

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

P.D. & ASSOCIATES and P.D.,

Plaintiffs,

Motion Sequence No.1
Index No., 53694/2019

-against -

HALANA RICHARDSON,

Defendant.

ANSWER TO
DECISION AND ORDER

The Defendant Halana Richardson agree with most of the statements and the opinion of law stated by Judge Rudermans Decision and Order, (Motion Sequence No1.), dated July 1, 2019.

The Defendant Halana Richardson object to the Plaintiff, Peter Anthony DeFilippis (P.D.) motion for a preliminary injunction and other relief.

I am sorry for the delay in my answer. I was elated over the Decision and Order and felt some relief of validation. I felt emotional relief and peace. The Defendant Halana Richardson had a death in her family and had to go out of town.

The Defendant, Halana Richardson, as ordered by the court appeared for a Preliminary Conference on August 12, 2019, in Room 811 at 9:30am. In court I stood alongside Plaintiff, Peter Anthony DeFilippis. It was exactly what I expected. The Plaintiff Peter Anthony DeFilippis had nothing to say to me in person. The Plaintiff Peter Anthony DeFilippis did not look in my eyes nor at me. From the onset none of the clerks could find the case; the case was in the initials (P.D.). The Plaintiff Peter DeFilippis kept stating his full name Peter DeFilippis, (not ever giving his initials). I pondered and kept my comments to myself while the Plaintiff Peter Anthony DeFilippis made a point not realizing it. The Plaintiff, Peter Anthony DeFillippis, proceeded to inform everyone that this was a "Defamation Suit", He, explained the YELP review; but not its content, the judge's statement as to why I did not receive a full reward while he was my attorney years ago, and stated now ten years later she started the YELP review. I was awarded \$20,000. In which the clerk said to the Plaintiff Peter Anthony DeFilippis, I am not here to hear your complaint, have you both spoken, than Plaintiff states YELP suggested we do, but she won't talk to me. I had to listen to the Plaintiff Peter

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DeFilippis, whining. The clerk looked at me from the rim of her glasses, she interjected and stated a date of September 13th, 2019, to come back to court.

On August 12, 2019, at 9:45am, I witnessed a stiffnecked, entitled, elitist attitude, stubborn, self righteous, individual with a demeanor and character of a spoiled child who do not comprehend right or wrong, No morals or integrity, as the Plaintiff Peter Anthony DeFilippis kept explaining his side, never dealing with how it all came to existence, but wanting his way, needing to be heard as I the Defendant Halana Richardson sat and listened to the Plaintiff, Peter Anthony DeFilippis, rants of ME, ME, ME. The Plaintiff Peter Anthony DeFilippis actions and behavior were sad to watch, but expected.

When the Defendant Halana Richardson hired the Plaintiff, Peter Anthony DeFilippis, he misrepresented the Defendant Halana Richardson. Yet, on YELP he has been so arrogant and eager to display his plaques of being the best and number one, yet again I must say with all suspicion, the Defendant Halana Richardson lost her lawsuit due to the Plaintiff Peter Anthony DeFilippis non disclosure of valuable information to the court, judge and jury.

The Defendant Halana Richardson stands by her comments and statements of fraud, Apprician Ferdandez not being the driver that rear ended her In September 2002. That Nicholas Berggruen was the driver of the Mercedes that rear ended her. The Plaintiff Peter Anthony DeFilippis told me I owed him \$35,000, and wrote the amount down on paper he held in his hand. The Plaintiff Peter Anthony DeFilippis lied about the letter I wrote to the judge and last but not least the JUDGE won my case. I will always believe that when you do not disclose information that is important to a case yet both attorneys knew and the client is not privy to the information to make sound decisions on her own case, the word bribe is the definition besides being deceitful.

The Plaintiff Peter Anthony DeFilippis, is wrong and was wrong. After a decade, he is still wrong and wants the Defendant Halana Richardson to engage in a continuance battle of words and explanation of wrong. the Defendant Halana Richardson stand by accounts of events, facts and knowledge. The Defendant Halana Richardson have gained support from the community. Life is too short. I do not allow my own children to ever explain their wrong doings to me and can not sit in good faith and hear it from the Plaintiff Peter Anthony DeFilippis whom I believe and know to be wrong then and now. The Plaintiff is adamant about a lie and his events of what came about, but never explains the WHY?

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The Plaintiff, Peter Anthony DeFilippis, has no remorse for the damage he has caused to the defendant and her family. The Defendant Halana Richardson would rather not have a conversation with Plaintiff Peter Anthony DeFilippis to discuss why I wrote the review the Plaintiff, Peter Anthony DeFilippis know why, I wrote the review. The Plaintiff Peter Anthony DeFilippis has not said let's proceed forward with a resolution. The Plaintiff Peter Anthony DeFilippis messaged the Defendant Halana Richardson through YELP with the same arguments and lies. The Defendant Halana Richardson did not respond nor engage the plaintiff's argument. If the Plaintiff Peter Anthony DeFilippis do not want to move forward, the Defendant Halana Richardson will not entertain his ego nor his wrongful actions of behavior.

Had the Plaintiff Peter Anthony DeFilippis, apologized and took accountability for his deliberate intent by sabotage my case, we would not be here. Had the Plaintiff Peter Anthony DeFilippis not misrepresented the defendant we would not be in court to date. The Plaintiff and his attorney Daniel Szalkiewicz & Associates have fabricated and stretched stories to fabricate events regarding me harassing others and writing other stories of wrongdoing. Plaintiff Peter Anthony DeFilippis has a great deal of pride.

The Defendant Halana Richardson came to his office a decade ago with one name Nicholas Berggruen whom I stated rear ended the defendant while he was in his car on the cell phone and fled the scene of the accident Six years later another man Apparician Fernandez was added to the case, without my knowledge and took the stand.

New York State Law, who ever rear ends anyone is at fault, leaving the scene of an accident Nicholas Berggruen was at fault and using his cell phone while driving Nicholas Burggruen is still at fault. Nicholas Berggruen did not get punished, yet the Plaintiff Peter Anthony DeFillippis continued to state he did nothing wrong, yet confessed he did not disclose the information to my case, and wanted the case sealed. The Defendant Halana Richardson right to FREEDOM OF SPEECH, should stand it is the defendant's RIGHT, and the law well before this case came into existence.

Daniel Szalkiewicz & Associates, the attorney for the Plaintiffs Peter Anthony DeFilippis & P.D. Associates and P.D., letter dated May 21, 2019, Re: P.D. & Associates et al v.Halana Richardson Supreme Court, Westchester County, Index No. 53694/2019. Continue their smear campaign to discredit me.

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Daniel Szalkiewicz & Associates, complains of the Defendants, Halana Richardson continues online harassment against the Plaintiff, Peter Anthony DeFilippis & Associates (P.D. & Associates). The Defendant Halana Richardson has not continued any further harassment of the Plaintiff Peter DeFillippis. Both law firms refuse to acknowledge the truth and continue to support one another. Daniel Szalkiewicz & Associates as the firm and attorney that the Plaintiff, Peter Anthony DeFilippis (P.D.), I presented the Decision and Order to YELP in my defense, the community was updated, as well as other websites, thanks to Judge Rudermans Decision and Order dated July 1, 2019. The Plaintiff Peter Anthony DeFilippis did confess, acknowledged that he deceived the Defendant, Halana Richardson by not disclosing information to the Defendant, Halana Richardson when the Plaintiff Peter Anthony DeFilippis was her attorney.

The Plaintiff Peter Anthony DeFilippis (P.D.) was working with the other side, attempted to sue me for payment, sabotaged my case, lied, deceived the Defendant Halana Richardson when the defendant was his client. The Defendant knew it was Nicolas Berggruen, who rear ended her and was the driver of the other vehicle. After six years, then another man was added to the lawsuit as the driver. I judged the Plaintiff Peter Anthony DeFilippis, by his character and work experience. I had a right to give the review and my opinion, allegations and events true.

Pursuant to Judge Rudermans Decision and Order dated July 1, 2019, continue to witness to the Plaintiff knowingly deceived me, and the Plaintiffs attitude to hold onto a lie and intentionally took advantage of the defendant and did not care about the contract he signed and his OATH as an attorney.

Websites are here for consumer protection, to inform others of the intent of businesses. I trusted then attorney Peter Anthony DeFilippis. The whole entire time the Plaintiff Peter Anthony DeFilippis (P.D.) deceived me. The Plaintiff asked me to write a review, being presumptuous about my feelings he did not care, he vexed me.

Daniel Szalkiewicz and & Associates continue to state that the Plaintiff Peter Anthony DeFilippis had no opportunity to rebut its content, yet I have constantly stated the same acts and events. The Plaintiff Peter Anthony DeFilippis (P.D.) responded to the reviews. The Defendant Halana Richardson allegations are true and has merit. The Plaintiff Peter Anthony DeFilippis (P.D.) is seared in his conscious the evidence against the Plaintiff is overwhelming. I appreciate the law and your judgement to let all the information be seen and of knowledge.

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Daniel Szalkiewicz & Associates wants this to go to trial, I would appreciate another trial and then the Defendant would like to recover an award and relief of a \$1,000,000, for the lack of respect to the law, harassment, dishonesty, emotional stress, physical stress on my body, my freedom of speech and my truth.

Daniel Szalkiewicz & Associates have not proved that I have lied, misled, nor continue to harass the Plaintiff Peter Anthony DeFilippis. Both attorneys and Law firms have embellished and exaggerated their complaint against me.

If the Plaintiff Peter Anthony DeFilippis continue with this suit I would like to pursue an award and relief for damages in the amount of \$1,000,000 for waste of time and money.

However it is sad to know the Plaintiff Peter Anthony DeFilippis has a family, daughters that will know how this world takes advantage of women and their families and this Plaintiff Peter Anthony DeFilippis is a part of that world and profited. The Plaintiff has caused emotional/physical stress and poverty.

I thank the court for its truth and time to account to both sides of the law. The Plaintiff Peter Anthony DeFilippis continual actions/behavior have kept me in the past; due to the Plaintiff's past actions and future behavior. Maybe a trial would bring everything out in the wash. Than the Defendant can obtain a relief from both law firms in the amount of a \$1,000,000. The Defendant, is more than willing to take a lie detector test to prove her innocence. I will than consultant and obtain a veteran attorney.

I thank the court for its attention to this matter and request a much needed relief if the Plaintiff Peter Anthony DeFilippis continues this case against me for my truth.

In Truth Yours,

Halana D. Richardson

By: Halana D. Richardson

Cc: Daniel S. Szalkiewicz, Esq. P.D. & Associates, Plaintiff Peter Anthony DeFilippis, YELP, PISSEDOFFCONSUMER