

**IN THE CIRCUIT COURT OF                      COUNTY, MISSISSIPPI**  
**PLAINTIFF**

**VS.**

**NO.**

**DEFENDANT**

**ANSWER**

COMES NOW the Defendant, \_\_\_\_\_, by its attorneys, \_\_\_\_\_, \_\_\_\_\_ and \_\_\_\_\_, and for its answer to plaintiff's complaint would show unto the Court as follows, to-wit:

1. Defendant admits/denies the allegations contained in Paragraph One of plaintiff's complaint.
2. Defendant admits/denies the allegations contained in Paragraph Two of plaintiff's complaint.
3. Defendant admits/denies plaintiff's employment, but denies that he/she was injured as claimed.
4. Defendant admits/denies the allegations contained in Paragraph Four of plaintiff's complaint.
5. Defendant admits/denies the allegations contained in Paragraph Five of plaintiff's complaint.
6. Defendant admits/denies the allegations contained in Paragraph Six of plaintiff's complaint.
7. Defendant admits/denies the allegations contained in Paragraph Seven, including subparagraphs 7(a), 7(b), 7(c), 7(d), 7(e), 7(f), 7(g) and 7(h) of plaintiff's complaint.
8. Defendant admits/denies the allegations contained in Paragraph Eight of plaintiff's complaint, and further requests this Court to strike the allegations of Paragraph Eight that state that defendants "withheld and concealed vital information regarding Plaintiff's condition to the further detriment of Plaintiff. The Defendant failed to exercise reasonable care and/or competence in obtaining and communicating such false information and in withholding and concealing such information. The Defendant intended that Plaintiff rely upon information communicated to Plaintiff by Defendant and Plaintiff did, in fact, rely upon such information" for reasons that as a matter of law, defendant is not required to respond to plaintiff in money damages under the provisions of the Federal Employer's Liability Act for the alleged acts or omissions.
9. Defendant admits/denies the allegations contained in Paragraph Nine of plaintiff's complaint.

10. Defendant admits/denies the allegations contained in Paragraph Ten of plaintiff's complaint.

11. Defendant admits/denies the allegations contained in Paragraph Eleven of plaintiff's complaint, and further denies that plaintiff was injured to the extent claimed, and affirmatively allege that plaintiff's injuries, if any, were caused in whole or in part by the negligent acts or omissions of plaintiff all in mitigation of any damages sought herein.

Defendant further affirmatively alleges that plaintiff has failed to file his/her lawsuit within the time allowed by the applicable Statute of Limitations, and is thereby barred from seeking recovery.

Respectfully submitted,

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Attorney for

Of Counsel:

Telephone:  
MSB #  
Attorney for