

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ COUNTY  
STATE OF \_\_\_\_\_

\_\_\_\_\_  
Petitioner/Plaintiff,  
Vs. NO. \_\_\_\_\_  
\_\_\_\_\_  
Respondent/Defendant

**ANSWER AND DEFENSES**

COMES NOW the Defendant, \_\_\_\_\_, by and through its attorneys of record herein, and files this its answer and defenses to the complaint and for answer says as follows:

**FIRST DEFENSE**

Answering the allegations of the complaint, paragraph by paragraph, this Defendant says as follows:

1.1. Admitted based upon information and belief.

1.2. This Defendant denies that it delivered and installed a mobile home for \_\_\_\_\_. The remaining allegations contained in this paragraph are admitted based upon information and belief.

1.3. Admitted.

1.4. \_\_\_\_\_ admits that it sold a mobile home to \_\_\_\_\_.  
\_\_\_\_\_ denies that it delivered and installed the mobile home.

1.5. Admitted based upon information and belief.

1.6. Denied.

1.7. Denied.

1.8. Denied.

1.9. Denied.

1.10 Denied.

1.11. Denied.

#### SECOND DEFENSE

Any award of punitive damages in this action as sought by the Plaintiff would violate the rights of this Defendant under the Constitution of the United States of America and the Constitution of the State of \_\_\_\_\_, including but not limited to those provisions which provide for due process in the avoidance of excessive fines and penalties. Any award of punitive damages against this Defendant without guidelines, which meet the minimal requirements of due process, would violate the constitutional rights of this Defendant.

#### THIRD DEFENSE

The accident and injuries complained of in the complaint filed herein resulted solely from the negligence of the Plaintiff.

#### FOURTH DEFENSE

Alternatively, the Plaintiffs' negligence contributed to the cause of accident and any damages should be reduced accordingly.

THIS the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Respectfully submitted,

Dated: \_\_\_\_\_

Name: \_\_\_\_\_  
Title:

Address:  
Address:  
City, State, Zip:  
Phone:  
Fax:  
E-Mail:  
Attorney No.:

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_, do hereby certify that I have this day mailed,  
U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to  
\_\_\_\_\_, at the following address;  
\_\_\_\_\_

THIS the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_