

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DARRYL CHADWICH CARTER,

Plaintiff,

Case No: 25-cv-02095-LDH-MMH

ANSWER

-against-

CAMBA HOUSING VENTURES, INC.;
SHINDA MANAGEMENT CORPORATION;
CAMBA, INC., DOES 1-10;

Defendants.

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Defendants CAMBA HOUSING VENTURES, INC., SHINDA MANAGEMENT CORPORATION and CAMBA, INC. (collectively, "Answering Defendants"), by and through their attorneys, BAKER GREENSPAN & BERNSTEIN, ESQS., as and for their Answer to the Plaintiff's Complaint, respectfully allege, upon information and belief, as follows:

1. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "1" of the Complaint.
2. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "2" of the Complaint.
3. Deny each and every allegation contained in Paragraph "3" of the Complaint and respectfully refer all questions of law to the Honorable Court for Adjudication.
4. Admit the allegations contained in Paragraph "4" of the Complaint.
5. Deny the allegations set forth in Paragraph "5" of the Complaint.
6. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "6" of the Complaint.
7. Deny the allegations set forth in Paragraph "7" of the Complaint.

8. Deny the allegations set forth in Paragraph “8” of the Complaint.
9. Deny the allegations set forth in Paragraph “9” of the Complaint.
10. Deny the allegations set forth in Paragraph “10” of the Complaint.
11. Deny the allegations set forth in Paragraph “11” of the Complaint.
12. Deny the allegations set forth in Paragraph “12” of the Complaint.
13. Deny the allegations set forth in Paragraph “13” of the Complaint.
14. Plaintiff made no allegations or claims against Answering Defendants in Paragraph “14” of the Complaint, and therefore, Answering Defendants are not required to specifically respond to same.
15. Defendants repeat and reallege the responses contained in Paragraphs “1” through “14” of the Complaint.
16. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph “16” of the Complaint.
17. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph “17” of the Complaint.
18. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph “18” of the Complaint.
19. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph “19” of the Complaint.
20. Deny knowledge or information sufficient to form a belief as to the allegations contained in Paragraph “20” of the Complaint.
21. Deny the allegations set forth in Paragraph “21” of the Complaint.
22. Deny the allegations set forth in Paragraph “22” of the Complaint.

23. Deny the allegations set forth in Paragraph “23” of the Complaint.
24. Deny the allegations set forth in Paragraph “24” of the Complaint.
25. Plaintiff made no allegations or claims against Answering Defendants in Paragraph “25” of the Complaint, and therefore, Answering Defendants are not required to specifically respond to same.
26. Defendants repeat and reallege the responses contained in Paragraphs “1” through “25” of the Complaint.
27. Plaintiff made no allegations or claims against Answering Defendants in Paragraph “27” of the Complaint, and therefore, Answering Defendants are not required to specifically respond to same.
28. Deny the allegations set forth in Paragraph “28” of the Complaint.
29. Deny the allegations set forth in Paragraph “29” of the Complaint.
30. Deny the allegations set forth in Paragraph “30” of the Complaint.
31. Deny each and every allegation contained in Paragraph “31” of the Complaint and respectfully refer all questions of law to the Honorable Court for Adjudication.
32. Deny the allegations set forth in Paragraph “32” of the Complaint.
33. Deny the allegations set forth in Paragraph “33” of the Complaint.
34. Plaintiff made no allegations or claims against Answering Defendants in Paragraph “34” of the Complaint, and therefore, Answering Defendants are not required to specifically respond to same.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

35. The Complaint fails to state a claim upon which relief can be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

36. The Complaint is barred by the applicable statute(s) of limitations.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

37. The Complaint is barred as the Plaintiff lacks standing and/or mental capacity to bring this suit.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

38. The Plaintiff has failed to name all necessary and indispensable parties in the Complaint.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

39. The Complaint is barred as the Plaintiff lacks personal jurisdiction over Answering Defendants.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

40. The Complaint is barred due to subject matter jurisdiction.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

41. Plaintiff's claims are barred by the doctrine of res judicata

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE

42. The Plaintiff's Complaint and/or causes of action are barred due to improper service of process.

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

43. Answering Defendants reserve their right to plead additional affirmative defenses as they become known.

WHEREFORE, Answering Defendants request judgment dismissing the Complaint in its entirety; and awarding defendants legal fees, costs and disbursements of this action, and for such other and further relief as the Court may deem just and proper.

Dated: Bellmore, New York
May 6, 2025

/s/ Evan Richards
Evan E. Richards, Esq. (ER 8382)
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