

IN THE CIRCUIT COURT OF MARYLAND FOR MONTGOMERY COUNTY

FORBES COUP :
3813 Chaucer Court :
Monrovia, Maryland 21770 :

Plaintiff :

v. : C.A. No. 49704

CONNECTICUT VALLEY ARMS, INC. :
5988 Peachtree Corners East :
Norcross, Georgia 30071 :

and :

TOM SOTORIS d/b/a :
THE ROCKVILLE TRADING POST :
250 N. Washington Street :
Rockville, Maryland :

Defendants :

ANSWER OF CONNECTICUT VALLEY ARMS, INC.
TO THE PLAINTIFF'S COMPLAINT

Defendant, Connecticut Valley Arms, Inc., by and through counsel Gleason and Flynn, Chartered, answers the Complaint of the Plaintiff as follows:

FIRST DEFENSE

Count I

The Defendant generally denies liability in Count One.

Count II

The Defendant generally denies liability in Count Two.

Count III

The Defendant generally denies liability in Count Three.

SECOND DEFENSE

The Complaint fails to set forth a cause of action upon which relief can be granted.

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THIRD DEFENSE

This action may be barred in whole or in part by the applicable statute of limitations.

FOURTH DEFENSE

The Plaintiff is barred from recovery due to the doctrine of contributory negligence.

FIFTH DEFENSE

The Plaintiff is barred from recovery due to the doctrine of assumption of the risk.

SIXTH DEFENSE

If the Plaintiff suffered any injury or losses, it was a result of the acts of a party or parties over whom this Defendant had no control.

SEVENTH DEFENSE

The Plaintiff did not use the product for its intended purpose.

EIGHTH DEFENSE

This Defendant did not warrant as alleged.

NINTH DEFENSE

This Defendant hereby reserves the right to assert those defenses that may become known as a result of the discovery in this matter.

TENTH DEFENSE

Any and all other claims or allegations contained in the Complaint not otherwise expressly admitted or denied herein, are hereby denied.

WHEREFORE, the Defendant, Connecticut Valley Arms, Inc., having fully answered the Complaint respectfully requests:

1. That the plaintiff's Complaint be dismissed with prejudice;
2. That it be awarded the costs incurred as a result of this suit; and
3. That it be awarded such further relief as this Court deems proper.

Respectfully submitted,

GLEASON AND FLYNN, CHARTERED

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Counsel for Connecticut Valley Arms, Inc.

CERTIFICATE OF SERVICES

I HEREBY CERTIFY that a copy of the foregoing was mailed, postage prepaid, this 12th day of January, 1990 to

Gary K. Stearman, Esq.
2 Wisconsin Circle, Suite 1000
Chevy Chase, Maryland 20815

Kevin H. Brown, Esq.
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