

IN THE _____ COURT OF _____ COUNTY,

_____,
Plaintiff,

v. Case No. _____

_____,
Defendant.

_____/

ANSWER TO COMPLAINT

Defendant, _____, by and through undersigned counsel, or appearing pro se, hereby responds to the Complaint filed by Plaintiff, _____, as follows:

I. INTRODUCTION

1. Defendant generally denies each and every allegation contained in Plaintiff's Complaint, except as expressly admitted herein, and asserts the affirmative defenses set forth below.

II. RESPONSE TO ALLEGATIONS

2. Defendant responds to each numbered paragraph of Plaintiff's Complaint as follows. For purposes of this Answer, an allegation is admitted if it is true, denied if it is false, and stated to be outside of Defendant's knowledge if Defendant lacks sufficient information to form a belief as to the truth or falsity of the allegation. Any allegation not specifically admitted is hereby denied.

(Specific responses to each numbered paragraph of Plaintiff's Complaint are omitted here as no specific allegations were provided by the user. In a filed document, Defendant would admit, deny, or state insufficient knowledge as to each corresponding paragraph of the Complaint.)

III. AFFIRMATIVE DEFENSES

3. Defendant asserts all applicable affirmative defenses, including but not limited to those that may be discovered during the course of litigation. Defendant reserves the right to amend this Answer to include additional affirmative defenses as they become known or applicable. Without waiving the right to assert other defenses, Defendant asserts the following affirmative defenses:

- a. The Complaint fails to state a claim upon which relief can be granted.
- b. Plaintiff's claims are barred, in whole or in part, by the applicable statute of limitations.
- c. Plaintiff's claims are barred by the doctrine of waiver.
- d. Plaintiff's claims are barred by the doctrine of estoppel.
- e. Plaintiff's claims are barred by the doctrine of laches.
- f. Plaintiff's claims are barred by the doctrine of unclean hands.
- g. Plaintiff has failed to mitigate damages, if any.
- h. Any damages claimed by Plaintiff were caused, in whole or in part, by Plaintiff's own negligence or fault.

IV. COUNTERCLAIMS

4. Defendant asserts no counterclaims at this time.

V. PRAYER FOR RELIEF

WHEREFORE, Defendant respectfully requests that this Honorable Court: a. Dismiss Plaintiff's Complaint in its entirety, with prejudice;
b. Award Defendant its costs and reasonable attorney's fees incurred in this action; and
c. Grant Defendant such other and further relief as the Court deems just and proper.

Dated this _____ day of _____, 20____.

Respectfully submitted,

Signature

Printed Name: _____

Bar No. (if applicable): _____

Attorney for Defendant / Defendant, Pro Se Street Address:

Unit Number (if applicable): _____

City: _____

State: _____

Zip Code: _____

Phone: _____

Email: _____

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of _____, 20____, a true and correct

copy of the foregoing ANSWER TO COMPLAINT was served upon the following party(ies) by the method indicated below:

Recipient: Address: Service Method: First-Class Mail

Hand Delivery

Email

Other (specify): _____

Signature