

responds to the numbered paragraphs of the Complaint in sequence and incorporates its affirmative defenses states above.

I. Admitted.

II. Admitted.

III. admits the Plaintiff's medical records indicate he/she sustained his/her injury on or about , , in the manner set forth in the Complaint. admits that the Plaintiff's medical records indicate he/she saw Dr. on or about , , in connection with this injury. further admits that the medical records indicate was admitted to on , until he/she was discharged on , .

IV. admits that the medical records indicate that Plaintiff saw Dr. on or about , , complaining of continued pain in connection with the injury complained of in this action. further admits that Dr. admitted Plaintiff to on , , and that he/she was discharged on , .

V. admits that claims were submitted to it by Drs. and and by , which claims were paid pursuant to the terms of the policy. admits it did not pay the claim from for the hospitalization charges because hospitalization was not medically necessary. All remaining allegations or fact are denied.

VI. admits it paid Dr. 's claim and that it did not pay the claim of . Again, affirmatively states that the hospitalization was not medically necessary pursuant to the terms of the policy and, thus, was not covered. denies that the Plaintiff obtained pre-certification for his/her entire stay at . specifically denied pre-certification for each day of the hospitalization except for a preliminary pre-certification for , , based on the oral representations relayed to by representatives of that certain treatment would be provided to the Plaintiff . After review of the medical records, confirmed the appropriateness of denial of pre-certification for each day except , and further determined that actual treatment for was not medically necessary for inpatient care.

VII. admits that the Plaintiffs contacted it on several occasions concerning the denial of the hospital claim. denies that the Plaintiffs were ever led to believe that the claim would be paid. specifically denied pre-certification for each day of the hospitalization except for a preliminary pre-certification for , , based on the oral representations relayed to by representatives of that certain treatment would be provided to the Plaintiff . admits that on , , that it forwarded Plaintiffs a letter informing them that the denial of the claims had been reviewed internally as well as by an outside consulting physician and that the outside consulting physician's opinion was that the hospitalization was not medically necessary. denies that the Plaintiff obtained pre-certification for his/her entire stay at .

VIII. Admitted. denies that the Plaintiff is entitled to the relief sought in the Complaint or to any relief whatsoever.

WHEREFORE, requests that the Plaintiffs' Complaint be dismissed with prejudice and all costs be taxed to the Plaintiffs. additionally requests all further relief the Court may deem proper.

DATED, this the day of , .

Respectfully submitted,

BY:

CERTIFICATE OF SERVICE

I, , hereby certify that I have this day caused to be mailed by United States mail, postage prepaid, a true and correct copy of the above and foregoing ANSWER to the following counsel of record:

This the day of , .
