

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

ROBERT ANDERSON,

Plaintiff,

v.

ROB WOLCHECK, NEW WORLD
COMMUTATIONS OF DETROIT INC.
(aka WJBK Fox 2 Detroit), ANDREW
JOHNSON, OVIE ALDEA, OVIE TRUCKING, INC.,
WILLIE GILMORE, CRAIGSLIST INC.,
LIVE TRUCKING INC., RIPOFF REPORT
CANDICE MCALIFF, KEVENADA THOMPASOM,

Defendants.

Case No. 2018-000254-CZ
Hon. Jennifer Faunce

Robert Anderson, Pro Per
21537 Tanglewood
St. Clair Shores, MI 48082
(586) 344-3030

Michael J. Leavitt (P45366)
Sullivan & Leavitt, P.C.
Attorney for Defendants Ovie Aldea &
Ovie Logistics Express
P.O. Box 5490
Northville, MI 48167
(248) 349-3980
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**DEFENDANTS' OVIE ALDEA AND OVIE LOGISTICS EXPRESS'
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT**

NOW COME the Defendants, Ovie Aldea and Ovie Logistics Express Only, by and through their attorneys, the Law Offices of Sullivan & Leavitt, P.C., and for their Answer and Affirmative Defenses to Plaintiff's Complaint, state as follows:

THE PARTIES

1. Defendants, Aldea and Ovie Logistics Express ("Aldea and OLE") can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint because these allegations makes no sense whatsoever and leaves Plaintiff to his proofs.
11. Defendants Aldea and OLE admit the allegations contained in Paragraph 11 of Plaintiff's Complaint.
12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
13. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 13 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
14. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 14 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
15. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 15 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
16. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 16 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendant Aldea admits the allegation contained in Paragraph 4 of Plaintiff's Complaint.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

JURISDICTION AND VENUE

4B. Defendants Aldea and OLE deny the allegations contained in Paragraph 4B of Plaintiff's Complaint as those allegations are completely untrue.

4A. Defendants Aldea and OLE deny the allegations contained in Paragraph 4A of Plaintiff's Complaint as those allegations are completely untrue.

3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained

OPERATIVE FACTS

proofs.

in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

10. Defendants Aldea and OLE can neither admit nor deny the allegations contained

proofs.

in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

9. Defendants Aldea and OLE can neither admit nor deny the allegations contained

proofs.

in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

8. Defendants Aldea and OLE can neither admit nor deny the allegations contained

UNLAWFUL TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS

COUNT #1

proofs.

in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

10. Defendants Aldea and OLE can neither admit nor deny the allegations contained

proofs.

in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

4C. Defendants Aldea and OLE deny the allegations contained in Paragraph 4C of Plaintiff's Complaint as those statements are completely untrue.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
11. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 11 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
13. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 13 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
14. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 14 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

15. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 15 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
16. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 16 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
17. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 17 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
18. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 18 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
19. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 19 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
20. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 20 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
21. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 21 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

22. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 22 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

23. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 23 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

24. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 24 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

25. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 25 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

26. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 26 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

27. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 27 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

28. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 28 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

29. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 29 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

30. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 30 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

31. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 31 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

32. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 32 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

33. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 33 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

34. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 34 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

35. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 35 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

36. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 36 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

37. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 37 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

38. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 38 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

39. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 39 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

40. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 40 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

41. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 41 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

42. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 42 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

43. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 43 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

44. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 44 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

45. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 45 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

46. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 46 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

47. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 47 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

48. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 48 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

49. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 49 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

50. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 50 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

51. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 51 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

52. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 52 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

53. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 53 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

54. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 54 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

55. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 55 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

56. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 56 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

- 57. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 57 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 58. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 58 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 59. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 59 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 60. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 60 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 61. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 61 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 62. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 62 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 63. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 63 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

RELIEF SOUGHT FOR COUNT #1
UNLAWFUL TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS
MONETARY DAMAGES OF \$11,574,817.00

64. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 64 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

65. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 65 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

66. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 66 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

67. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 67 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

68. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 68 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

69. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 69 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

70. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

WHEREFORE, Defendants, Aldea and OLE only, pray for a judgment of no cause for actions in their favor and against Plaintiff together with court costs and reasonable attorney fees so wrongfully sustained in defense of this frivolous action filed by Plaintiff

COUNT #2

UNLAWFUL TORTIOUS INTERFERENCE OF BUSINESS EXPECTATIONS

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
11. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 11 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
13. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 13 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

14. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 14 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

15. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 15 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

16. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 16 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

17. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 17 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

18. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 18 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

19. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 19 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

20. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 20 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

21. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 21 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

22. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 22 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

23. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 23 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

24. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 24 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

25. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 25 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

26. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 26 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

27. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 27 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

28. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 28 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

29. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 29 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

30. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 30 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

31. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 31 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

32. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 32 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

33. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 33 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

34. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 34 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

- 35. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 35 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 36. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 36 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 37. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 37 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 38. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 38 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 39. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 39 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 40. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 40 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
- 41. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 41 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

42. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 42 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

43. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 43 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

44. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 44 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

45. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 45 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

46. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 46 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

47. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 47 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

48. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 48 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

49. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 49 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

50. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 50 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

51. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 51 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

52. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 52 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

53. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 53 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

54. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 54 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

55. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 55 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

56. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 56 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

57. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 57 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

58. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 58 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

59. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 59 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

60. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 60 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

61. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 61 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

62. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 62 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

63. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 63 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

64. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 64 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

65. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 65 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

66. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 66 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

67. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 67 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

68. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 68 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

69. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 69 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

70. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

71. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 71 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

72. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 72 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

WITH BUSINESS RELATIONSHIPS

WRONGFUL INTERFERENCE

COUNT #3

WHEREFORE, Defendants, Aldea and OLE only, pray for a judgment of no cause for actions in their favor and against Plaintiff together with court costs and reasonable attorney fees so wrongfully sustained in defense of this frivolous action filed by Plaintiff.

TORTIOUS INTERFERENCE OF BUSINESS EXPECTATIONS

TOTAL RELIEF SOUGHT COUNT #2

70. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

71. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 71 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

72. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 72 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

11. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 11 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

13. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 13 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

14. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 14 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

15. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 15 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

16. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 16 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

17. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 17 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
18. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 18 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
19. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 19 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
20. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 20 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
21. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 21 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
22. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 22 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
23. Defendants Aldea and OLF can neither admit nor deny the allegations contained in Paragraph 23 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

24. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 24 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

25. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 25 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

26. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 26 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

27. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 27 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

28. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 28 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

29. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 29 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

30. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 30 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

31. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 31 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

32. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 32 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

33. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 33 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

34. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 34 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

35. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 35 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

36. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 36 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

37. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 37 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

38. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 38 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
39. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 39 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
40. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 40 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
41. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 41 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
42. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 42 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
43. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 43 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
44. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 44 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

45. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 45 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

46. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 46 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

47. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 47 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

48. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 48 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

49. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 49 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

50. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 50 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

51. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 51 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

52. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 52 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

53. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 53 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

54. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 54 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

55. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 55 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

56. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 56 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

57. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 57 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

58. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 58 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

59. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 59 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
60. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 60 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
61. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 61 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
62. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 62 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
63. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 63 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
64. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 64 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
65. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 65 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

NEGLIGENT MISREPRESENTATION

COUNT #4

so wrongfully sustained in defense of this frivolous action filed by Plaintiff. actions in their favor and against Plaintiff together with court costs and reasonable attorney fees WHEREFORE, Defendants, Aldea and OLE only, pray for a judgment of no cause for

WITH BUSINESS RELATIONSHIPS

WRONGFUL INTERFERENCE

TOTAL RELIEF SOUGHT COUNT #3

66. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 66 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
67. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 67 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
68. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 68 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
69. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 69 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
70. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
11. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 11 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
13. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 13 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
14. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 14 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

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36. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 36 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

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40. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 40 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

41. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 41 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

42. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 42 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

43. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 43 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

44. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 44 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

45. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 45 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

46. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 46 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

47. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 47 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

48. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 48 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

49. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 49 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

50. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 50 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
51. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 51 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
52. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 52 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
53. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 53 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
54. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 54 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
55. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 55 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
56. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 56 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

57. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 57 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

58. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 58 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

59. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 59 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

60. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 60 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

61. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 61 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

62. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 62 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

63. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 63 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

TOTAL RELIEF SOUGHT COUNT #4
NEGLIGENCE MISREPRESENTATION

64. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 64 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

65. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 65 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

66. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 66 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

67. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 67 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

68. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 68 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

69. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 69 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

70. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

1. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 1 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
2. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 2 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
3. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 3 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
4. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 4 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.
5. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 5 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

COUNT #5
CIVIL CONSPIRACY AND INTERFERENCE
WITH CONTRACTUAL RELATIONS

WHEREFORE, Defendants, Aldea and OLE only, pray for a judgment of no cause for actions in their favor and against Plaintiff together with court costs and reasonable attorney fees so wrongfully sustained in defense of this frivolous action filed by Plaintiff.

6. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 6 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

7. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 7 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

8. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 8 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

9. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 9 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

10. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 10 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

11. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 11 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

12. Defendants Aldea and OLE can neither admit nor deny the allegations contained in Paragraph 12 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his proofs.

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Dated: January 26, 2018

/s/ Michael J. Leavitt
Michael J. Leavitt (P45366)
Attorneys for Defendants Aldea and OLE
P.O. Box 5490
Northville, MI 48167
(248) 349-3980
ml@sullivanleavitt.com

SULLIVAN & LEAVITT, P.C.

Respectfully submitted,

so wrongfully sustained in defense of this frivolous action filed by Plaintiff.

actions in their favor and against Plaintiff together with court costs and reasonable attorney fees

WHEREFORE, Defendants, Aldea and OLE only, pray for a judgment of no cause for

NEGLIGENCE MISREPRESENTATION

WITH CONTRACTUAL RELATIONS

REQUESTED RELIEF #5 CIVIL CONSPIRACY AND INTERFERENCE

proofs.

in Paragraph 70 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

70. Defendants Aldea and OLE can neither admit nor deny the allegations contained

proofs.

in Paragraph 69 of Plaintiff's Complaint for lack of specific knowledge and leaves Plaintiff to his

69. Defendants Aldea and OLE can neither admit nor deny the allegations contained

54
44
34

Dated: January 26, 2018

/s/ Michael J. Leavitt
Michael J. Leavitt (P45366)
Attorneys for Defendants Ovie Aldea and OLE
PO Box 5490
Northville, MI 48167
(248) 349-3980
ml@sullivanleavitt.com

SULLIVAN & LEAVITT, P.C.

Respectfully submitted,

- to investigation and discovery into the allegations contained in Plaintiff's Complaint.
10. Defendants hereby reserve the right to amend their Affirmative defenses pursuant
 9. Plaintiff's claims are barred due to impossibility.
 8. Plaintiff's claims are barred due to compromising of settlement.
 7. Plaintiff's claims are barred due to estoppel.
 6. Plaintiff's claims are barred due to statute of frauds.
 5. Plaintiff's claims are barred due to statute of limitations.
 4. Plaintiff's claims are barred due to unclean hands.
 3. The Plaintiff has listed the wrong party to this action.
 2. Plaintiff has failed to join all necessary claims and parties.
 1. Plaintiff has failed to state a cause of action upon which relief may be granted.

for their Affirmative Defenses to Plaintiff's Complaint, state as follows:

(“OLE”), only by and through their attorneys, the Law Offices of Sullivan & Leavitt, P.C., and NOW COMES, the Defendants, Ovie Aldea (“Aldea”) and Ovie Logistics Express

AFFIRMATIVE DEFENSES

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