

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

ANSWER TO COUNTERCLAIM

Come now plaintiffs/counterdefendants, and , and file this, their answer to the counterclaim lodged against them in this cause.

FIRST DEFENSE

The counterclaim fails to state a claim upon which relief can be granted the counter plaintiff.

SECOND DEFENSE

This is the improper venue for this counterclaim.

THIRD DEFENSE

Process for this counterclaim is insufficient.

FOURTH DEFENSE

Service of process for this counterclaim is insufficient.

FIFTH DEFENSE

Defendant/counter plaintiff shall note that plaintiffs/Counter defendants respond to the specific numbered allegations of the counterclaim as follows.

1. Plaintiffs/counter defendants admit the allegations of paragraph 1 of the counterclaim except to deny that their counsel of record is , Esq., and that they are or were subject to service of process by service upon Mr./Ms. .

2. Plaintiffs/counter defendants admit the allegations of paragraph 2 of the counterclaim.

3. Plaintiffs/counter defendants admit that was previously an employee of defendant/counter plaintiff, d/b/a , and that 's father/mother, , was previously an employee of defendant/counter plaintiff. It is also admitted that is the spouse of . All

allegations of paragraph 3 of the counterclaim which are not specifically admitted are hereby denied.

4. Plaintiff/counter defendants deny the allegations of paragraph 4 of the counterclaim.

5. Plaintiff/counter defendants deny the allegations of paragraph 5 of the counterclaim.

6. Plaintiff/counter defendants deny the allegations of paragraph 6 of the counterclaim.

7. Plaintiff/counter defendants deny the allegations of paragraph 7 of the counterclaim.

8. Plaintiff/counter defendants deny the allegations of paragraph 8 of the counterclaim.

9. Plaintiff/counter defendants deny the allegations of paragraph 9 of the counterclaim.

10. Plaintiff/counter defendants deny the allegations of paragraph 10 of the counterclaim.

SIXTH DEFENSE

Defendant/counter plaintiff shall note that plaintiffs/ counter defendants raise the following affirmative defenses to the counterclaim presented by defendant/counter plaintiff.

11. As to the claims for defamation, commercial disparagement, misrepresentation and any other claims for which it might be a defense, plaintiff/counter defendants assert that all statements made by them were true.

12. Certain of the many claims incorporated within the counterclaim are barred by the applicable statutes of limitations.

13. The financial transactions described, as loans in paragraph 9 of the counterclaim were not loans but instead were attempts by defendant/counter plaintiff to hide his/her illegal conduct. Therefore, current attempts to collect those funds, calling them loans, are subject to the affirmative defense of illegality.

14. Certain of the acts complained of by in his/her counterclaim were acts, which he/she agreed to or invited. Consequently, is now barred by estoppel from complaining of