

STATE OF INDIANA)
)SS:
COUNTY OF KOSCIUSKO)

IN THE KOSCIUSKO CIRCUIT COURT
CAUSE NO. 43C01-1511-MI-270

ROBERT H. STINE and,)
MOLLY MCGINNIS STINE,)
Plaintiffs,)
)
)
EPWORTH FOREST)
ADMINISTRATION COMMITTEE, INC.,)
Defendant.)

DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT

COMES NOW the Defendant, Epworth Forest Administration Committee, Inc., by counsel, Bloom Gates & Whiteleather, LLP, and for their answer to Plaintiff's Complaint would state as follows:

1. Defendant is without information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of Plaintiff's Complaint.
2. Defendant admits the allegations contained in paragraph 2 of Plaintiff's Complaint.
3. Defendant denies the allegations contained in paragraph 3 of Plaintiff's Complaint.
4. Defendant denies the allegations contained in paragraph 4 of Plaintiff's Complaint.
5. Defendant is without information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of Plaintiff's Complaint.
6. Defendant is without information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of Plaintiff's Complaint.

7. Defendant denies the allegations contained in paragraph 7 of Plaintiff's Complaint.

AFFIRMATIVE DEFENSES

Defendant, Epworth Forest Administration Committee, Inc., by counsel, and for their further answer and defense to Plaintiff's Complaint, allege and state the following affirmative defenses:

1. Failure to State a Cause of Action. Plaintiff has failed to allege facts sufficient to support a claim against Defendant under Indiana law.

2. Failure to State a Claim. Plaintiff's Complaint does not contain a discernable claim against Defendant.

3. Laches. Plaintiff has failed to timely assert any claim against Defendant.

4. Res Judicata. This Court has previously issued an Order which Order bars this action.

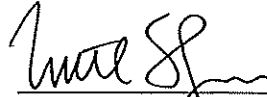
5. Attorney Fees. Pursuant to this Court's Order of April 15, 2014, EFAC has the right to recover its reasonable attorney fees if it prevails in an action related to a pier assignment.

6. Defendant reserves the right to amend or assert additional defenses, should such defenses become apparent throughout the course of discovery.

WHEREFORE, Defendant pray for judgment of the Court that Plaintiff take nothing by way of its Complaint, and for all other right and proper relief in the premises.

Respectfully submitted,

BLOOM GATES & WHITELEATHER

A handwritten signature in black ink, appearing to read "Matt Shipman", written over a horizontal line.

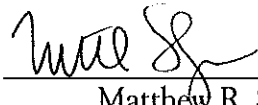
Matthew R. Shipman (Atty. No. 20664-49)
Attorneys for Defendant

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Columbia City, Indiana 46725
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing has been served upon Plaintiff, by first class mail, on the 7th day of January, 2016 at the address of record as follows:

Stephen Snyder
200 W Main St
Syracuse, IN 46567



Matthew R. Shipman