

IN THE CIRCUIT COURT OF MARYLAND FOR MONTGOMERY COUNTY

FORBES COUP :
Plaintiff :
v. : C.A. No. 49704
CONNECTICUT VALLEY ARMS, INC. :
and :
TOM SOTORIS d/b/a :
THE ROCKVILLE TRADING POST :
Defendants :

ANSWER OF CONNECTICUT VALLEY ARMS, INC.
TO THE SECOND AMENDED COMPLAINT

Defendant, Connecticut Valley Arms, Inc. by and through counsel, Gleason & Flynn, Chartered answers the Second Amended 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.

Count IV

The Defendant generally denies liability in Count Four.

SECOND DEFENSE

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

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FILED
BETTIE A. SKELTON
CLERKS OFFICE
MONTGOMERY CO. MD.

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 as 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

Count IV of the Second Amended Complaint should be struck as being untimely filed.

TENTH DEFENSE

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

ELEVENTH DEFENSE

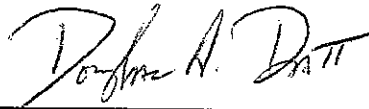
Any and all other claims or allegations contained in the Second Amended Complaint not otherwise expressly admitted or denied herein, are hereby denied.

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

1. That the plaintiff's Second Amended 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



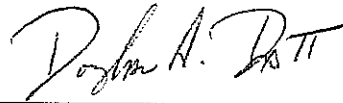
Douglas A. Datt
2275 Research Boulevard
Suite 200
Rockville, Maryland 20850
(301) 417-0099
Counsel for Connecticut Valley
Arms, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was mailed, postage prepaid, this 26th day of December, 1990 to

Robert Sokolove, Esquire
2 Wisconsin Circle, Suite 1000
Chevy Chase, Maryland 20815

Kevin H. Brown, Esquire
Law Offices of Harold A. MacLaughlin
120 East Baltimore Street, #2200
Baltimore, Maryland 21202



Douglas A. Datt