

FAMILY COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK  
=====X  
ROY DEN HOLLANDER,

Docket No.: 0-03570/02

Petitioner,

**Respondent's Response  
to Petitioner's Notice for  
Discovery & Inspection  
and Interrogatories**

-against-

ALINA SHIPILINA,

Respondent.  
=====X

Pursuant to Article 31 of the CPLR and the Order Directing Discovery by the Honorable Helen C. Sturm, dated July 29, 2002, the Respondent, ALINA SHIPILINA, responds to the Petitioner's Notice for Discovery and Inspection, and Interrogatories, as set forth herein (for purposes of this response the answers contained herein shall correspond to the numbered questions as set forth in the Order dated July 29, 2002):

Document Requests

1. Without waiver of any rights to supplement this response up to and at the time of trial, Respondent states that she is not aware of any complaints Respondent filed with the New York City Police Department since January 1, 2002.

2. At this time, Respondent is not in possession of any originals or copies of telephone billing records for the numbers 718-274-4902 and 917-374-4713 for October 2001, February 2002, and March 2002. However, the

Respondent reserves her right to supplement such response up to and at the time of trial.

Interrogatories

1. Without waiver of any rights to supplement this response up to and at the time of trial, the Respondent denies information and/or knowledge with respect to the full name, age, residence and post office addresses, home telephone numbers, businesses addresses and business telephone numbers and occupation for the man who allegedly telephoned Petitioner on behalf of Respondent in October 2001 and left a voicemail at Petitioner's mobile telephone number.

2. Without waiver of any rights to supplement this response up to and at the time of trial, the Respondent denies information and/or knowledge with respect to the full name, age, residence and post office addresses, home telephone numbers, businesses addresses and business telephone numbers and occupation for the man who allegedly telephoned Petitioner on behalf of Respondent in February 2002 and left a voicemail at Petitioner's mobile telephone number.

3. Without waiver of any rights to supplement this response up to and at the time of trial, the Respondent denies information and/or knowledge with respect to the full name, age, residence and post office addresses, home telephone numbers, businesses addresses and business telephone numbers

and occupation for the man who allegedly telephoned Petitioner on behalf of Respondent in March 2002.

4. Without waiver of any rights to supplement this response up to and at the time of trial, the Respondent denies information and/or knowledge with respect to the relationship between the Respondent and the men who allegedly telephoned the Petitioner as alleged in Interrogatory item one, two and three of Interrogatory Set Two.

5. Without waiver of any rights to supplement this response up to and at the time of trial, the Respondent denies that she has had any conversations regarding the alleged telephone calls prior to the date of Petitioner's request for an Order of Protection.

Dated: July 31, 2002  
New York, New York

  
KUBA, MUNDY & ASSOCIATES  
By: Paulette DeTiberis, Esq.