



6. Defendants restate and reallege each and every response contained in Paragraphs One (1) through Five (5) of their Answer, as if fully rewritten herein.

7. Defendants admit that on or about December 7, 2009, Plaintiff Susan Black and Defendant Donald Bews were involved in an automobile accident on Huron Church Road in the City of Windsor, County of Essex, and Country of Canada. Defendants deny the remaining allegations contained in Paragraph Nine (9) of Plaintiffs' Complaint.

8. Defendants admit at the time of the accident, Plaintiff Susan Black was transporting a horse. Defendants are without sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph Ten (10) of Plaintiffs' Complaint and, therefore, deny the same.

9. Defendants deny the allegations contained in Paragraphs Eleven (11) and Twelve (12) of Plaintiffs' Complaint.

10. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraphs Thirteen (13) and Fourteen (14) of Plaintiffs' Complaint, and, therefore, deny the same.

11. Defendants deny the allegations contained in Paragraphs Fifteen (15) and Sixteen (16) of Plaintiffs' Complaint.

12. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph Seventeen (17) of Plaintiffs' Complaint and, therefore, deny the same.

13. Defendants restate and reallege each and every response contained in Paragraphs One (1) through Twelve (12) of their Answer, as if fully rewritten herein.

14. Defendants deny the allegations contained in Paragraphs Nineteen (19), Twenty (20), Twenty-One (21), Twenty-Two (22), and Twenty-Three (23) of Plaintiffs' Complaint.

15. Defendants restate and reallege each and every response contained in Paragraphs One (1) through Fourteen (14) of their Answer, as if fully rewritten herein.

16. Defendants deny the allegations contained in Paragraphs Twenty-Five (25) and Twenty-Six (26) of Plaintiffs' Complaint.

17. Defendants restate and reallege each and every response contained in Paragraphs One (1) through Sixteen (16) of their Answer, as if fully rewritten herein.

18. Defendants deny the allegations contained in Paragraph Twenty-Eight (28) of Plaintiffs' Complaint.

19. Defendants restate and reallege each and every response contained in Paragraphs One (1) through Eighteen (18) of their Answer, as if fully rewritten herein.

20. Defendants deny the allegations contained in Paragraphs Thirty (30), Thirty-One (31), Thirty-Two (32), and Thirty-Three (33) of Plaintiffs' Complaint.

21. Defendants deny any and all allegations not specifically admitted herein.

**SECOND DEFENSE:**

22. Plaintiffs have failed to state a claim upon which relief can be granted against these answering Defendants.

**THIRD DEFENSE:**

23. Plaintiffs' claims are barred due to a lack of personal jurisdiction over these answering Defendants.

**FOURTH DEFENSE:**

24. Plaintiffs' claims are barred due to insufficiency of process and/or insufficiency of service of process.

**FIFTH DEFENSE:**

25. Plaintiffs' injuries and/or damages were caused by independent, intervening, and/or superseding causes, not under the control of these answering Defendants.

**SIXTH DEFENSE:**

26. Plaintiff Susan Black's conduct, whether characterized as contributory negligence or assumption of the risk, bars Plaintiffs' recovery, or reduces Plaintiffs' recovery in proportion to such fault.

**SEVENTH DEFENSE:**

27. Plaintiffs have failed to mitigate their damages and, therefore, Plaintiffs' claims against these answering Defendants are barred in whole or in part.

**EIGHTH DEFENSE:**

28. Plaintiffs have failed to state a claim for punitive damages.

**NINTH DEFENSE:**

29. Defendants hereby assert those defenses set forth in Rule 8 and 12 of the Ohio and/or Federal Rules of Civil Procedure that may be applicable to this action.

**TENTH DEFENSE:**

30. Defendants hereby assert those defenses set forth in the Ontario and Canadian Rules of Civil Procedure that may be applicable to this action.

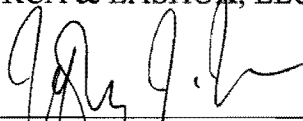
**ELEVENTH DEFENSE:**

31. Defendants hereby reserve the right to raise all additional affirmative defenses as they may become apparent through discovery.

**WHEREFORE**, having fully answered Plaintiffs' Complaint, Defendants Donald Bews and Warren Gibson Ltd. respectfully request that Plaintiffs' Complaint be dismissed, at Plaintiffs' cost.

Respectfully submitted,

JURCA & LASHUK, LLC



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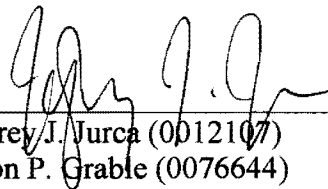
[jjurca@jurcalashuk.com](mailto:jjurca@jurcalashuk.com)

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*Attorney for Defendants Donald Bews and  
Warren Gibson Ltd.*

**JURY DEMAND**

Defendants, by and through counsel, hereby demand that the issues be tried before a jury of eight (8).



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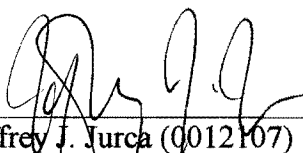
Jeffrey J. Jurca (0012107)

Jason P. Grable (0076644)

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that the foregoing was sent via the Court's electronic delivery system, this 4<sup>th</sup> day of March, 2011, to the following:

Michael T. Edwards, Esq.  
41 East Main Street  
Enon, Ohio 45323  
*Attorney for Plaintiffs*

  
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Jeffrey J. Jurca (0012107)  
Jason P. Grable (0076644)