

**IN THE [COURT NAME] COURT OF [COUNTY] COUNTY, [STATE]**

[DIVISION, if applicable]

[PLAINTIFF(S) FULL LEGAL NAME(S)],

Plaintiff(s),

v.

[DEFENDANT(S) FULL LEGAL NAME(S)],

Defendant(s).

**Case No. [Case or Cause Number]**

**ANSWER TO COMPLAINT**

Defendant, [Defendant's full legal name], by and through [his/her/its] undersigned [attorney/self], hereby answers the Complaint filed by Plaintiff, [Plaintiff's full legal name], as follows:

**I. RESPONSES TO ALLEGATIONS**

1. Defendant admits the allegations contained in Paragraph 1 of the Complaint.
2. Defendant denies the allegations contained in Paragraph 2 of the Complaint.
3. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 3 of the Complaint, and therefore denies the same.
4. Defendant admits that [state specific fact admitted from paragraph 4], but denies the remaining allegations contained in Paragraph 4 of the Complaint.
5. Defendant denies the allegations contained in Paragraph 5 of the Complaint.
6. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 6 of the Complaint, and therefore denies the same.
7. Defendant denies each and every allegation in the Complaint not specifically admitted, qualified, or otherwise responded to herein.

## II. AFFIRMATIVE DEFENSES

Defendant asserts the following affirmative defenses:

1. **Failure to State a Claim:** The Complaint fails to state a claim upon which relief can be granted.
2. **Lack of Standing:** Plaintiff lacks standing to bring this action.
3. **Statute of Limitations:** Plaintiff's claims are barred by the applicable statute of limitations.
4. **Waiver:** Plaintiff's claims are barred by the doctrine of waiver.
5. **Estoppel:** Plaintiff's claims are barred by the doctrine of estoppel.
6. **Contributory/Comparative Negligence:** Plaintiff's own negligence, if any, contributed to or caused the damages alleged.
7. **Failure to Mitigate Damages:** Plaintiff failed to mitigate any alleged damages.
8. **Lack of Causation:** Any alleged damages were not proximately caused by any act or omission of Defendant.
9. **No Damages:** Plaintiff has suffered no damages as a result of any act or omission by Defendant.
10. **Reservation of Rights:** Defendant reserves the right to assert additional affirmative defenses as they become known through discovery or further investigation.

## III. PRAYER FOR RELIEF

WHEREFORE, Defendant, [Defendant's full legal name], respectfully requests that this Honorable Court:

- a. Dismiss Plaintiff's Complaint in its entirety, with prejudice;
- b. Award Defendant [his/her/its] costs and reasonable attorney's fees incurred in this action; and
- c. **Grant such other and further relief as the Court deems just and proper.**

**Dated:** [dated]

**Respectfully submitted,**

**Signature:** \_\_\_\_\_

**Printed Name:** [Defendant's full legal name or Attorney's Printed Name]

[Bar No., if applicable: [no. if applicable]]

[Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]