

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE METROPOLITAN MUSEUM OF ART AND  
Lester Marks, as Attorney in Fact for JAN COWLES,  
pursuant to a durable Power of Attorney dated April 21,  
2004,

11 Civ. 3143 (DLC)

Plaintiffs,

v.

SAFFLANE HOLDINGS, LTD. AND ROBERT  
WYLDE,

Defendants.

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**PLAINTIFF JAN COWLES’S ANSWER AND AFFIRMATIVE DEFENSES TO  
DEFENDANTS’ COUNTERCLAIM**

Plaintiff Jan Cowles, by and through Lester Marks, as Attorney-in-Fact, pursuant to a Durable Power of Attorney dated April 21, 2004 (“Cowles”), by and through her undersigned counsel, as and for her Answer to Defendants Safflane Holdings, Ltd. and Robert Wylde’s First Counter-Claim against Jan Cowles (the “Counter-Claim”) states as follows:

1. Paragraph 1 states a legal position to which no response is required.

2-54. Paragraphs 2-54 set forth responses to allegations in the Complaint, and are not affirmative allegations in support of any counterclaim to which any response is required.

55. The allegations in paragraph 55 inaccurately purport to “repeat and re-allege all of the foregoing allegations” when there are no foregoing affirmative allegations in support of any counterclaim. To the extent paragraph 55 purports to set forth any affirmative allegations (including, without limitation, any allegations that are inappropriately set forth in any purported “affirmative defenses”), those allegations are generally denied.



TO: Aaron Richard Golub, Esquire, P.C.  
*Attorneys for Safflane Holdings Ltd. and Robert Wylde*  
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**CERTIFICATE OF SERVICE**


I, Elizabeth L. Friedman, hereby certify that on August 8th, 2011, I served a true copy of the foregoing PLAINTIFF JAN COWLES'S ANSWER AND AFFIRMATIVE DEFENSES TO DEFENDANTS' COUNTERCLAIM by electronic filing upon:

Aaron Richard Golub, Esquire, P.C.  
*Attorneys for Safflane Holdings Ltd. and Robert Wylde*  
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Dated: New York, New York  
August 8, 2011

  
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Elizabeth L. Friedman