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In the \_\_\_\_\_ Court for the County of \_\_\_\_\_  
in the State of \_\_\_\_\_

Plaintiff,  
v.  
Defendant.

) Case No.:  
)  
) Answer  
)  
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)

COMES NOW the Defendant \_\_\_\_\_ in answering the allegations of Plaintiff's Complaint denies and alleges as follows:

1. Defendant affirms the allegations set forth in Paragraphs \_\_\_\_\_ of Plaintiff's Complaint.
2. Defendant does not dispute the facts set forth in Paragraphs \_\_\_\_\_ of Plaintiff's Complaint.
3. Defendant denies the allegations set forth in Paragraphs \_\_\_\_\_ of Plaintiff's Complaint.
4. Defendant lacks sufficient information to either affirm or deny the allegations set forth in Paragraphs \_\_\_\_\_ of Plaintiff's Complaint. To the extent that Defendant does possess sufficient information, Defendant denies those allegations.

Defendant submits the following defenses and allegations supporting Plaintiff's cause of action:

**Defense 1 -**

Defendant denies the allegations by Plaintiff in Count 1.

**Affirmative Defenses**

NOTWITHSTANDING THE DEFENSES SET FORTH ABOVE, Defendant also submits the following affirmative defenses:

1. Plaintiff's Complaint fails to state a claim for which relief can be obtained.
2. This Court lacks subject matter jurisdiction over this action.
3. This venue is improper for this action.
4. The statute of limitations to this action has expired, barring Plaintiff's ability to bring this action.

WHEREFORE, Defendant requests that this Court deny Plaintiff's claims, enter judgment in favor of Defendant, dismiss this suit with prejudice, and award Defendant its fees and costs, including attorney fees, reasonably incurred in connection to this matter.

Respectfully submitted this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

\_\_\_\_\_  
Name:  
Its:  
Defendant