{{p include\_docx\_template('include\_CaseCaption.docx',caption\_title = 'LATE ANSWER',caption\_subtitle='MOTION TO FILE ANSWER AND DISCOVERY AS IF TIMELY FILED') }}

Now comes the Defendant (the "Tenant") and moves that this Court allow the Tenant to file a Summary Process Answer & Counterclaims and Discovery as if timely filed. In support thereof, the Tenant states:

l. The Tenant was not represented by counsel and was unaware of his/her legal rights with respect to responding to the Landlord’s eviction complaint or the right to conduct discovery so as to have information in advance to be able to defend against eviction and to pursue any counterclaims the Tenant may have.

2. The Tenant has meritorious defenses to this action.

The Defendant's proposed Answer and Request for Discovery are attached.

3. Granting this motion will cause no prejudice to the Landlord.

WHEREFORE, the Tenant requests that this Court grant his/her Motion to File Answer and Discovery as if Timely Filed, accept the filing of his/her Summary Process Answer & Counterclaims and Discovery, and continue this matter for two weeks to allow the parties time to prepare their defenses and claims and/or to respond to discovery.

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