

IN THE CIRCUIT COURT OF COUNTY,

PLAINTIFF

VS.

NO.

DEFENDANTS

SEPARATE ANSWER AND AFFIRMATIVE DEFENSES OF

COMES NOW , a Defendant in the above styled and numbered action and files this its answer to the Complaint as follows:

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim upon which relief can be granted.
2. Any award of damages, actual or punitive, based upon vague and undefined standards of liability would violate the due process clause of the Fourteenth Amendment of the United States Constitution, and the due process clause of the Constitution of the State of .
3. The amount of punitive damages sought is unconstitutionally excessive and disproportionate to this Defendant's alleged conduct and violates the due process clause of the Fourteenth Amendment of the United States Constitution and the due process clause of the Constitution of the State of .

ANSWER

And now the Defendant, , answers the numbered paragraphs of the Complaint as follows:

1. Defendant .
2. Defendant .
3. Defendant .
4. Defendant .
5. Defendant .
6. Defendant .
7. Defendant .
8. Defendant .
9. Defendant .

10. Defendant .
11. Defendant .
12. Defendant .
13. Defendant .
14. Defendant .
15. Defendant .
16. Defendant .
17. Defendant .

Respectfully submitted,

Attorney for

CERTIFICATE OF SERVICE

I, _____, certify that I have this day mailed, by United States mail, postage prepaid, a true and correct copy of the foregoing Separate Answer and Affirmative Defenses to the following:

DATED this _____ day of _____, 20____.