

2. The agreement involved Counterclaimant coming to agreement with Plaintiff to tear down the structures located at 35 Avenue A, Bayonne, New Jersey, 07002, Block 360, Lot 1, Block 361 Lot 12, Block 362, Lot 3, Block 332, Lots 2, 2.01, 4 and 5.

3. The agreement was made in or about November, 2021 and involved the complete teardown to be completed within 2 months or on or about the 1st of the year , January, 1, 2022.

4. Instead of honoring the agreement which was never reduced to a written form of contract, Plaintiff instead took over Counterclaimant's land for its own benefit.

5. Instead of engaging in a 2 month construction project to tear down the structures, Plaintiff utilized the value of Counterclaimant's land and forcibly occupied same to further its unrelated business purposes.

6. More specifically, the value of Counterclaimant's land increased exponentially during the time of the agreement with Plaintiff.

7. The fair market rental value became at least, \$50,000 per month as a conservative valuation.

8. Upon information and belief, Plaintiff operated a waste management garbage contractor company unrelated to its agreement and business with Counterclaimant.

9. Counterclaimant noticed, and has evidence of (which will be provided in due course during the discovery process) Plaintiff parking more than 30 of its trailers related to its waste management business at Counterclaimant's property.

10. It became clear that Plaintiff utilized Counterclaimant's property, which has at least a \$50,000 a month fair market rental value, for its benefit without paying anything to Counterclaimant all while using its agreement to perform the construction work as a guise.

11. Indeed Plaintiff came up with excuse after excuse and took more than 2 years to perform the 2 months work all while utilizing the land for free.

12. Additionally, Counterclaimant had purchase the land at over \$15,000,000 which involved the payment of \$200,000 a month interest during the time of construction.

13. Each month beyond the agreed upon 2 months cost Counterclaimant \$200,000 a month in damages as it could not commence its project until the teardown was completed.

14. Thus, Counterclaimant was damaged \$50,000 a month in damages under the quantum meruit legal theory x 26 months = \$1,300,000.00.

15. Additionally, Counterclaimant was damaged \$200,000 a month in interest payments it was making that it should not have had to have made. Under the legal theory of consequential damages, \$200,000/month x 24 months (2 months were agreed to) = \$4,800,000.00.

16. Thus, the damages are immense, will be pleaded in more detail during the discovery process, and are conservatively and are estimated to exceed \$6,100,000.00.

WHEREFORE, Counterclaimant demands judgment against Plaintiffs for damages together with attorneys' fees, interest, and cost of suit.

SECOND COUNT

Unjust Enrichment

1. Counterclaimant repeats and reiterates each and every paragraph contained in the previous count as if set forth at length herein.

2. Pursuant to the allegations hereinabove and below, Plaintiff was unjustly enriched at the expense of the Counterclaimant.

3. Plaintiff used the Counterclaimant's land for free when the fair market value was \$50,000 a month as set forth hereinabove. Same was done under false pretense.
4. The Plaintiff's actions clearly constituted unjust enrichment.
5. Plaintiff unjustly enriched itself at the expense of Counterclaimant in the sum of at least \$1,300,000.00.
6. Counterclaimant suffered tangible and ascertainable losses as a direct result of Plaintiffs fraudulent and deceptive business practices.

WHEREFORE, Counterclaimant demands judgment against Plaintiff, for damages together with attorneys' fees, interest, and cost of suit. Additionally, for treble damages.

THIRD COUNT

Forgery/Fraud

1. Plaintiff in its complaint attached hereto attaches alleged written contracts between Plaintiff and Counterclaimant.
2. Same alleged contracts are fictitious.
3. Specifically, the alleged signautres of Counterclaimant are not his signature.
4. Counterclaimant never signed these documents.
5. These documents are fake, fraudulent documents that involve a forgery of Counterclaimant's signature.
6. Thus, Plaintiff committed the act of forgery.
7. Thus, Plaintiff are guilty of civil forgery under New Jersey law.

WHEREFORE, Counterclaimant demands judgment against Plaintiff, for damages together with attorneys' fees, interest, and cost of suit.

GEIST LAW LLC

Attorneys for DEFENDANT
COUNTERCLAIMANT GAMAL
GROUP CORPORATION

BY: _____
Jared Geist, ESQ.

JURY DEMAND

Pursuant to R. 1:8-2(b), Plaintiff hereby demands a Trial by Jury on all the issues raised in the within Pleadings.

GEIST LAW LLC

Attorneys for DEFENDANT
COUNTERCLAIMANT GAMAL GROUP
CORPORATION

BY: _____
Jared A. Geist, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Jared Geist, is designated as trial counsel.

TIME UNIT RULE

Plaintiff(s) intend to use the Time Unit Rule Pursuant to R. 1:7-1(b).

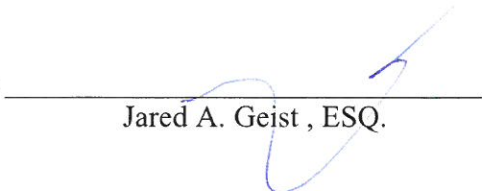
CERTIFICATION

I hereby certify that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any such action or proceeding presently contemplated.

GEIST LAW LLC
Attorneys for DEFENDANT
COUNTERCLAIMANT GAMAL GROUP
CORPORATION

BY: _____

Jared A. Geist , ESQ.



DEMAND FOR ANSWERS TO UNIFORM AND SUPPLEMENTAL
INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to Rule 4:17-1(b)(ii)(2), Plaintiff hereby demands answers to **Uniform Interrogatories Form C and Form C(1)** within sixty (60) days of the filing of Defendants' Answer to this Complaint.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 4:17-1(b)(i)(1) and Rule 4:17-2, Plaintiff hereby demands answers to the **Supplemental Interrogatories** within sixty (60) days of the filing of Defendant's Answer to this Complaint.

B. If any document called for by these requests is withheld on the ground that it is privileged, constitutes attorney work product, or is for any other reason exempt from discovery, set forth the ground or grounds for withholding such document, its present location and custodian and such additional information as may be required to enable it to be identified and to enable the Court to adjudicate the propriety of the withholding, including but not limited to the type of documents, its date, author(s), addressee(s), if different its recipient(s), and its general subject matter.

C. Documents produced in response to these requests shall be produced in such a manner so as to identify the specific request to which they relate.

D. As used herein, the term "document" means, by way of illustration and not by way of limitation, the following items, whether printed or records or reproduced by any other mechanical process, written produced by hand, produced or stored in a computer, regardless of origin or location: books, records, communications, reports, correspondence, letters, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, applications, booklets, brochures, catalogues, circulars, magazines, pamphlets, periodicals, bulletins, instructions, minutes, other communications (including, but not limited to, inter- and intra-office communications), purchase orders, bills of lading, bid tabulations, questionnaires, surveys, contracts, agreements, options to purchase, memoranda of agreements, licenses, books of account, orders invoices, statements, bills, checks, vouchers, ledger sheets, accounts, journals, canceled checks, bank statements, bank passbooks, confirmations, statements of accounts, analysis, diaries, graphs, notebooks, charts, tables, working papers, plans, indices, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of accountants or consultants, data sheets, data processing cards, photographs, photographic negatives, phono-records, tape recordings, discs, wire recordings, transcripts of recordings, drawings, motion picture film, advertisements, press releases, drafts, and marginal comments appearing on any such documents, all other written or printed matter of any kind or any other and all other data compilations from which information can be obtained and translated if necessary.

E. As used herein, the term, "person" means an individual, firm, partnership, corporation, proprietorship, association, governmental body, or any other organization or entity.

F. As used herein, any term in the singular shall be deemed to include the plural where appropriate and vice versa.

G. As used herein, all terms including "and" and "or" shall be construed either conjunctively or disjunctively as required by the context to include the response any document that might be deemed nonresponsive by any other construction.

H. As used herein, "communication" means any written or verbal communication or other statement from one person to another, including, but not limited to, any letter, interview, conference, meeting or telephone conversation.

DOCUMENTS TO BE PRODUCED:

1. All captions and docket numbers of every action that Defendants' have ever been a party to, including pending actions.
2. Any and all written statements, as well as oral statements reduced to writing, of all Plaintiff(s).
3. Any and all written statements, as well as oral statements reduced to writing, of the Defendants'.
4. Any and all written statements, as well as oral statements reduced to writing, of any and all other parties to this action.
5. Any and all statements, as well as oral statements reduced to writing, of any/all agents, servants and employees of Defendants', which in any way involve and/or discuss the Plaintiff(s), and/or the subject incident. If you claim these documents are "privileged" you must identify the statement including the date given and the individuals involved who gave and took the statement.
6. Any and all written statements or oral statements reduced to writing of any/all witnesses to any aspects of the incident complained of, as well as of any aspects of Plaintiff's claims.
7. Any and all Central Index Bureau and/or Index System Reports regarding the Plaintiff.
8. Copies of all videos, photographs, motion pictures, charts, sketches, illustrations, diagrams and/or pictures relating to the incident complained of, as well as any and all aspects of Plaintiff's claim.
9. Copy of these Defendant' "filed" Answers.
10. Copies of any and all subpoenas served by these Defendants in this matter.
11. Copies of all documents and any other information obtained through subpoenas, and/or authorizations signed by the Plaintiff's.
12. Copies of all documents and any other information obtained from any of Plaintiff's associates, acquired by way of subpoena(s) and/or by any other means.

13. Copies of all discovery propounded upon all other parties (other than the Plaintiffs).

14. Copies of all discovery received from all other parties (other than the Plaintiffs).

15. Copies of any and all written reports and/or oral reports reduced to writing, which in any way concerns the subject incident, and/or any/all claims of the Plaintiff, made to/by a police official/department and/or any governmental authority.

16. Any and all photographs, charts, drawings, motion pictures, videos and/or surveillance reports of the Plaintiff(s).

17. Copy of the Curriculum Vitae of each proposed expert witness of this Defendants'.

19. Any and all intake sheets, patient questionnaire forms or other documents filled out and/or completed or drafted pursuant to any and all defense examinations of the Plaintiff, taken or to be taken in this matter.

20. Clear and complete copies of any and all reports of any and all defense experts, whether or not intended to be called at the time of trial.

21. Pursuant to R. 4:17-4(c), copies of Answers to the Defendant's Interrogatories by all other parties.

22. Any and all correspondence, as well as oral communications reduced to writing, between Defendants' and any other party to this action.

23. Any and all written reports or oral reports reduced to writing that include whether Defendants' or anyone on behalf of Defendants' have knowledge of any lawsuit(s) made by the Defendant(s), either prior to or subsequent to the date of the complaint, and attach a copy of all written documents relating thereto that are in the possession of these Defendants'.

24. Any and all documents regarding or relating to any other injuries, illnesses, medical conditions and/or psychiatric conditions sustained by the Defendant (s), whether before or after the date of the complaint.

25. Any and all documents in your possession, custody and/or control that refer or relate in any way to reservation of rights from this Defendants' insurance company.

26. Any and all documents, including but not limited to, incident reports, photographs, tape recordings, films, videotapes, motion pictures, diagrams and/or sketches in your possession, custody and/or control that refer or relate in any way to circumstances surrounding the subject complaint.

27. Any and all documents, including but not limited to, photographs, videos, films, diagrams and/or sketches in your possession, custody and/or control that refer or relate in any way to Defendants' physical condition before or after the date of the complaint .

28. Any and all written reports, oral recordings, and/or oral reports reduced to writing at all regarding the subject incident and/or circumstances relating to the subject incident, made by Defendants' and/or by any servant, agent and/or employee of the Defendant(s). If you claim these documents are "privileged" you must identify the statement including the date given and the individuals involved who gave and took the statement.

29. Name and address of each agent, servant and/or employee of the Defendant(s), and/or of Defendant's insurance company and/or insurance broker and/or insurance agent, who spoke with any of the Defendants' at any time since the moment of the incident complained of, and the dates and time of said conversations, and whether or not said conversation(s) were in person or over the telephone, and who initiated the call or contact, and how this person received notice of the said incident. If you claim these documents are "privileged" you must identify the statement including the date given and the individuals involved who gave and took the statement.

30. True copies of any and all investigative reports pertaining to the subject incident.

31. Any and all records, reports, and/or other documents upon which this Defendants' will rely upon at the time of trial.

GEIST LAW LLC
Attorneys for DEFENDANT COUNTERCLAIMANT
GAMAL GROUP CORPORATION

BY: _____


Jared A. Geist, ESQ.