
Rama and Manjula, LLC
(A Corporation)

Petitioner

against

Christine Fye and John Doe
26 Bushwick Avenue Apt. 2Frt
Brooklyn, NY 11211

Respondents

Motion to Permit Submission of Additional Counterclaims

1. Now comes John Doe, Respondent, proceeding *pro se* on behalf of Respondents, and respectfully prays this Honorable Housing Court grant this Motion to Permit Submission of Additional Counterclaims in response to economic harm suffered by Respondents as a result of Petitioner's unlawful use of this Honorable Housing Court in this case.
2. Respondents respectfully submit - as described in their Motion to Vacate Stipulation of Settlement as Fatally Defective - that this Honorable Housing Court has no legal jurisdiction to uphold Petitioner's claims, as Petitioner has failed to register the premises as a Multiple Dwelling Unit, as required by law.
3. Petitioner can not claim ignorance of the fact that Petitioner has no legal right to remedies from this Honorable Housing Court of as Petitioner has received by Certified Mail a copy of Respondents' Motion to Vacate Stipulation of Settlement as Fatally Defective, in which Petitioner clearly drew attention to the absence of jurisdiction of this Honorable Housing Court as well as to other illegal actions by Petitioner.
4. Respondents respectfully submit that any harm and damages Respondents have suffered, and may suffer in the future, as a result of Petitioner's persistent unlawful and willful use of this Honorable Housing Court to seek repossession of Respondents' home can rightfully be included in Respondents' Counterclaims in this Honorable Housing Court.
5. In the interests of a timely filing of this Motion, Respondents respectfully request a reasonable period of time - e.g. by the time of a scheduled trial date for Residents' Counterclaims - within which to compile and present detailed evidence of the harm Respondents have suffered in consequence of Petitioner's unlawful use of the protection of this Honorable Housing Court.

Respectfully submitted this 22nd day of June in the year 2000.

John Doe