

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
NATHAN J. BERRY AND KAYLA MARIE VELASQUEZ,

Plaintiffs,

-against-

PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC,
AVIS BUDGET GROUP INC, ZIPCAR INC, ZIPCAR NEW
YORK INC, MICHAEL O. KARIKARI, IDALIA JIMENEZ
AND ANDRES J. MARTINEZ,

Defendants,
-----X

Index No.:

Date Purchased:

SUMMONS

Plaintiff designates Bronx
County as the place of trial.

The basis of venue is:
Plaintiffs' residence

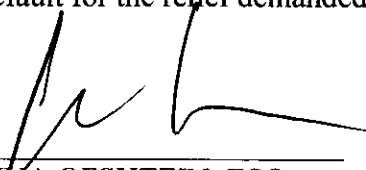
Plaintiff resides at:
1440 Wood Road, Apt.MD
Bronx, NY 10462

County of Bronx

To the above named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
August 3, 2026


AKIVA OFSHTEIN, ESQ
OFSHTEIN LAW FIRM, P. C.
Attorneys for Plaintiff
NATHAN J. BERRY
AND KAYLA MARIE VELASQUEZ
398 Kings Highway
Brooklyn, New York 11223
(718) 455-5252
File # 25MVX7701

TO:
DEFENDANTS' ADDRESS:

PV HOLDING CORP
Via Secretary of State
80 STATE STREET
ALBANY, NY, UNITED STATES, 12207

AVIS RENT A CAR SYSTEM LLC
Via Secretary of State
80 STATE STREET
ALBANY, NY, UNITED STATES, 12207

AVIS BUDGET GROUP INC
Via Secretary of State
80 STATE STREET
ALBANY, NY, UNITED STATES, 12207

ZIPCAR INC
Via Secretary of State
80 STATE STREET
ALBANY, NY, UNITED STATES, 12207

ZIPCAR NEW YORK INC
Via Secretary of State
80 STATE STREET
ALBANY, NY, UNITED STATES, 12207

MICHAEL O. KARIKARI
136 PINALE TERRACE
SILVER SPRING, MD 20901

ANDRES J. MARTINEZ
3400 FT INDEPENDENCE STREET APT 13C
BRONX, NY 10463

IDALIA JIMENEZ
1575 EAST 174TH STREET APT 5H
BRONX, NY 10472

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.:

Date Purchased:

-----X
NATHAN J. BERRY AND KAYLA MARIE
VELASQUEZ,

VERIFIED COMPLAINT

Plaintiffs,

-against-

PV HOLDING CORP, AVIS RENT A CAR SYSTEM
LLC, AVIS BUDGET GROUP INC, ZIPCAR INC,
ZIPCAR NEW YORK INC, MICHAEL O. KARIKARI,
IDALIA JIMENEZ AND ANDRES J. MARTINEZ,

Defendants,

-----X

Plaintiffs, **NATHAN J. BERRY AND KAYLA MARIE VELASQUEZ**, by their attorneys,
OFSHTEIN LAW FIRM, P. C., complaining of the Defendants, **PV HOLDING CORP, AVIS RENT
A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC, ZIPCAR NEW YORK INC,
MICHAEL O. KARIKARI, IDALIA JIMENEZ AND ANDRES J. MARTINEZ**, respectfully alleges,
upon information and belief:

1. At all times herein mentioned, Plaintiff, **NATHAN J. BERRY**, was and still is a resident of the County of Bronx and State of New York.
2. At all times herein mentioned, Plaintiff, **KAYLA MARIE VELASQUEZ**, was and still is a resident of the County of Bronx and State of New York.
3. At all times herein mentioned, Defendant, **AVIS RENT A CAR SYSTEM LLC**, was and still is a domestic business corporation authorized to conduct business in the State of New York.
4. At all times herein mentioned, Defendant, **PV HOLDING CORP**, was and still is a domestic business corporation authorized to conduct business in the State of New York.

5. At all times herein mentioned, Defendant, **AVIS BUDGET GROUP INC**, was and still is a domestic business corporation authorized to conduct business in the State of New York.

6. At all times herein mentioned, Defendant, **ZIPCAR INC**, was and still is a domestic business corporation authorized to conduct business in the State of New York.

7. At all times herein mentioned, Defendant, **ZIPCAR NEW YORK INC**, was and still is a domestic business corporation authorized to conduct business in the State of New York.

8. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was and still is a resident of County of Montgomery and State of Maryland.

9. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, was and still is a resident of County of Bronx and State of New York.

10. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was and still is a resident of County of Bronx and State of New York.

AS AND FOR A FIRST CAUSE OF ACTION ON BEHALF OF PLAINTIFF KRYSTAL NATHAN J. BERRY AGAINST DEFENDANTS' PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC, ZIPCAR NEW YORK INC, MICHAEL O. KARIKARI

11. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the registered owner of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

12. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the lessor of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

13. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the lessee of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

14. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was the operator of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

15. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

16. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the knowledge of defendant owner.

17. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the permission of defendant owner.

18. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the express consent of defendant owner.

19. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the implied consent of defendant owner.

20. That on or about **April 09, 2025**, Defendant, **MICHAEL O. KARIKARI**, was operating and controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, on Shore Road, in the County of Bronx, City and State of New York.

21. At the aforesaid date and place, Plaintiff, **NATHAN J. BERRY**, was a lawful passenger in 2021 Honda, motor vehicle bearing State of New York license plate number LET7447, when defendant's motor vehicle forcibly without warning struck the vehicle of the plaintiff causing a collision.

22. That as a result of the aforesaid contact, Plaintiff, **NATHAN J. BERRY**, was injured.

23. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

24. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and their prevailing.

25. That by reason of the foregoing, Plaintiff, **NATHAN J. BERRY**, sustained severe and permanent personal injuries; and Plaintiff, **NATHAN J. BERRY**, was otherwise damaged.

26. That Plaintiff, **NATHAN J. BERRY**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

27. That Plaintiff, **NATHAN J. BERRY**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

28. That Plaintiff, **NATHAN J. BERRY**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. The Plaintiff is seeking only to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

29. That this action falls within one or more of the exceptions set forth in CPLR §1602.

30. That by reason of the foregoing, Plaintiff, **NATHAN J. BERRY**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION ON BEHALF OF PLAINTIFF
KAYLA MARIE VELASQUEZ AGAINST DEFENDANTS' PV HOLDING CORP,
AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC,
ZIPCAR NEW YORK INC, MICHAEL O. KARIKARI**

31. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the registered owner of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

32. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the lessor of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

33. At all times herein mentioned, Defendant, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC AND ZIPCAR NEW YORK INC**, were the lessee of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

34. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was the operator of a 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

35. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ.

36. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the knowledge of defendant owner.

37. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the permission of defendant owner.

38. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the express consent of defendant owner.

39. At all times herein mentioned, Defendant, **MICHAEL O. KARIKARI**, was controlling 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, with the implied consent of defendant owner.

40. That on or about **April 09, 2025**, Defendant, **MICHAEL O. KARIKARI**, was operating and controlling the 2022 Toyota, motor vehicle bearing State of New Jersey license plate number P32PPZ, on Shore Road, in the County of Bronx, City and State of New York.

41. At the aforesaid date and place, Plaintiff, **KAYLA MARIE VELASQUEZ**, was a lawful passenger in 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, when defendant's motor vehicle forcibly without warning struck the vehicle of the plaintiff causing a collision.

42. That as a result of the aforesaid contact, Plaintiff, **KAYLA MARIE VELASQUEZ**, was injured.

43. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

44. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and their prevailing.

45. That by reason of the foregoing, Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained severe and permanent personal injuries; and Plaintiff, **KAYLA MARIE VELASQUEZ**, was otherwise damaged.

46. That Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

47. That Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

48. That Plaintiff, **KAYLA MARIE VELASQUEZ**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. The Plaintiff is seeking only to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

49. That this action falls within one or more of the exceptions set forth in CPLR §1602.

50. That by reason of the foregoing, Plaintiff, **KAYLA MARIE VELASQUEZ**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A THIRD CAUSE OF ACTION ON BEHALF OF PLAINTIFF
NATHAN J. BERRY AGAINST DEFENDANT IDALIA JIMENEZ AND
ANDRES J. MARTINEZ**

51. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the registered owner of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

52. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the lessor of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

53. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the lessee of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

54. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was the operator of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

55. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

56. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the knowledge of defendant owner.

57. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the permission of defendant owner.

58. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the express consent of defendant owner.

59. At all times herein mentioned, Defendant, **MICHA ANDRES J. MARTINEZEL O. KARIKARI**, was controlling 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the implied consent of defendant owner.

60. That on or about **April 09, 2025**, Defendant, **ANDRES J. MARTINEZ**, was operating and controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, traveling on Shore Road, in the County of Bronx, City and State of New York.

61. At the aforesaid date and place, Plaintiff, **NATHAN J. BERRY**, was a lawful passenger in 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, when defendant's motor vehicle, forcibly without warning struck another motor vehicle causing a collision.

62. That as a result of the aforesaid contact, Plaintiff, **NATHAN J. BERRY**, was injured.

63. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

64. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and their prevailing.

65. That by reason of the foregoing, Plaintiff, **NATHAN J. BERRY**, sustained severe and permanent personal injuries; and Plaintiff, **NATHAN J. BERRY**, was otherwise damaged.

66. That Plaintiff, **NATHAN J. BERRY**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

67. That Plaintiff, **NATHAN J. BERRY**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

68. That Plaintiff, **NATHAN J. BERRY**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. The Plaintiff is seeking only to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

69. That this action falls within one or more of the exceptions set forth in CPLR §1602.

70. That by reason of the foregoing, Plaintiff, **NATHAN J. BERRY**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A FOURTH CAUSE OF ACTION ON BEHALF OF PLAINTIFF
KAYLA MARIE VELASQUEZ AGAINST DEFENDANT IDALIA JIMENEZ AND
ANDRES J. MARTINEZ**

71. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the registered owner of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

72. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the lessor of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

73. At all times herein mentioned, Defendant, **IDALIA JIMENEZ**, were the lessee of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

74. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was the operator of a 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

75. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447.

76. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the knowledge of defendant owner.

77. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the permission of defendant owner.

78. At all times herein mentioned, Defendant, **ANDRES J. MARTINEZ**, was controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the express consent of defendant owner.

79. At all times herein mentioned, Defendant, **MICHA ANDRES J. MARTINEZEL O. KARIKARI**, was controlling 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, with the implied consent of defendant owner.

80. That on or about **April 09, 2025**, Defendant, **ANDRES J. MARTINEZ**, was operating and controlling the 2024 Honda, motor vehicle bearing State of New York license plate number LET7447,

traveling on Shore Road, in the County of Bronx, City and State of New York.

81. At the aforesaid date and place, Plaintiff, **KAYLA MARIE VELASQUEZ**, was a lawful passenger in 2024 Honda, motor vehicle bearing State of New York license plate number LET7447, when defendant's motor vehicle, forcibly without warning struck another motor vehicle causing a collision.

82. That as a result of the aforesaid contact, Plaintiff, **KAYLA MARIE VELASQUEZ**, was injured.

83. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

84. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless and reckless under the circumstances then and their prevailing.

85. That by reason of the foregoing, Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained severe and permanent personal injuries; and Plaintiff, **KAYLA MARIE VELASQUEZ**, was otherwise damaged.

86. That Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

87. That Plaintiff, **KAYLA MARIE VELASQUEZ**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

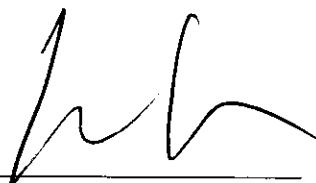
88. That Plaintiff, **KAYLA MARIE VELASQUEZ**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. The Plaintiff is seeking only to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

89. That this action falls within one or more of the exceptions set forth in CPLR §1602.

90. That by reason of the foregoing, Plaintiff, **KAYLA MARIE VELASQUEZ**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiffs, **NATHAN J. BERRY AND KAYLA MARIE VELASQUEZ**, demand judgment against the Defendants, **PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC, ZIPCAR NEW YORK INC, MICHAEL O. KARIKARI, IDALIA JIMENEZ AND ANDRES J. MARTINEZ**, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York
August 3, 2026



AKIVA OFSHTEIN, ESQ
OFSHTEIN LAW FIRM, P. C.
Attorneys for Plaintiff
NATHAN J. BERRY
AND KAYLA MARIE VELASQUEZ
398 Kings Highway
Brooklyn, New York 11223
(718) 455-5252
File # 25MVX7701

ATTORNEY VERIFICATION

The undersigned, an attorney admitted to practice in the Courts of New York State, states that I am the attorney of record for the Plaintiff, NATHAN J. BERRY AND KAYLA MARIE VELASQUEZ, in the within action; I have read the foregoing, VERIFIED SUMMONS AND COMPLAINT, and know the contents thereof; the same is true to my own knowledge, except as to the matters stated to be alleged on information and belief, and as to those matters I believe same to be true. This verification is made by affirmant because the above-named plaintiff is not within and/or does not maintain a principle place of business in the County of Kings, wherein this office is located. The grounds of belief as to all matters not stated upon personal knowledge are information contained in the office file, investigation and/or conversations with the above-named plaintiff.

I affirm the foregoing statement is true, under the penalty of perjury.

Dated: Brooklyn, New York
August 3, 2026



AKIVA OFSHTEIN, ESQ.

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF BRONX

Index No.:

NATHAN J. BERRY AND KAYLA MARIE VELASQUEZ,

PLAINTIFF,

-AGAINST-

PV HOLDING CORP, AVIS RENT A CAR SYSTEM LLC, AVIS BUDGET GROUP INC, ZIPCAR INC, ZIPCAR NEW YORK INC, MICHAEL O. KARIKARI, IDALIA JIMENEZ AND ANDRES J. MARTINEZ,

DEFENDANTS,

SUMMONS AND VERIFIED COMPLAINT

OFSHTEIN LAW FIRM PC
Attorneys for Defendant
398 Kings Highway
Brooklyn, NY 11223
718.455-5252

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney duly admitted to practice law before the Court of State of New York, certifies that, upon information and belief and reasonable inquiry, the contention contained in an annexed hereto document are not frivolous.

Dated:

Signature _____

Name: _____

Service of a copy of the within is hereby admitted.

Dated:

Attorneys for Plaintiff

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a
entered in the office of the clerk of the within named Court on ,20

☐ NOTICE OF SETTLEMENT

that an Order of which the within is a true copy will be presented for settlement to the Hon. one of
the judges of the within named Court, at on 201__ at M.