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Attorneys for Defendant
ANNETTE REARDEN

UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

In the Matter of the Complaint of)	
)	
JOSEPHA A. CAMPINHA-BACOTE d/b/a)	
TRANSCULTURAL C.A.R.E. ASSOCIATES,)	
)	
Plaintiff,)	
)	
vs.)	
)	
ANNETTE REARDEN,)	
)	Case No.: 3:10-CN-00139-TMB
Defendant.)	
_____)	

ANSWER TO COMPLAINT

COMES NOW defendant Annette Rearden, by and through counsel Angstman Law

Office, and for answer to plaintiff's complaint admits, denies and alleges as follows:

INTRODUCTION

1. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in the first sentence of paragraph 1 of the

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complaint and therefore these allegations are denied. Defendant Annette Rearden denies the remaining allegations in paragraph 1 of the complaint.

THE PARTIES

2. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 2 of the complaint and therefore these allegations are denied.

3. Defendant Annette Rearden admits the allegations in paragraph 3 of the complaint.

JURISDICTION

4. No answer is required in paragraph 4 of the complaint.

5. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 5 of the complaint and therefore these allegations are denied.

VENUE

6. Defendant Annette Rearden admits the allegations in paragraph 6 of the complaint.

BACKGROUND

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7. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 7 of the complaint and therefore these allegations are denied.

8. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 8 of the complaint and therefore these allegations are denied.

9. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 9 of the complaint and therefore these allegations are denied.

10. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 10 of the complaint and therefore these allegations are denied.

11. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 11 of the complaint and therefore these allegations are denied.

12. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 12 of the complaint and therefore these allegations are denied.

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13. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 13 of the complaint and therefore these allegations are denied.

14. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 14 of the complaint and therefore these allegations are denied.

15. Defendant Annette Rearden admits the allegations in paragraph 15 of the complaint.

16. Defendant Annette Rearden denies the allegations in paragraph 16 of the complaint.

17. Defendant Annette Rearden denies the allegations in paragraph 17 of the complaint.

18. Defendant Annette Rearden is without sufficient information to form a belief as to the truth of the allegations in paragraph 18 of the complaint and therefore these allegations are denied.

19. Defendant Annette Rearden admits the allegations in paragraph 19 of the complaint.

20. Defendant Annette Rearden admits the allegations in paragraph 20 of the complaint.

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21. Defendant Annette Rearden admits the allegations in paragraph 21 of the complaint.

COUNT I

22. Defendant Annette Rearden incorporates by reference all previous aspects of its answer set forth in paragraphs 1-21. Defendant is not obligated to answer remaining allegations in paragraph 22.

23. Defendant Annette Rearden denies the allegations in paragraph 23 of the complaint.

24. Defendant Annette Rearden denies the allegations in paragraph 24 of the complaint.

25. Defendant Annette Rearden denies the allegations in paragraph 25 of the complaint.

AFFIRMATIVE DEFENSES

1. Failure to state a claim for which relief can be granted.
2. Fair use pursuant to 17 U.S.C. Section 107.
3. Defendant reserves the right to supplement her affirmative defenses as discovery progresses.

WHEREFORE, Defendant Annette Rearden prays for the following relief:

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1. That plaintiffs take nothing and judgment be entered in favor of defendant;
2. For costs, interest, and attorney's fees incurred in defending this action; and
3. For other relief this Court deems necessary and proper.

DATED this 2nd day of September, 2010, at Bethel, Alaska.

ANGSTMAN LAW OFFICE
Attorneys for Annette Rearden

By: s/ Myron Angstman
Myron Angstman
Bar No. 7410057

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September, 2010, a true and accurate copy of the foregoing document was sent to:

Avonte D. Campinha-Bacote, Esq
Transcultural C.A.R.E. Associates
11108 Huntwicke Place
Cincinnati, Ohio 45241

via fax
(513) 469-1764

By: s/ Myron Angstman

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