


This Court has to decide whether it will let itself be manipulated and used as an instrument for New York lawyers to inconvenience and spew invective on foreign lawyers, without any basis in the law.

WHEREFORE, Respondent asks this Court to dismiss the Amended Complaint for lack of personal jurisdiction and to strike the Complaint and Amended Complaint, and to impose sanctions on opposing counsel and the lawyer who 'verified' the Complaint.

Dated: November 27, 2018


Respectfully Submitted,

  
Douglas Litowitz

State of Illinois     )  
                                  ) ss.  
County of Lake     )

**AFFIRMATION / VERIFICATION /AFFIDAVIT**

Now comes Douglas Litowitz of Deerfield, Illinois, and being duly sworn, states as follows: the facts set forth in the foregoing *pro se* Reply Affirmation are true to the best of my knowledge after diligent inquiry. The Complaint and Amended Complaint contain a great many falsehoods that could be easily refuted with reference to public records, and they contain other assertions with no legitimate legal purpose to state any claim, but merely for the shock and humiliation of revealing personal information about me. The legal claims by the Petitioners and Opposing Counsel have no basis in New York law or any good faith extension of such law.

  
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Douglas Litowitz  
Respondent

