

STATE OF NEW YORK
SUPREME COURT COUNTY OF JEFFERSON

JOHN L. YEHLE,

RESPONSE TO
THE VERIFIED PETITION
Petitioner, Index No.: 2015-1321
RJ No.: 22-15-0572

v

JON T. RICH, JR.,

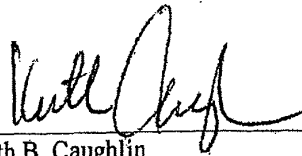
Respondent.

JON T. RICH, JR., alleges the following:

1. **ADMITS**, the allegations of paragraphs numbered: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 14, 16, 17, and 19 of the Petition, and joins in the requested relief of the Wherefore clause seeking dissolution, direction to sell the assets in a commercially reasonable manner, directing an accounting of the contributions each members made and an accounting "be made of each member in connection with monies spent on behalf of the company with company funds" and directing distribution of the assets after payment of debts.
2. **DENIES**, the allegations of paragraphs numbered: 11(a), 11(b), 11(c), 11(d), 11(e), 11(f), 11(g), 12, 15, 18, 21, 22, 23, 24, and 25.
3. **ADMITS** that portion of paragraph 13 that is not reasonably practicable to carry on the business of the company in conformity with the Articles of Organization and/or the Operating Agreement, and **DENIES** the balance of the allegations in paragraph 13.
4. **ADMITS** that portion of paragraph 15 that negotiations have failed and the parties cannot continue the business of the corporation, but **DENIES** that the Petitioner used his best efforts.
5. In response to the allegations of paragraph 20, the Respondent repeats and realleges the corresponding responses to paragraphs 1 – 19.

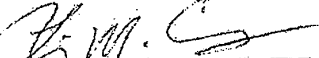
WHEREFORE, the Respondent seeks a dissolution of Wellesley Island Storage, LLC and an order directing the sale of the assets, an account of each member to the other and a distribution of the remaining assets.

Dated: August 31, 2015



Keith B. Caughlin
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Sworn to before me this 31st day
of August, 2015


Notary Public

LISA M. COTRACCIA
Notary Public, State of New York
Qualified in Jefferson County No. 6286484
Commission Expires July 22, 2021

TO: Robert J. Slye, Esq.
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