response.
6. Denies and admits as hereinbefore denied and admitted each and every allegation of paragraphs 27, 33, 38, and 49 of Plaintiff's complaint.

AS AND FOR AN AFFIRMATIVE DEFENSE

7. Pursuant to the First and Fourteenth Amendments of the Constitution of the United States of America and 42 U.S.C. §1983 this court and every court in the United States of America lacks the subject matter jurisdiction to grant any relief, whether in law or equity, against the erection or maintenance of a religious institutional building predicated upon it being a religious institutional building.

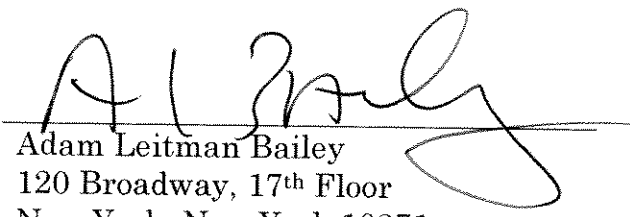
AS AND FOR A COUNTERCLAIM

8. The purported causes of action by the Plaintiff in this suit knowingly advance a claim that is unwarranted under existing law, with knowledge that they cannot be supported by good faith argument for an extension, modification, or reversal of existing law.
9. Defendants are damaged by the advancement of such claims and such damages shall continue to accrue in a sum not less than \$50,000.
10. By reason of the foregoing, Defendants are entitled to an award of \$50,000 for the wholly frivolous actions of the Plaintiff herein.

WHEREFORE, Defendants demand judgment dismissing the complaint together with interests and costs and an award of sanctions on the counterclaim in the sum of \$50,000.00 together with interest and costs.

Dated: New York, New York
October 6, 2010

Yours, etc.,
Adam Leitman Bailey, P.C.
by


Adam Leitman Bailey
120 Broadway, 17th Floor
New York, New York 10271
212-825-0365

TO:
Vincent Forras
pro se
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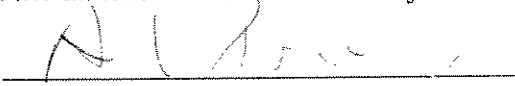
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*Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice
in the courts of New York State, certifies that, upon information and belief and
reasonable inquiry, the contentions contained in the annexed document are not frivolous.*

Dated: October 6, 2010

Signature: 

Print Signer's Name: Adam Leitman Bailey

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