

IN THE CIRCUIT COURT FOR HOWARD COUNTY, MARYLAND

TIFFANY

Plaintiff,

v.

ZACHARY

Defendant.

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Case No. MT
Judge Raymond Kane, Jr.

ANSWER

COMES NOW the Defendant, Zachary by and through his attorneys, Kathryn C. Buettner and DeCaro, Doran, Siciliano, Gallagher & DeBlasis, LLP, and for Answer to the Complaint filed herein, states as follows:

FIRST DEFENSE

The Complaint fails to state a claim upon which relief may be granted.

SECOND DEFENSE

The cause of action asserted by the Plaintiff did not accrue within the applicable statute of limitations.

THIRD DEFENSE

The Defendant affirmatively asserts that the injuries allegedly sustained by the Plaintiff were caused by the sole, concurring, and/or contributory negligence of the Plaintiff.

FOURTH DEFENSE

The Defendant affirmatively asserts that the Plaintiff assumed the risk of her injuries.

DeCARO, DORAN,
SICILIANO, GALLAGHER,
& DeBLASIS, LLP

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FIFTH DEFENSE

The Complaint fails to join a party in whose absence complete relief cannot be accorded among those already partied.

SIXTH DEFENSE

Assuming negligence or other wrongdoing on the part of this Defendant, which this Defendant expressly denies, it was not the proximate cause of the Plaintiff's alleged injuries, but the Plaintiff's alleged injuries were a result of superseding and/or intervening causes.

SEVENTH DEFENSE

Assuming negligence or other wrongdoing on the part of this Defendant, which this Defendant expressly denies, it was not the proximate cause of the Plaintiff's alleged injuries, but the Plaintiff's alleged injuries were a result of prior and/or subsequent conditions or occurrences for which this Defendant was not responsible.

EIGHTH DEFENSE

The Defendant affirmatively asserts that the Plaintiff's claim is barred by the doctrines of accord and satisfaction, estoppel, release, and/or res judicata.

NINTH DEFENSE

The Defendant denies any and all allegations of negligence or other wrongdoing as stated in the Complaint filed herein and will demand strict proof of all allegations in that regard.

DeCARO, DORAN,
SICILIANO, GALLAGHER,
& DeBLASIS, LLP

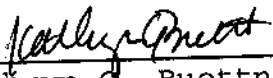
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WHEREFORE, the Complaint having been fully answered, the Defendant, Zachary respectfully prays that the Complaint be dismissed, with costs to be adjudged against the Plaintiff, or for such other relief as this Honorable Court may deem just and proper.

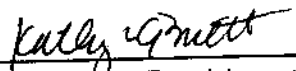
Respectfully submitted,

DeCARO, DORAN, SICILIANO,
GALLAGHER & DeBLASIS, LLP


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Counsel for Defendant

JURY REQUEST

The Defendant hereby demands trial by jury on all issues raised herein.


Kathryn C. Buettner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of August, 2005, I mailed, postage prepaid, a copy of the foregoing Answer, to:

J. Matthew Bodman, Esquire
Miller & Zois, LLC
Empire Towers, Suite 615
7310 Ritchie Highway
Glen Burnie, Maryland 21061
Counsel for Plaintiff


Kathryn C. Buettner

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