



Plaintiffs are barred from recovery by the statute of limitations.

**FOURTH DEFENSE**

Plaintiff is barred from recovery by the doctrines of waiver, laches, and estoppel.

**FIFTH DEFENSE**

Defendant reserves the right to assert additional affirmative and other defenses that arise—or have arisen—and reserves the right to amend this Answer to assert such defenses.

**ANSWER:**

Defendant responds to the specifically enumerated paragraphs of Plaintiff's complaint as follows:

1. Defendant is without sufficient knowledge to admit or deny the information contained in this paragraph.
2. Admitted.
3. Defendant is without sufficient knowledge to admit or deny the information contained in this paragraph.
4. Defendant is a resident of Gwinnett County, Georgia.
5. Defendants being a resident of Gwinnett County, Georgia. Defendant is without sufficient knowledge to admit or deny the other information contained in this paragraph.
6. Defendant concedes that Plaintiff is complaining of acts which allegedly occurred on October 5, 2017.

7. Denied.
8. Defendant is without sufficient knowledge to admit or deny the information contained in this paragraph.
9. Defendant is without sufficient knowledge to admit or deny the information contained in this paragraph.
10. Defendant admits to having a duty to behave reasonably under the circumstances and exercise ordinary care, and Defendant denies all other information within this paragraph to the extent that it deviates from said duty.
11. Denied.
12. Defendant concedes that Plaintiff is making a claim for the stated amount.
13. Defendant denies owing Plaintiff a judgment for any amount. Defendant is without sufficient knowledge to admit or deny the other information contained in this paragraph.
14. Defendant concedes that Plaintiff has adopted preceding paragraphs.
15. Denied.
16. Denied.
17. Defendant admits to having a duty to act reasonable under the circumstances and exercise ordinary care. Defendant denies breaching any duties to Plaintiff.
18. Defendant denies being the direct or proximate cause of Plaintiff's alleged injuries. Defendant is without sufficient knowledge to admit or deny the other information contained in this paragraph.

19. Defendant denies being the direct or proximate cause of Plaintiff's alleged injuries. Defendant is without sufficient knowledge to admit or deny the other information contained in this paragraph.

WHEREFORE, Defendant requests that the Court enter judgment in her favor, dismiss Plaintiff's lawsuit with prejudice, and award Defendant all of the costs and attorneys' fees incurred in defending this action and such other, further relief the Court deems just and proper.

Submitted this 12th day of August 2020.

s/Tremaine Ross  
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*Attorney for Defendant*

## CERTIFICATE OF SERVICE

I hereby certify that DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S LAWSUIT was/were served via E-File, email, hand-delivery, private process server, service by the Sheriff, certified mail, and/or USPS mail postage prepaid on the following:

**Marcia Guinyard, Esq.**  
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*Counsel for Plaintiff*

Submitted this 12th day of August 2020.

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