

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Return Date: February 7, 2020

-----X  
BETTY SEBROW, Individually and as a Shareholder of  
WORBES CORPORATION,

Index No.  
33784/2019E

Plaintiff,

*Assigned to*  
**Hon. Llinet M. Rosado, J.S.C.**

-against-

ZVI SEBROW, NYCTL 2017-A TRUST and  
THE BANK OF NEW YORK MELLON as  
Collateral Agent and Custodian,

**AFFIDAVIT IN  
OPPOSITION**

Defendants.

-----X  
STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NASSAU     )

BETTY SEBROW, being duly sworn, deposes and says:

1. I am the Plaintiff in this action. I am also the widow of David Sebrow, to whom I was married for nearly three decades, when he passed away on May 29, 2017.
2. I have reviewed the affirmation of my attorney Jonathan A. Stein, and fully concur with and adopt all of the factual statements and legal arguments he has made.
3. In his Last Will and Testament, my husband David named me as the Executor and left his entire Residuary Estate to me. (Copies of my husband David’s Last Will and Testament and the Letters Testamentary issued to me by the Nassau County Surrogate’s Court are respectively annexed hereto as Exhibits “A” and “B”).
4. Having been married to my husband for so long I was and am quite familiar with his signature. I have carefully examined the signature on the purported shareholder agreement. I am certain it is a forgery. This is further augmented by the fact that Defendant Zvi Sebrow has

previously admitted to me that he routinely forged my deceased husband's signature when he needed it on documents and checks in connection with the running of Worbes and two related businesses, S & S Soap Co., Inc. and Worbes Leasing Corp.<sup>1</sup>

5. Based upon the foregoing, and the arguments raised by my attorney, I respectfully request that Defendant Zvi Sebrow's motion be denied in its entirety.

**WHEREFORE**, this Court should issue and enter an order denying the motion to dismiss in its entirety, and granting such other and further relief as to this Court may seem just, proper and equitable.

  
\_\_\_\_\_  
**BETTY SEBROW**

Sworn to before me this

28 day of January, 2020

  
\_\_\_\_\_  
Notary Public

JONATHAN A. STEIN  
NOTARY PUBLIC, State of New York  
No. 02ST4755192  
Qualified in Nassau County  
Commission Expires February 28, 2022

---

<sup>1</sup> Both S & S Soap Co., Inc. and Worbes Leasing Corp. were dissolved by proclamation, by the New York Secretary of State on January 25, 2012.