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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

-----X  
 96 BROADWAY, LLC, MICHAEL MOLUS and )  
 DOUGLAS R. DOLLINGER, ESQ, )  
 Plaintiff(s), )  
 )  
 -against- )  
 )  
 MICHAEL GABOR, and JOHN and JANE DOES 1 )  
 through 50, )  
 Defendant(s). )  
 -----X

SUMMONS  
(Slander and Libel)

**2006 - 4378**

Index No: 06/  
Date purchased  
June 5, 2006

~~JUN~~ 5 2006

TO: MICHAEL GABOR, and JOHN and JANE DOES 1 through 50:

You are hereby summoned and required to serve upon plaintiff's attorney an answer to the complaint in this action within twenty (20) days after the service of summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

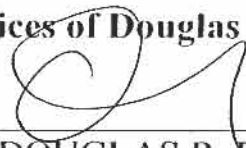
The basis of the venue designated is the place of occurrence. Plaintiffs designate Orange County as the place of trial.

Dated: June 5, 2006  
Newburgh, New York

Summons-Verified Complaint- Verification

Law Offices of Douglas R. Dollinger and Associates  
96 Broadway, City of Newburgh, Newburgh, New York 12550 \* 845.562.9601

**Law Offices of Douglas R. Dollinger and Associates**

  
By: DOUGLAS R. DOLLINGER, ESQ.

Attorney for Plaintiff(s)

96 Broadway

Newburgh, New York 12550

(845) 562-9601

**DEFENDANT'S ADDRESS:**

MICHAEL GABOR,

and JOHN and JANE DOES 1 through 50,

297 Grand Street

Newburgh, New York 12550

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COUNTY OF ORANGE

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DOUGLAS R. DOLLINGER, ESQ, )

Plaintiff(s), )

-against-

MICHAEL GABOR, and JOHN and JANE DOES 1 )  
through 50, )

Defendant(s). )  
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VERIFIED COMPLAINT  
(Slander and Libel)

2006 - 4376

Index No: 06/

Date purchased

June 5, 2006

JUN 5 2006

Plaintiff(s) complaining of the Defendant, MICHAEL GABOR and for  
causes of action allege as follows:

1. Plaintiff, MICHAEL MOLUS is an individual and is now, and at all  
times hereinafter mentioned in this complaint was, a resident of Palm Desert,  
Riverside County, California.

2. Plaintiff 96 Broadway, LLC is now, and at all times hereinafter  
mentioned in this complaint was, a corporation organized and existing under the  
laws of the State of New York.

3. Plaintiff, MICHAEL MOLUS is an investor and/or shareholder of 96  
Broadway LLC.

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4. Plaintiff, DOUGLAS R. DOLLINGER ("DOLLINGER") is an individual and is now, and at all times mentioned in this complaint was, a resident of Orange County, New York.

5. Defendant MICHAEL GABOR is an individual, was, is now, and at all times mentioned in this complaint a resident of Orange County, State of New York.

6. The true names of defendants DOES 1 through 50 inclusive, are unknown to plaintiff(s) at this time. Plaintiff sues those defendants by such fictitious names and is informed and believes, and based on that information and belief alleges, that each of the defendants designated as a DOE is legally responsible for the events and happenings referred to in this complaint, and unlawfully caused the injuries and damages to plaintiff(s) alleged in this complaint.

7. Plaintiff(s) are informed and believe, and based on that information and belief allege, that at all times mentioned in this complaint, each defendant was/were the agents and/or employees, members of an association-in-fact of each co-defendant MICHAEL GABOR and DOES 1-50 and in doing the things alleged in this complaint were acting within the course and scope of such agency and

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employment or other association-in-fact or are otherwise individually responsible for the claims of slander and libel.

8. Plaintiff, DOLLINGER is an attorney duly licensed to practice law in the State of New York.

9. Plaintiff DOLLINGER has worked as an attorney in this community and in Orange County, New York for in excess of 15 years.

10. Plaintiff DOLLINGER has during all this time enjoyed a good reputation, both generally and in his person and profession.

11. At all times hereinafter mentioned, Plaintiff, DOLLINGER was managing a certain renovation project located at 96 Broadway owned by 96 Broadway LLC (hereinafter the premises), City of Newburgh, Newburgh, New York, County of Orange, State of New York.

12. That at all times hereinafter mentioned 96 Broadway LLC paid for obtained and undertook reconstruction of the premises pursuant to a building permit lawfully issued by the City of Newburgh Building Department.

13. On or about June 3, 2006, defendant(s) made certain derogatory, false and otherwise misleading factual statements to members of the news media intending to injure the plaintiffs in their personal and business reputations and in their property concerning the issuance of said building permit.

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14. The statements so made referred to plaintiff(s) and were made of and concerning plaintiff(s), and was so understood by those who read said publication to be illegal acts committed by plaintiff(s) in so obtaining said building permit, including: "What's going on here is very, very wrong. And it so secretive" . . . . "We have people talking about favoritism or payoffs. That's how shady it is."

15. The entire statements was and is false as it pertains to plaintiff(s) and the defendants knew that said statements were false and otherwise intended to injure plaintiffs.

16. The newspaper article is libelous on its face. It clearly exposes plaintiff(s) to hatred, contempt, ridicule and obloquy because it charges plaintiff(s) with having committed and been part of a criminal act, inclusive of illegal payoffs in obtaining a building permit.

17. The newspaper article was seen and read on or about June 3, 2006, in the Times Herald Record in Orange County, New York by multiple members of the community.

18. As a proximate result of the above-described publication, plaintiff(s) have suffered loss of their reputation, shame, mortification, and injury to their feelings, all to their damage in the amount to be established by proof at trial.

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19. The above-described publication was not privileged because it was caused to be published by defendants with malice, hatred and ill will toward plaintiff(s) and the desire to injure them in that defendants had expressed a desire to stop the restoration and reconstruction on the build known as 96 Broadway.

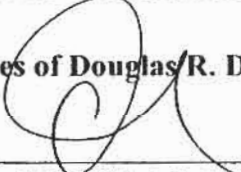
20. Because of defendants' malice in publishing said statements, plaintiff(s) seek punitive damages in a total amount to be established by proof at trial, but in no event to be less than Five Million Dollars (\$5,000,000.00) Dollars.

**WHEREFORE**, plaintiff(s) demands judgment against defendants, and each of them, for:

1. Compensatory damages according to proof;
2. Punitive damages;
3. Interest as allowed by law;
4. Costs of suit; and
5. Such other and further relief as this court may deem just and proper.

Dated: June 3, 2006

**Law Offices of Douglas R. Dollinger and Associates**

  
By: DOUGLAS R. DOLLINGER, ESQ.  
Attorney for Plaintiff(s)  
96 Broadway  
Newburgh, New York 12550  
(845) 562-9601

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