

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X  
SIGNATURE BANK,

Plaintiff,

-against-

MARY J. BLIGE, MARTIN ISAACS and  
MARY JANE PRODUCTIONS, INC.,Defendants.  
-----X

: Index No. 654123/2012

: **VERIFIED ANSWER**

Defendants Mary J. Blige ("Blige"), Martin Isaacs ("Isaacs"), and Mary Jane Productions, Inc. (collectively, "Defendants"), by and through their attorneys, Jonathan D. Davis, P.C., for their response to the Verified Complaint, dated November 28, 2012 (the "Complaint"), deny each and every allegation not specifically admitted in this answer and state to each correspondingly numbered paragraph of the Complaint as follows:

1. Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 1 of the Complaint.
2. Defendants admit the allegations in paragraph 2 of the Complaint.
3. Defendants admit the allegations in paragraph 3 of the Complaint.
4. Defendants admit the allegations in paragraph 4 of the Complaint.
5. Paragraph 5 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 5 of the Complaint.
6. Paragraph 6 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations in paragraph 6 of the Complaint.

7. Paragraph 7 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 7 of the Complaint.

8. Paragraph 8 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 8 of the Complaint.

#### **RESPONSE TO PURPORTED BACKGROUND**

9. Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 9 of the Complaint except admit that Blige and Isaacs executed a Promissory Note (the "Note") with Signature in the amount of \$2,200,000.00, and respectfully refer the Court to that document for its true, accurate, and complete contents.

10. Paragraph 10 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 10 of the Complaint, but admit the Maturity Date is identified as July 16, 2012 in the Note and that an amount remains unpaid under the Note.

11. Paragraph 11 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 11 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete

contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

12. Paragraph 12 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 12 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

#### **RESPONSE TO FIRST CAUSE OF ACTION**

13. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 2, 5, 7, and 9 through 12 of the Complaint as if set forth at length herein.

14. Paragraph 14 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 14 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

#### **RESPONSE TO SECOND CAUSE OF ACTION**

15. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 3, 6, 8, and 9 through 12 of the Complaint as if set forth at length herein.

16. Paragraph 16 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 16 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

### **RESPONSE TO THIRD CAUSE OF ACTION**

17. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 2, 5, 7, and 9 through 14 of the Complaint as if set forth at length herein.

18. Paragraph 18 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 18 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

19. Paragraph 19 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 19 of the Complaint.

### **RESPONSE TO FOURTH CAUSE OF ACTION**

20. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 3, 6, 8, 9 through 12, 15, and 16 of the Complaint as if set forth at length herein.

21. Paragraph 21 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 21 of the Complaint, and respectfully refer the Court to the Note for its true, accurate, and complete contents. Defendants Blige and Isaacs aver that payments have been made to Plaintiff since the filing of this action.

22. Paragraph 22 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 22 of the Complaint.

### **RESPONSE TO FIFTH CAUSE OF ACTION**

23. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 4, and 9 through 12 of the Complaint as if set forth at length herein.

24. Paragraph 24 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 24 of the Complaint, except admit that Mary Jane Productions, Inc. executed a Continuing Guaranty (the "Guaranty"), and respectfully refer the Court to the Guaranty for its true, accurate, and complete contents.

25. Paragraph 25 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 25 of the Complaint, and respectfully refer the Court to the Guaranty for its true, accurate, and complete contents.

26. Paragraph 26 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 26 of the Complaint, and respectfully refer the Court to the Note and the Guaranty for their true, accurate, and complete contents.

### **RESPONSE TO SIXTH CAUSE OF ACTION**

27. Defendants repeat and reiterate their responses to each of the allegations in paragraphs 1, 4, 9 through 12, and 23 through 26 of the Complaint as if set forth at length herein.

28. Paragraph 28 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 28

of the Complaint, and respectfully refer the Court to the Guaranty for its true, accurate, and complete contents.

29. Paragraph 29 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in paragraph 29 of the Complaint.

#### **FIRST DEFENSE**

30. The claims alleged in the Complaint are barred to the extent that any alleged obligations under the Note are subject to any prior, subsequent, or concurrently executed agreements between Plaintiff and any Defendant.

#### **SECOND DEFENSE**

31. The claims alleged in the Complaint are barred to the extent that any alleged obligations under the Guaranty are subject to any prior, subsequent, or concurrently executed agreements between Plaintiff and any Defendant.

#### **THIRD DEFENSE**

32. Defendants Blige and Isaacs have paid to Plaintiff sums that Plaintiff claims it is owed under the Note.

#### **FOURTH DEFENSE**

33. The claims alleged in the Complaint are barred to the extent that Plaintiff failed to comply with any requirements or obligations imposed under law, the Note or the Guaranty to enforce any of its rights.

#### **FIFTH DEFENSE**

34. Defendants will rely upon any and all other further defenses that become available or appear during discovery proceedings in this action and hereby specifically reserve the right to amend their Answer for the purposes of asserting any such additional affirmative defenses.



WHEREFORE, Defendants demand judgment, as follows:

- (a) Dismissing the Complaint in its entirety;
- (b) Granting such other and further relief as this Court deems just and proper.

Dated: September 25, 2013  
New York, New York

JONATHAN D. DAVIS, P.C.



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

Jonathan D. Davis, Esq.  
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New York, NY 10016  
(212) 687-5464  
*Attorneys for Defendants*

**VERIFICATION**


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

I have read the foregoing Verified Answer and know its contents. The factual matters in the Verified Answer are, to my knowledge, true. In addition, I believe the factual matters stated upon information and belief to be true.

  
MARY J. BLIGE

Sworn before me this

25<sup>th</sup> day of September 2013.



JONATHAN D. DAVIS  
Notary Public, State of New York  
No. 31-4007620  
Qualified in New York County  
Term Expires ~~March 30, 14~~  
8/31/14