

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

-----X  
THERESA ACOCELLA,

Plaintiff,

Index No.:

-against-

SUMMONS

TATYANA ZAKHARENKO, and PLANNED  
PARENTHOOD HUDSON PECONIC, INC.,  
individually and doing business as PLANNED  
PARENTHOOD SPRING VALLEY CENTER,

Defendants.  
-----X

**To the above named Defendants:**

**You are hereby summoned** to answer the Verified Complaint in this action, and to serve a copy of your Answer, or if the Verified Complaint is not served with this Summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty (20) days after the service of this Summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within thirty (30) days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Verified Complaint.

Dated: New York, New York  
October 5, 2011

Suckle Schlesinger PLLC  
*Attorneys for Plaintiff*

By: \_\_\_\_\_

Howard A. Suckle  
224 West 35th Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

To:

TATYANA ZAKHARENKO  
25 Perlman Drive  
Spring Valley, New York 10977

PLANNED PARENTHOOD  
HUDSON PECONIC, INC.  
4 Skyline Drive,  
Hawthorne, New York 10532

PLANNED PARENTHOOD  
HUDSON PECONIC INC., d/b/a  
PLANNED PARENTHOOD  
SPRING VALLEY CENTER  
25 Perlman Drive  
Spring Valley, New York 10977

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

-----X  
THERESA ACOCELLA,

Plaintiffs,

-against-

Index No.:

TATYANA ZAKHARENKO, and PLANNED  
PARENTHOOD HUDSON PECONIC, INC.,  
individually and doing business as PLANNED  
PARENTHOOD SPRING VALLEY CENTER,

VERIFIED COMPLAINT

Defendants.  
-----X

The Plaintiff, THERESA ACOCELLA, by her attorneys, SUCKLE SCHLESINGER PLLC, as and for a Verified Complaint, alleges, upon information and belief, as follows:

**PARTIES**

1. Plaintiff, THERESA ACOCELLA, is a resident of the State of New York, County of Rockland.
2. That at all times mentioned herein, Defendant, TATYANA ZAKHARENKO, was, and still is, a nurse practitioner duly licensed to practice in the State of New York.
3. That at all times mentioned herein, Defendant, TATYANA ZAKHARENKO, was, and still is, a physician duly licensed to practice in the State of New York.
4. That at all times mentioned herein, Defendant, TATYANA ZAKHARENKO, practiced medicine at 25 Perlman Drive, Spring Valley, New York.
5. That at all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED

PARENTHOOD SPRING VALLEY CENTER, was, and still is, a domestic not-for-profit corporation organized and existing under and by virtue of the laws of the State of New York.

6. That at all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, maintained and still maintains a principal place of business located at 25 Perlman Drive, Spring Valley, New York.

7. Upon information and belief, at all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, was, and still is, the owner of a medical facility located at 25 Perlman Drive, Spring Valley, New York.

8. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, operated a medical facility at 25 Perlman Drive, Spring Valley, New York.

9. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, managed a medical facility at 25 Perlman Drive, Spring Valley, New York.

10. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, controlled a medical facility at 25 Perlman Drive, Spring Valley, New York.

11. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, employed physicians, nurse practitioners and/or staff members and others to treat and care for patients.

12. At all times herein, Defendant, TATYANA ZAKHARENKO, was employed by Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER.

13. At all times herein, Defendant, TATYANA ZAKHARENKO, was an agent of Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER.

14. At all times herein, Defendant, TATYANA ZAKHARENKO, was a licensee of Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER.

15. At all times herein, Defendant, TATYANA ZAKHARENKO, stood in a relationship with Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, in her care and treatment of patients, and in particular Plaintiff, THERESA ACOCELLA, herein, as to make Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, liable for the acts and omissions of Defendant, TATYANA ZAKHARENKO.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST  
DEFENDANT, TATYANA ZAKHARENKO: MEDICAL MALPRACTICE**

16. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through fifteen (15) as if more fully set forth herein.

17. At all times mentioned herein, Defendant, TATYANA ZAKHARENKO, held herself out to be a physician offering professional services to the public, in general, and to the Plaintiff.

18. At all times mentioned herein, Defendant, TATYANA ZAKHARENKO, held herself out to be a nurse practitioner offering professional services to the public, in general, and to the Plaintiff.

19. Upon information and belief, on or about April 29, 2009, Plaintiff presented to Defendant, TATYANA ZAKARENKO, at 25 Perlman Drove, Spring Valley, New York, for medical care and treatment.

20. At all times mentioned herein, Defendant, TATYANA ZAKHARENKO, represented that she was competent to perform and render all the medical care, treatment, services and advice required by the Plaintiff.

21. Upon information and belief, on or about April 29, 2009, Defendant, TATYANA ZAKHARENKO, undertook to and did render medical care, treatment, services and/or advice to the Plaintiff and/or prescribed, administered and/or provided medication to the Plaintiff.

22. The medical treatment rendered to Plaintiff, by Defendant, TATYANA ZAKHARENKO, was performed negligently and carelessly and was rendered in a manner

which departed from the standard of good and accepted medical and/or nurse practitioner practice then and there prevailing, and constituted medical and/or nurse practitioner malpractice.

23. Defendant, TATYANA ZAKHARENKO, was negligent in the care rendered to and on behalf of the Plaintiff in failing to use reasonable care in the services and care rendered to and on behalf of the Plaintiff; in negligently departing from good and accepted medical practice and procedures in services rendered to Plaintiff; in failing to heed or appreciate the significance of the signs and symptoms exhibited by Plaintiff; in improperly prescribing medication; in improperly administering medication; in improperly providing the Plaintiff with medication; in failing to timely refer Plaintiff to specialists; in failing to take a proper medical history of the Plaintiff; in failing to properly test the Plaintiff prior to prescribing, administering, and/or providing medication to the Plaintiff; and/or in otherwise being negligent, careless, and reckless in the diagnosis and treatment of Plaintiff. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.

24. As a result of the foregoing, Plaintiff was caused to sustain severe and permanent personal injuries, was caused to suffer severe pain and mental anguish, suffered conscious pain and suffering, was caused to expend and become obligated to expend sums of money for medical services and related expenses, and sustained damages, both general and special, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

25. Plaintiff's injuries were caused solely and wholly as a result of Defendant's negligence and departure from good and accepted medical and/or nurse practitioner practices,

customs, and standards in effect and use in the community of her practice without any negligence on the part of the Plaintiff contributing thereto. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.

**AS AND FOR A SECOND CAUSE OF ACTION AGAINST  
DEFENDANT, TATYANA ZAKHARENKO: LACK OF INFORMED CONSENT**

26. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through twenty-five (25) as if more fully set forth herein.

27. Defendant, TATYANA ZAKHARENKO, failed to disclose to and/or inform Plaintiff of the risks associated with the medications which Defendant, TATYANA ZAKHARENKO, prescribed, administered, and/or provided to the Plaintiff and of the alternatives thereto and the reasonably foreseeable risks and benefits associated therewith as a reasonable medical practitioner under similar circumstances would have disclosed, in a manner permitting said Plaintiff to make a knowledgeable evaluation.

28. Defendant's care and/or treatment of Plaintiff involved non-emergency treatment.

29. A reasonably prudent person in Plaintiff's position who had been fully informed would not have undergone the treatment and/or taken the medication prescribed, administered, and/or provided to the Plaintiff by Defendant, TATYANA ZAKHARENKO.

30. As a result of the foregoing, Plaintiff was caused to sustain severe and permanent personal injuries, was caused to suffer severe pain and mental anguish, suffered conscious pain and suffering, was caused to expend and become obligated to expend sums of money for medical services and related expenses, and sustained damages, both general and



special, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A THIRD CAUSE OF ACTION AGAINST  
DEFENDANT, TATYANA ZAKHARENKO: NEGLIGENCE**

31. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through thirty (30) as if more fully set forth herein.

32. On or about April 29, 2009, Defendant, TATYANA ZAKHARENKO, provided services, care, and/or treatment, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff.

33. On or about April 29, 2009, Defendant, TATYANA ZAKHARENKO, provided Plaintiff with services, care, and/or treatment, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff, at Planned Parenthood Spring Valley Center, located at 25 Perlman Drove, Spring Valley, New York.

34. At all times herein, Defendant, TATYANA ZAKHARENKO, was negligent in the services, care, and/or treatment, rendered to, and on behalf, of the Plaintiff, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff.

35. As a result of the foregoing, Plaintiff suffered permanent injuries and sustained severe and permanent personal injuries, suffered severe pain and mental anguish, suffered conscious pain and suffering, and was caused to expend, and become obligated to expend, sums of money for medical services and related expenses, and sustain damages, both general and special damages, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

36. Plaintiff's injuries were caused solely and wholly as a result of Defendant's negligence and without any negligence on the part of the Plaintiff contributing thereto. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.

**AS AND FOR A FOURTH CAUSE OF ACTION AGAINST DEFENDANT,  
PLANNED PARENTHOOD HUDSON PECONIC, INC., INDIVIDUALLY AND/OR  
DOING BUSINESS AS PLANNED PARENTHOOD SPRING VALLEY CENTER:  
MEDICAL MALPRACTICE**

37. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through thirty-six (36) as if more fully set forth herein.

38. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, held itself out to be an institution providing medical treatment to those persons in the need of same and/or offering medical services to the public, in general, and to the Plaintiff.

39. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, used and employed physicians, nurse practitioners and/or staff members and others, including Defendant, TATYANA ZAKHARENKO, who were employed, authorized, retained and/or permitted by Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, to render and/or provide all of the necessary and proper functions pertaining to medical care rendered and/or provided to patients cared for.

40. Upon information and belief, on or about April 29, 2009, Plaintiff presented to Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, for medical care and treatment.

41. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its partners, agents, servants, licensees, and/or employees represented themselves to be competent to perform and render all of the professional care, treatment, services and advice required by the Plaintiff.

42. Upon information and belief, on or about April 29, 2009, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its partners, agents, servants, licensees, and/or employees undertook to and did render medical care, treatment, services and advice to the Plaintiff.

43. The medical treatment rendered to Plaintiff, by Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its partners, agents, servants, licensees, and/or employees was performed negligently and carelessly and was rendered in a manner which departed from the standard of good and accepted medical and/or nurse practitioner practice then and there prevailing, and constituted medical and/or nurse practitioner malpractice.

44. Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its partners, agents, servants, licensees, and/or employees, were negligent in the care rendered to and on behalf of the Plaintiff in failing to use reasonable care in the services and care rendered to and on behalf of the Plaintiff; in negligently departing from good and accepted medical practice and procedures in services rendered to Plaintiff; in failing to heed or appreciate the significance of the signs and symptoms exhibited by Plaintiff; in improperly prescribing medication; in improperly administering medication; in improperly providing the Plaintiff with medication; in failing to timely refer Plaintiff to specialists; in failing to take a proper medical history of the Plaintiff; in failing to properly test the Plaintiff prior to prescribing, administering, and/or providing medication to the Plaintiff; and/or in otherwise being negligent, careless, and reckless in the diagnosis and treatment of Plaintiff. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.

45. As a result of the foregoing, Plaintiff was caused to sustain severe and permanent personal injuries, was caused to suffer severe pain and mental anguish, suffered conscious pain and suffering, was caused to expend and become obligated to expend sums of money for medical services and related expenses, and sustained damages, both general and special, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

46. Plaintiff's injuries were caused solely and wholly as a result of the negligence of the Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its partners,

agents, servants, licensees, and/or employees, and their departure from good and accepted medical practices, customs, and standards in effect and use in the community of their practice without any negligence on the part of the Plaintiff contributing thereto. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.

**AS AND FOR A FIFTH CAUSE OF ACTION AGAINST DEFENDANT,  
PLANNED PARENTHOOD HUDSON PECONIC, INC., INDIVIDUALLY AND/OR  
DOING BUSINESS AS PLANNED PARENTHOOD SPRING VALLEY CENTER:  
LACK OF INFORMED CONSENT**

47. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through forty-six (46) as if more fully set forth herein.

48. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, held itself out to be an institution providing medical treatment to those persons in the need of same and/or offering medical services to the public, in general, and to the Plaintiff.

49. At all times mentioned herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, used and employed physicians, nurse practitioners and/or staff members and others, including Defendant, TATYANA ZAKHARENKO, who were employed, authorized, retained and/or permitted by Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, to render and/or provide all of

the necessary and proper functions pertaining to medical care rendered and/or provided to patients cared for.

50. Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO, failed to disclose to and/or inform Plaintiff of the risks associated with the medications which Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO, prescribed, administered, and/or provided to the Plaintiff and of the alternatives thereto and the reasonably foreseeable risks and benefits associated therewith as a reasonable medical practitioner under similar circumstances would have disclosed, in a manner permitting said Plaintiff to make a knowledgeable evaluation.

51. Defendant PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, and its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO's care and/or treatment of Plaintiff involved non-emergency treatment.

52. A reasonably prudent person in Plaintiff's position who had been fully informed would not have undergone the treatment and/or taken the medication prescribed, administered, and/or provided to the Plaintiff by Defendant, PLANNED PARENTHOOD HUDSON

PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO.

53. As a result of the foregoing, Plaintiff was caused to sustain severe and permanent personal injuries, was caused to suffer severe pain and mental anguish, suffered conscious pain and suffering, was caused to expend and become obligated to expend sums of money for medical services and related expenses, and sustained damages, both general and special, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SIXTH CAUSE OF ACTION AGAINST DEFENDANT,  
PLANNED PARENTHOOD HUDSON PECONIC, INC., INDIVIDUALLY  
AND/OR DOING BUSINESS AS PLANNED PARENTHOOD SPRING  
VALLEY CENTER: NEGLIGENCE**

54. Plaintiff repeats, reiterates and realleges each and every allegation set forth in paragraphs one (1) through fifty-four (54) as if more fully set forth herein.

55. On or about April 29, 2009, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO, provided services, care, and/or treatment, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff.

56. On or about April 29, 2009, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED

PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO, provided Plaintiff with services, care, and/or treatment, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff, at Planned Parenthood Spring Valley Center, located at 25 Perlman Drove, Spring Valley, New York.

57. At all times herein, Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., individually and/or doing business as PLANNED PARENTHOOD SPRING VALLEY CENTER, its physicians, nurse practitioners and/or staff members and/or others, including Defendant, TATYANA ZAKHARENKO, were negligent in the services, care, and/or treatment, rendered to, and on behalf, of the Plaintiff, including, but not limited to, prescribing, administering, and/or providing medication to the Plaintiff.

58. As a result of the foregoing, Plaintiff suffered permanent injuries and sustained severe and permanent personal injuries, suffered severe pain and mental anguish, suffered conscious pain and suffering, and was caused to expend, and become obligated to expend, sums of money for medical services and related expenses, and sustain damages, both general and special damages, in a sum which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction.

59. Plaintiff's injuries were caused solely and wholly as a result of Defendant's negligence and without any negligence on the part of the Plaintiff contributing thereto. At the time of trial, Plaintiff will also rely upon the doctrine of Res Ipsa Loquitur.



**WHEREFORE**, Plaintiff demands judgment on each of the causes of action against the Defendants in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction over this action, together with interest, costs and disbursements, and such other and further relief, this Court deems just and proper.

Dated: New York, New York  
October 5, 2011

Yours, etc.,

**Suckle Schlesinger PLLC**  
*Attorneys for Plaintiff*

By: 

Howard A. Suckle  
224 West 35<sup>th</sup> Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

-----X  
THERESA ACOCELLA,

Plaintiff,

Index No.:

-against-

CERTIFICATE OF MERIT

TATYANA ZAKHARENKO, and PLANNED  
PARENTHOOD HUDSON PECONIC, INC.,  
individually and doing business as PLANNED  
PARENTHOOD SPRING VALLEY CENTER,

Defendants.  
-----X

**HOWARD A. SUCKLE**, being a member of the firm of Suckle Schlesinger  
PLLC, the attorneys for the Plaintiff in the within action, certifies pursuant to CPLR §  
3012-a, that he has reviewed the facts of the case and consulted with at least one  
physician who is licensed to practice in this State and who he reasonably believes to be  
knowledgeable in the relevant issues involved in this action, and that he had concluded  
upon the basis of such review and consultation that there is a reasonable basis for the  
commencement of this action.

Dated: New York, New York  
October 5, 2011

**Suckle Schlesinger PLLC**  
*Attorneys for Plaintiff*

By: 

Howard A. Suckle  
224 West 35th Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

**VERIFICATION**

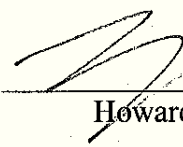
STATE OF NEW YORK    )  
                                  ) ss.:  
COUNTY OF NEW YORK )

HOWARD A. SUCKLE, an attorney admitted to practice in the State of New York, affirms the following under the penalties of perjury:

1. That I am a member of the law firm of SUCKLE SCHLESINGER PLLC, attorneys for the Plaintiff herein.
2. That the foregoing COMPLAINT is true to the knowledge of affirmant, except as to those matters therein stated to be alleged upon information and belief, and that as to those matters, I believe them to be true.
3. The grounds as to matters stated upon information and belief are the results of investigations and information received while acting as an attorney.

Affirmant further states that the reason this verification is made by affirmant and not by Plaintiff is that the Plaintiff is not within the County of New York, where affirmant maintains his office.

Dated:             New York, New York  
                      October 5, 2011

  
\_\_\_\_\_  
Howard A. Suckle

NOTICE OF ENTRY

PLEASE take notice that the within is a (certified) true copy of a duly entered in the office of the clerk of the within named court on

Dated,

Yours etc.,

SUCKLE SCHLESINGER PLLC

Attorney(s) for

224 West 35<sup>th</sup> Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

To:

Attorney(s) for

NOTICE OF SETTLEMENT

PLEASE take notice that an order

of which the within is a true copy will be presented for settlement to the Hon.

one of the judges of the within named Court, at

on \_\_\_\_\_ 2000

at \_\_\_\_\_ M.

Dated,

Yours etc.,

SUCKLE SCHLESINGER PLLC

Attorney(s) for

224 West 35<sup>th</sup> Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

To:

Attorney(s) for

Index No.:

**SUPREME COURT STATE OF NEW YORK  
COUNTY OF ROCKLAND**

**THERESA ACCOCELLA,**

Plaintiff,

-against-

**TATYANA ZAKHARENKO, and PLANNED  
PARENTHOOD HUDSON PECONIC, INC.,  
individually and doing business as PLANNED  
PARENTHOOD SPRING VALLEY CENTER,**

Defendants.

**SUMMONS  
VERIFIED COMPLAINT  
&  
CERTIFICATE OF MERIT**

**SUCKLE SCHLESINGER PLLC**  
*Attorneys for Defendants*

224 West 35<sup>th</sup> Street, Suite 1200  
New York, New York 10001  
(212) 226-4200

To:

Attorney(s) for

Service of the within

is hereby admitted

Dated,