

5. Denies the allegations contained in paragraph 1, except admit that Respondent is a domestic corporation in the State of New York.

6. Admits the allegations of paragraph 3.

7. As and for an answer to paragraphs 22 and 37, Respondent repeats and reiterates each and every answer to each and every one of the foregoing allegations herein, as if specifically set forth at length herein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

8. All or part of Complainant's claims may be barred by the applicable statute of limitations or by laches.

SECOND AFFIRMATIVE DEFENSE

9. The Complaint fails to state a cause of action upon which relief can be granted.

THIRD AFFIRMATIVE DEFENSE

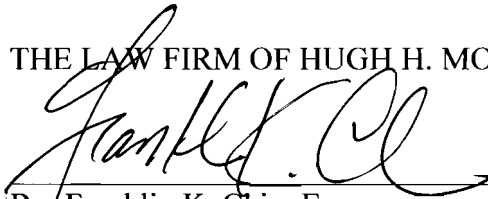
10. The Plaintiff's Complaint fails to state the bases of the causes of action contained therein with sufficient particularity and specificity.

FOURTH AFFIRMATIVE DEFENSE

attorneys' fees, costs and disbursements together with such other and further relief as is deemed necessary and just.

Dated: New York, New York
June 15, 2012

THE LAW FIRM OF HUGH H. MO, P.C.

A handwritten signature in black ink, appearing to read "Franklin K. Chiu", written over a horizontal line.

By: Franklin K. Chiu, Esq.

Attorneys for Respondent

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