

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ALEXANDRA ZADORYN,

Plaintiff,

-against-

CAB EASY LLC and NEIL GOLDBERG,

Defendants.

INDEX NO. 2181/2015

VERIFIED COMPLAINT

Plaintiff, ALEXANDRA ZADORYN, by her attorneys, LAW OFFICE OF BRIAN M. KING, P.C., as and for its Verified Complaint, respectfully alleges, upon information and belief:

1. The plaintiff, ALEXANDRA ZADORYN, at all times herein mentioned was and still is a resident of the County of Kings and the State of New York.
2. The defendant, CAB EASY LLC, at all times herein mentioned, was and still is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business situated in the County of Union and the State of New Jersey.
3. The defendant, NEIL GOLDBERG, at all times herein mentioned was and still is a resident of the County of Union and the State of New Jersey.
4. The defendant, CAB EASY LLC, at all times herein mentioned was and still is a foreign corporation duly licensed and authorized to do business in the State of New York.
5. The defendant, CAB EASY LLC, at all times herein mentioned conducted and carried on business in the County of Kings and the State of New York.
6. The defendant, CAB EASY LLC, at all times herein mentioned was and still is a partnership doing business in the County of Kings and the State of New York.
7. The defendant, CAB EASY LLC, at all times herein mentioned was and still is a

limited liability partnership doing business in the County of Kings and the State of New York.

8. The defendant, CAB EASY LLC, at all times herein mentioned was and still is a limited liability corporation doing business in the County of Kings and the State of New York.

9. The defendant, CAB EASY LLC, at all times herein mentioned was and still is a sole proprietorship doing business in the County of Kings and the State of New York.

10. At all times herein mentioned, defendant, CAB EASY LLC, transacted business within the State of New York.

11. At all times herein mentioned, defendant, CAB EASY LLC, derived substantial revenue from goods used or consumed or services rendered in the State of New York.

12. At all times herein mentioned, defendant, CAB EASY LLC, expected or should reasonably have expected its acts to have consequences in the State of New York.

13. At all times herein mentioned, defendant, CAB EASY LLC, derived substantial revenue from interstate or international commerce.

14. On or about April 15, 2012, defendant, CAB EASY LLC, was the owner of a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

15. On or about April 15, 2012, defendant, CAB EASY LLC, was the registered owner of a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

16. On or about April 15, 2012, defendant, CAB EASY LLC, was the titled owner of a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

17. On or about April 15, 2012, defendant, CAB EASY LLC, was the lessee of a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

18. On or about April 15, 2012, defendant, CAB EASY LLC, was the lessor of a

certain motor vehicle, bearing New Jersey State license plate number X38BXN.

19. On or about April 15, 2012, defendant, CAB EASY LLC, managed a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

20. On or about April 15, 2012, defendant, CAB EASY LLC, maintained a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

21. On or about April 15, 2012, defendant, CAB EASY LLC, controlled a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

22. On or about April 15, 2012, defendant, CAB EASY LLC, repaired a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

23. On or about April 15, 2012, defendant, CAB EASY LLC, operated a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

24. On or about April 15, 2012, defendant, NEIL GOLDBERG, was the operator of a certain motor vehicle, bearing New Jersey State license plate number X38BXN.

25. On or about April 15, 2012, the motor vehicle bearing New Jersey State license plate number X38BXN was being operated by defendant, NEIL GOLDBERG, with the knowledge, consent and permission, express or implied, of its owner.

26. On or about April 15, 2012, the motor vehicle bearing New Jersey State license plate number X38BXN was being operated by defendant, NEIL GOLDBERG, with the knowledge, consent and permission, express or implied, on the business of its owner.

27. On or about April 15, 2012, the motor vehicle bearing New Jersey State license plate number X38BXN was being operated by defendant, NEIL GOLDBERG, within the scope of his employment.

28. On or about April 15, 2012, plaintiff, ALEXANDRA ZADORYN, was the operator of her motor vehicle bearing New York State license plate number FLM3782.

29. On or about April 15, 2012, and at all times herein mentioned, Belt Parkway and Mill Basin Draw Bridge, was and still is a public roadway and/or thoroughfare in the County of Kings, City and State of New York.

30. On or about April 15, 2012, the motor vehicle bearing New Jersey State license plate number X38BXN was being operated by defendant, NEIL GOLDBERG, at or near the intersection of Belt Parkway and Mill Basin Draw Bridge, in the County of Kings, State of New York.

31. On or about April 15, 2012, the motor vehicle bearing New York State license plate number FLM3782 was being operated by plaintiff, ALEXANDRA ZADORYN, at or near the intersection of Belt Parkway and Mill Basin Draw Bridge, in the County of Kings, State of New York.

32. On or about April 15, 2012, at approximately 3:30 p.m., the vehicle bearing New Jersey State license plate number X38BXN, owned by defendant, CAB EASY LLC, and operated by defendant, NEIL GOLDBERG, came into contact with the motor vehicle bearing New York State license plate number FLM3782, owned and operated by plaintiff ALEXANDRA ZADORYN, at or near the intersection of Belt Parkway and Mill Basin Draw Bridge, in the County of Kings, State of New York.

33. The plaintiff, ALEXANDRA ZARORYN, was injured.

34. The plaintiff, ALEXANDRA ZARORYN, was seriously injured.

35. The plaintiff, ALEXANDRA ZARORYN, was permanently injured.

36. Solely as a result of the defendants' negligence, carelessness and recklessness in ownership, leasing, maintenance, control, and operation of the defendants' motor vehicle, the plaintiff, ALEXANDRA ZARORYN, was caused to suffer severe, serious and permanent, personal injuries to mind and body, and further, that the plaintiff was subjected to great physical pain and mental anguish.


37. As a result of the foregoing, the plaintiff sustained serious personal injuries as defined in Section 5102(d) of the Insurance Law of the State of New York, and/or economic loss greater than basic economic loss as defined in Section 5102(a) of the Insurance Law of the State of New York.

38. This action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

39. Due to defendants' negligence, plaintiff, ALEXANDRA ZARORYN, is entitled to damages.

WHEREFORE, the plaintiff demands judgment awarding damages, in an amount exceeding the monetary jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

Dated: Brooklyn, New York
January 29, 2015



Brian M. King, Esq.
LAW OFFICE OF BRIAN M. KING, P.C.
Attorneys for Plaintiff
ALEXANDRA ZADORYN
1400 Avenue Z, Suite 503
Brooklyn, NY 11235
(718) 942-5100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ALEXANDRA ZADORYN,

INDEX NO.

Plaintiff,

-against-

INDIVIDUAL
VERIFICATION

CAB EASY LLC and NEIL GOLDBERG,

Defendants.

STATE OF NEW YORK)

) ss.:

COUNTY OF KINGS)

ALEXANDRA ZADORYN, being duly sworn, deposes and says:

That I am the plaintiff in the within action.

I have read the foregoing Summons and Complaint and know the contents thereof and the same is true to the best of my knowledge, except as to those matters herein stated to be alleged upon information and belief and that as to those matters, I believe them to be true.



ALEXANDRA ZADORYN

Sworn to before me this
12 day of February, 2015



NOTARY PUBLIC

LISANDRO DIAZ
Commissioner of Deeds
City of New York, 2-12584
Certificate filed in Kings County
Commission Expires December 01, 2017

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SUMMONS and VERIFIED COMPLAINT

LAW OFFICE OF BRIAN M. KING, P.C.
Attorneys for Plaintiff
ALEXANDRA ZADORYN
1400 Avenue Z, Suite 503
Brooklyn, NY 11235
(718) 942-5100
