

EXHIBIT F

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

JOSE AYBAR, ORLANDO GONZALES, JOSE AYBAR as Administrator of THE ESTATE OF CRYSTAL CRUZ-AYBAR, JESENIA AYBAR as Administratrix of THE ESTATE OF NOELIA OLIVERAS, JESENIA AYBAR as LEGAL GUARDIAN on behalf of K.C., a minor, ANNA AYBAR and JESENIA AYBAR as Administratrix of THE ESTATE OF TIFFANY CABRAL

VERIFIED ANSWER TO THIRD-PARTY COMPLAINT

Index No. 9344/2014

Plaintiffs,

- against -

US TIRES AND WHEELS OF QUEENS, LLC,

Defendant.

US TIRES AND WHEELS OF QUEENS, LLC,

Third-Party Plaintiff,

-against-

THE GOODYEAR TIRE & RUBBER COMPANY,
GOODYEAR DUNLOP TIRES NORTH AMERICA, LTD. and FORD MOTOR COMPANY,

Third-Party Defendants.

FORD MOTOR COMPANY, by its attorneys, AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP, as and for its Answer to plaintiffs' Complaint, respectfully shows to this Court and alleges upon information and belief:

1. Denies knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph(s) "1" and "2" and refers all questions of law to the Court.

2. Denies the allegations contained in paragraph(s) "3" in the form alleged except admits that an action under Index No.: 706909/15 was filed.

AS AND FOR THE FIRST CAUSE OF ACTION

3. In response to paragraph "4", repeats each admission or denial contained in paragraphs "1" through "3" herein as though fully set forth hereat.

4. Denies the allegations contained in paragraph(s) "5" as to FORD MOTOR COMPANY and denies knowledge or information sufficient to form a belief as to the truth of the allegations as to the other defendants and refers all questions of law to the Court.

AS AND FOR THE FIRST AFFIRMATIVE DEFENSE

5. That the Court lacks personal jurisdiction over the answering defendant.

AS AND FOR THE SECOND AFFIRMATIVE DEFENSE

6. The liability of the answering defendant(s), if any, is limited pursuant to CPLR Article 16.

AS AND FOR THE THIRD AFFIRMATIVE DEFENSE

7. The cause(s) of action set forth in plaintiffs' complaint are barred inasmuch as the action was not instituted within the time period prescribed by all applicable Statute of Limitations.

AS AND FOR THE FOURTH AFFIRMATIVE DEFENSE

8. That the injuries claimed by plaintiffs in the complaint were cause in whole or in part, by the culpable conduct of the plaintiffs which either bars the claims completely or else diminishes the damages by the proportion that such culpable conduct of the plaintiffs bear to the total culpable conduct causing the injuries.

AS AND FOR THE FIFTH AFFIRMATIVE DEFENSE

9. Plaintiffs' cause of actions are barred by UCC §2.313.

AS AND FOR THE SIXTH AFFIRMATIVE DEFENSE

10. Plaintiffs' cause of actions are barred by UCC §2.314.

AS AND FOR THE SEVENTH AFFIRMATIVE DEFENSE

11. Plaintiffs' cause of actions are barred by UCC §2.315.

AS AND FOR THE EIGHTH AFFIRMATIVE DEFENSE

12. The complaint should be dismissed for failing to name all indispensable parties.

AS AND FOR THE NINTH AFFIRMATIVE DEFENSE

13. The complaint should be dismissed and/or plaintiffs' potential recovery reduced proportionally because the accident and/or plaintiffs' injuries/death were caused by the acts of others who are not named as defendants in this case.

AS AND FOR THE TENTH AFFIRMATIVE DEFENSE

14. The defendant, FORD MOTOR COMPANY is entitled to an offset pursuant to GOL§15-108.

AS AND FOR THE ELEVENTH AFFIRMATIVE DEFENSE

15. The complaint should be dismissed because plaintiffs did not avail themselves of all of the safety restraints available in the vehicle including, but not limited to, the proper use of their safety belt.

**AS AND FOR A COUNTERCLAIM AGAINST THIRD-PARTY PLAINTIFF US TIRES
AND WHEELS OF QUEENS, LLC**

16. That if the third-party plaintiff was caused to sustain damages at the time and place set forth in plaintiffs' Complaint through any carelessness, recklessness, and negligence other than plaintiffs' own, said damages arose in whole or in part from the negligence of third-party

plaintiff, US TIRES AND WHEELS OF QUEENS, LLC, and if any judgment is recovered herein by the third-party plaintiff against the answering third-party defendant(s), the third-party defendant(s) will be damaged thereby and the answering third-party defendant(s) will be entitled to contribution on the basis of proportionate responsibility in negligence from the third-party plaintiff named above.

WHEREFORE, the answering third-party defendant demands judgment dismissing the Complaint with costs and further demands that the ultimate rights of the answering third-party defendant and the third-party plaintiff name above as between themselves be determined in this action, and that the answering third-party defendant have judgment over and against the third-party plaintiff named above for all or a part of any verdict or judgment which may be obtained against the answering third-party defendant, together with the costs and disbursements of this action.

WHEREFORE, Third-Party Defendant FORD MOTOR COMPANY, demands judgment dismissing the Complaint, together with the costs and disbursements of the within action.

Dated: New York, New York
September 27, 2016

Yours, etc.

BY: Peter J. Fazio
AARONSON RAPPAPORT FEINSTEIN
& DEUTSCH, LLP
Attorneys for Third-Party Defendant
Office & P.O. Address
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New York, New York 10016
Tel.: (212) 593-6700

ATTORNEY'S VERIFICATION

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

PETER J. FAZIO, being duly sworn, deposes and says:

That I am a member in the firm of attorneys representing the defendant **FORD MOTOR COMPANY.**

That I have read the attached **VERIFIED ANSWER** and the same is true to my own belief, except as to matters alleged on information and belief, and as to those matters, I believe them to be true to the best of my knowledge.

My sources of information are a claims file containing statements, reports and records of investigation, investigators, parties and witnesses, with which I am fully familiar.

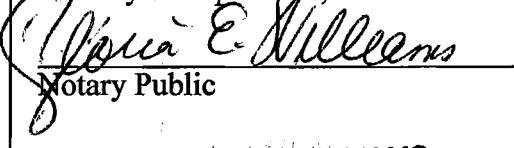
That this verification is made by me because my client does not reside within the county where I maintain my office.



PETER J. FAZIO

Sworn to before me this

27th day of September, 2016.



Notary Public

GLORIA E. WILLIAMS
Notary Public, State of New York
No. 01WI5031377
Qualified in Queens County
Commission Expires Aug. 1, 2018

AFFIDAVIT OF SERVICE BY MAIL

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

JAIME OROVIC, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides at Westchester County, New York.

That on the 29th day of September, 2016, deponent served the within VERIFIED ANSWER TO THIRD-PARTY COMPLAINT upon:

MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN
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DLA PIPER LLP (US)
Attorneys for Defendant/Third Party Defendant
THE GOODYEAR TIRE & RUBBER COMPANY
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MONTFORT HEALY McGUIRE & SALLEY
Attorneys for Plaintiff
JOSE A. AYBAR, JR.
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at the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.

JAYME OROVIC

Sworn to before me this

29th day of September, 2016.


Notary Public

ALINA ONEFATER
Notary Public, State of New York
No. 02ON6338985
Qualified in Queens County
Commission Expires March 21, 2020