

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

Harold-Ray Stanley,)
)
Plaintiff,)
v.)
)
The Honorable Jack Grate, et al.,)
) Case No. 06-0752-CV-W-GAF
Defendants.)

SEPARATE ANSWER OF DEFENDANT LES D. WIGHT, II
TO PLAINTIFF'S COMPLAINT

COMES NOW defendant Les D. Wight, II, by and through his attorneys, and for his Separate Answer to plaintiff's Complaint states:

1. This defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1 and therefore denies same.

2. This defendant, in answer to paragraph 2, admits that dissolution proceedings were commenced in the Circuit Court of Jackson County Missouri in Case No. DR96-08993, and further admits that the Court's record in that matter speaks for itself. This defendant denies the allegations of paragraph 2 to the extent inconsistent therewith.

3. For his answer to paragraph 3, this defendant states that the orders and agreements respecting the property of Marcia Stanley and of plaintiff speak for themselves in all particulars. This

defendant denies the allegations of paragraph 3 to the extent inconsistent therewith.

4. For his answer to paragraph 4, this defendant states that the agreements or awards respecting the property of Marcia Stanley and plaintiff speak for themselves in all particulars. This defendant denies the allegations of paragraph 4 to the extent inconsistent therewith.

5. This defendant, in answer to paragraph 5, states that the Court's record speaks for itself as to the alimony ordered by the Court and the payments made pursuant to that Court's order. This defendant denies the allegations of paragraph 5 to the extent inconsistent with the Court's record.

6. In answer to paragraph 6, this defendant states that the Court's record speaks for itself as to its filings and their date. This defendant denies the allegations of paragraph 6 to the extent inconsistent with the Court's record, and further lacks information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 6.

7. In answer to paragraph 7, this defendant states that the Court's file speaks for itself as to what was filed therein and what orders were entered and their dates. This defendant denies the allegations of paragraph 7 to the extent inconsistent therewith.

8. In answer to paragraph 8, this defendant states that the Court's file speaks for itself as to the orders entered by the Court. This defendant denies the allegations of paragraph 8 to the extent inconsistent therewith, and further states it lacks information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 8.

9. In answer to paragraph 9, this defendant states that the Court's file speaks for itself as to the date and content of the orders entered by the Court. This defendant denies the allegations of paragraph 9 to the extent inconsistent therewith.

10. For his answer to paragraph 10, this defendant states that this Court's file speaks for itself as to what was filed with this Court in Case No. 05-0281-CV-W-GAF. This defendant denies that the documents filed effected a removal of the state court proceeding. This defendant further states that the Court's file speaks for itself as to the documents filed with the Court and their content. This defendant denies the allegations of paragraph 10 to the extent that they are inconsistent with Court's file.

11. This defendant lacks knowledge or information sufficient to admit or deny the allegations of contact with plaintiff's counsel on March 25, 2005 as alleged in paragraph 11 as well as the allegations of transmission of documents by plaintiffs to third

parties, but this defendant admits receiving a faxed document pertaining to supposed removal.

12. This defendant, in answer to paragraph 12, states that the Court's record speaks for itself as to the proceedings before it. This defendant denies the allegations of paragraph 12 to the extent inconsistent with the Court's record. This defendant denies the legal conclusion that removal of the state court proceeding had been effected.

13. For his answer to paragraph 13, this defendant states that this Court's file speaks for itself as to the orders entered by the Court and their date, and this defendant denies the allegations of paragraph 13 to the extent inconsistent with the Court's file. This defendant denies the allegations of paragraph 13 respecting the contention that the federal proceeding was a removed case.

14. For his answer to paragraph 14, this defendant admits that this Court dismissed the action bearing Case No. 05-0281-CV-W-GAF and that the Court's file speaks for itself as to the date and content of the Court's orders and of the parties' filings in that case. This defendant denies the allegations of paragraph 14 to the extent inconsistent therewith. This defendant admits that there was no order of remand.