

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

, AND
CORRECTIONAL OFFICIALS, DEFENDANTS

ANSWER

COMES NOW, , and , the Defendant(s) in the above styled and numbered cause, by and through counsel, and files this their Answer and defenses to Plaintiff's Amended Civil Rights Complaint, and in support thereof, would respectfully show unto the Court as follows:

PARTIES

1. The Defendant(s) the allegations set forth under paragraphs 1 through 11 of Plaintiff(s) Complaint entitled "Parties."

JURISDICTION

12. The Defendant(s) the allegations set forth under paragraph 12 of Plaintiff(s) Complaint entitled "Jurisdiction."

STATEMENT OF THE FACTS

13. The Defendant(s) the allegations set forth under paragraph 13 of Plaintiff(s) Complaint entitled "Statement of The Facts."

14. The Defendant(s) the allegations set forth under paragraph 14 of Plaintiff(s) Complaint entitled "Statement Of The Facts."

15. The Defendant(s) the allegations set forth under paragraph 15 of Plaintiff(s) Complaint entitled "Statement of The Facts."

16. The Defendant(s) the allegations set forth under paragraph 16 of Plaintiff(s) Complaint entitled "Statement of The Facts."

17. The Defendant(s) that called male/female inmates to his/her office but deny remainder of the allegations set forth under paragraph 17 of Plaintiff(s) Complaint entitled "Statement of The Facts."

18. The Defendant(s) the allegations set forth under paragraph 18 of Plaintiff(s) Complaint entitled "Statement of The Facts."

19. The Defendant(s) the allegations set forth under paragraph 19 of Plaintiff(s) Complaint entitled "Statement of The Facts."

20. The Defendant(s) the allegations set forth under paragraph 20 of Plaintiff(s) Complaint entitled "Statement of The Facts."

21. The Defendant(s) the allegations set forth under paragraph 21 of Plaintiff(s) Complaint entitled "Statement of The Facts."

22. The Defendant(s) the allegations set forth under paragraph 22 of Plaintiff(s) Complaint entitled "Statement of The Facts."

23. The Defendant(s) the allegations set forth under paragraph 23 of Plaintiff(s) Complaint entitled "Statement of The Facts."

24. The Defendant(s) the allegations set forth under paragraph 24 of Plaintiff(s) Complaint entitled "Statement of The Facts."

25. The Defendant(s) the allegations set forth under paragraphs 25 of Plaintiff(s) Complaint entitled "Statement of The Facts."

26. The Defendant(s) the allegations set forth under paragraph 26 of Plaintiff(s) Complaint entitled "Statement of The Facts."

27. The Defendant(s) the allegations set forth under paragraph 27 of Plaintiff(s) Complaint entitled "Statement of The Facts."

28. The Defendant(s) the allegations set forth under paragraph 28 of Plaintiff(s) Complaint entitled "Statement of The Facts."

29. The Defendant(s) the allegations set forth under paragraph 29 of Plaintiff(s) Complaint entitled "Statement of The Facts."

30. The Defendant(s) the allegations set forth under paragraph 30 of Plaintiff(s) Complaint entitled "Statement of The Facts."

31. The Defendant(s) the allegations set forth under paragraph 31 of Plaintiff(s) Complaint entitled "Statement of The Facts."

32. The Defendant(s) the allegations set forth under paragraph 32 of Plaintiff(s) Complaint entitled "Statement of The Facts."

33. The Defendant(s) the allegations set forth under paragraph 33 of Plaintiff(s) Complaint entitled "Statement of The Facts."

34. The Defendant(s) the allegations set forth under paragraph 34 of Plaintiff(s) Complaint entitled "Statement of The Facts."

35. The Defendant(s) the allegations set forth under paragraph 35 of Plaintiff(s) Complaint entitled "Statement of The Facts."

36. The Defendant(s) the allegations set forth under paragraph 36 of Plaintiff(s) Complaint entitled "Statement of The Facts."

37. The Defendant(s) the allegations set forth under paragraph 37 of Plaintiff(s) Complaint entitled "Statement of The Facts."

38. The Defendant(s) the allegations set forth under paragraph 38 of Plaintiff(s) Complaint entitled "Statement of The Facts."

39. The Defendant(s) the allegations set forth under paragraph 39 of Plaintiff(s) Complaint entitled "Statement of The Facts."

40. The Defendant(s) the allegations set forth under paragraph 40 of Plaintiff(s) Complaint entitled "Statement of The Facts."

41. The Defendant(s) the allegations set forth under paragraph 41 of Plaintiff(s) Complaint entitled "Statement of The Facts."

42. The Defendant(s) lack knowledge, therefore the allegations set forth under paragraph 42 of Plaintiff(s) Complaint entitled "Statement of The Facts."

43. The Defendant(s) the allegations set forth under paragraph 43 of Plaintiff(s) Complaint entitled "Statement of The Facts."

44. The Defendant(s) the allegations set forth under paragraph 44 of Plaintiff(s) Complaint entitled "Statement of The Facts."

45. The Defendant(s) the allegations set forth under paragraph 45 of Plaintiff(s) Complaint entitled "Statement of The Facts."

46. The Defendant(s) the allegations set forth under paragraph 46 of Plaintiff(s) Complaint entitled "Statement of The Facts."

47. The Defendant(s) the allegations set forth under paragraph 47 of Plaintiff(s) Complaint entitled "Statement of The Facts."

48. The Defendant(s) the allegations set forth under paragraph 48 of Plaintiff(s) Complaint entitled "Statement of The Facts."

49. The Defendant(s) the allegations set forth under paragraph 49 of Plaintiff(s) Complaint entitled "Statement of The Facts."

50. The Defendant(s) the allegations set forth under paragraph 50 of Plaintiff(s) Complaint entitled "Statement of The Facts."

51. The Defendant(s) the allegations set forth under paragraph 51 of Plaintiff(s) Complaint entitled "Statement of The Facts."

52. The Defendant(s) the allegations set forth under paragraph 52 of Plaintiff(s) Complaint entitled "Statement of The Facts."

53. The Defendant(s) lack knowledge, therefore the allegations set forth under paragraph 53 of Plaintiff(s) Complaint entitled "Statement of The Facts."

54. The Defendant(s) lack knowledge, therefore the allegations set forth under paragraph 54 of Plaintiff(s) Complaint entitled "Statement of The Facts."

55. The Defendant(s) lack knowledge, therefore the allegations set forth under paragraph 55 of Plaintiff(s) Complaint entitled "Statement of The Facts."

56. The Defendant(s) the allegations set forth under paragraph 56 of Plaintiff(s) Complaint entitled "Statement of The Facts."

57. The Defendant(s) the allegations set forth under paragraph 57 of Plaintiff(s) Complaint entitled "Statement of The Facts."

58. The Defendant(s) the allegations set forth under paragraph 58 of Plaintiff(s) Complaint entitled "Statement of The Facts."

59. The Defendant(s) the allegations set forth under paragraph 59 of Plaintiff(s) Complaint entitled "Statement of The Facts."

60. The Defendant(s) the allegations set forth under paragraph 60 of Plaintiff(s) Complaint entitled "Statement of The Facts."

CLAIM I.

61. The Defendant(s) the allegations set forth under paragraph 61 of Plaintiff(s) Complaint entitled "Claim."

CLAIM II.

62. The Defendant(s) the allegations set forth under paragraph 62 of Plaintiff(s) Complaint entitled "Claim."

CLAIM III.

63. The Defendant(s) the allegations set forth under paragraph 63 of Plaintiff(s) Complaint entitled "Claim."

CLAIM IV.

64. The Defendant(s) the allegations set forth under paragraph 64 of Plaintiff(s) Complaint entitled "Claim."

CLAIM V.

65. The Defendant(s) the allegations set forth under paragraph 65 of Plaintiff(s) Complaint entitled "Claim."

CLAIM VI.

66. The Defendant(s) the allegations set forth under paragraph 66 of Plaintiff(s) Complaint entitled "Claim."

CLAIM VII.

67. The Defendant(s) the allegations set forth under paragraph 67 of Plaintiff(s) Complaint entitled "Claim."

CLAIM VIII.

68. The Defendant(s) the allegations set forth under paragraph 68 of Plaintiff(s) Complaint entitled "Claim."

CLAIM IX.

69. The Defendant(s) the allegations set forth under paragraph 69 of Plaintiff(s) Complaint entitled "Claim."

CLAIM X.

70. The Defendant(s) the allegations set forth under paragraph 70 of Plaintiff(s) Complaint entitled "Claim."

CLAIM XI.

71. The Defendant(s) the allegations set forth under paragraph 71 of Plaintiff(s) Complaint entitled "Claim."

CLAIM XII.

The Defendant(s) the allegations set forth under paragraph 72 of Plaintiff(s) Complaint entitled "Claim."

CLAIM XIII.

The Defendant(s) the allegations set forth under paragraph 73 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XIV.

The Defendant(s) the allegations set forth under paragraph 74 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XV.

The Defendant(s) the allegations set forth under paragraph 75 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XVI.

The Defendant(s) the allegations set forth under paragraph 76 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XVII.

The Defendant(s) the allegations set forth under paragraph 77 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XVIII.

The Defendant(s) the allegations set forth under paragraph 78 of Plaintiff(s)
Complaint entitled "Claim."

CLAIM XIX.

79. The Defendant(s) the allegations set forth under paragraph 79 and
sub-paragraphs of Plaintiff(s) Complaint entitled "Claim."

CLAIM XX.

79. The Defendant(s) the allegations set forth under paragraph 79(sic) of
Plaintiff(s) Complaint entitled Claim."

CLAIM XXI.

80. The Defendant(s) the allegations set forth under paragraph 80 of
Plaintiff(s) Complaint entitled "Claim."

CLAIM XXII.

81. The Defendant(s) the allegations set forth under paragraph 81 of Plaintiff(s) Complaint entitled "Claim."

The Defendant(s) that Plaintiff is entitled to any relief whatsoever set forth in Plaintiff(s) paragraphs A, B, C, D, and the sub-paragraphs of Plaintiff(s) Complaint.

AFFIRMATIVE MATTER/DEFENSES

AND NOW, having fully answered Plaintiff(s) Complaint paragraph by paragraph, the Defendant(s) incorporate each answer thereto as if fully stated herein and hereby sets forth their defenses to said Complaint, in the affirmative or as otherwise provided by law, to which he/she is entitled as follows:

1. Fails to state a claim as to the Defendant(s).
2. The Court lacks jurisdiction over the subject matter as to the Defendant(s).

WHEREFORE THESE PREMISES CONSIDERED, the Defendant(s) denies that the Plaintiff is entitled to the relief demanded by Plaintiff in his/her Complaint or to any relief against them, or any one of them, in any form or amount whatsoever, and moves this Honorable Court for an Order dismissing Plaintiff(s) Complaint against Defendant(s) with prejudice, at Plaintiff(s) costs.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for