

STATE OF NEW YORK
COUNTY OF RENSSELAER SUPREME COURT

OFFICE OF
RENSSELAER CNTY CLERK

Charles E. Collins, III,
Plaintiff,

2010 SEP -8 PM 2:22

FRANK J. MEROLA

- against -

VERIFIED ANSWER

Yodle, Inc., Scott Long and
Brad Leitch,

Index No.: 233271

Defendants.

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

Charles E. Collins, III, being duly sworn, deposes and says:

1. That I am the plaintiff in the above entitled proceeding and make this Verified Answer in repsonse to the defendant's Verified Answer which was labeled a "Verified Answer" but was in reality a verified answer and cross petition.

2. Plaintiff is a pro se litigant and, as such, is not held to the same standards of drafting pleadings expected of attorneys, see Eileen W. v. Mario A., 644 N.Y.S.2d 452, note 9 (1996).

AS TO THE DEFENDANTS' COUNTERCLAIMS

3. Plaintiff admits paragraph "65".

4. Plaintiff denies paragraphs "67", "68", "69", "70", "71", "72", "73" and "74".

5. Plaintiff has insufficient knowledge to admit or deny paragraphs "64" and "66".

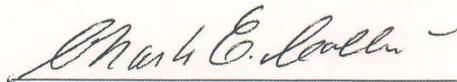
6. Plaintiff has insufficient insufficient knowledge to admit or deny the other pargraphs of the defendants' Verified Answer except paragraph 3 which they admitted was true.

7. The defendant's counterclaim constutes a frivilous action and pursuant to the provisions of the NYS Rules of Court, subpart 130-1, Plaintiff is entitled to samctions against the defendants, together with reasopnable attorney fees and costs

incurred in this action.

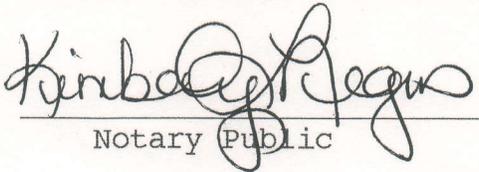
WHEREFORE, Plaintiff demands judgment against the Defendants:

1. Dismissing the Defendant's counterclaim;
2. Granting the Plaintiff's verified complaint 2 against the defendants.
3. Such other and further relief as this Court may deem just and proper.



Charles E. Collins, III
Plaintiff
108 Brunswick Road
Troy, New York 12180
(518) 274-0380

Sworn to before me this
8th day of September, 2010



Notary Public

Kimberly L. Negus
Notary Public, State of New York
Qualified in Saratoga County
No. 01NE6200863
Commission Expires February 9, 2013