

FOURTH DEFENSE

Responding to the numerated Paragraphs set forth in the Plaintiff's Complaint, Defendant shows as follows:

PARTIES AND JURISDICTION

1.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 1 of Plaintiff's Complaint and therefore denies the same.

2.

Defendant admits the allegations set forth in Paragraph 2 of Plaintiff's Complaint.

3.

Defendant admits the allegations set forth in Paragraph 3 of Plaintiff's Complaint.

4.

Defendant denies the allegations set forth in Paragraph 4 of Plaintiff's Complaint. By way of further response, upon information and belief, Eagles Landing Educational Research Committee, Inc. has been administratively dissolved and no longer exists.

5.

Defendant admits the allegations set forth in Paragraph 5 of Plaintiff's Complaint.

6.

Defendant denies the allegations set forth in Paragraph 6 of Plaintiff's Complaint.

7.

Defendant admits the allegations set forth in Paragraph 7 of Plaintiff's Complaint.

FACTUAL ALLEGATIONS

Clowdus as an advocate for Eagles Landing Cityhood

8.

Defendant admits the allegations set forth in Paragraph 8 of Plaintiff's Complaint.

9.

Defendant denies the allegations set forth in Paragraph 9 of Plaintiff's Complaint.

10.

Defendant denies the allegations set forth in Paragraph 10 of Plaintiff's Complaint.

11.

Defendant denies the allegations set forth in Paragraph 11 of Plaintiff's Complaint.

12.

Defendant admits the allegations set forth in Paragraph 12 of Plaintiff's Complaint.

13.

Defendant denies the allegations set forth in Paragraph 13 of Plaintiff's Complaint.

14.

Defendant denies the allegations set forth in Paragraph 14 of Plaintiff's Complaint.

15.

Defendant denies the allegations set forth in Paragraph 15 of Plaintiff's Complaint.

16.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 16 of Plaintiff's Complaint and therefore denies the same.

17.

Defendant admits the allegations set forth in Paragraph 17 of Plaintiff's Complaint.

Single Non-Threatening Call to Clowdus

18.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 18 of Plaintiff's Complaint and therefore denies the same.

19.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 19 of Plaintiff's Complaint and therefore denies the same.

20.

Defendant denies the allegations set forth in Paragraph 20 of Plaintiff's Complaint.

21.

Defendant denies the allegations set forth in Paragraph 21 of Plaintiff's Complaint.

22.

Defendant denies the allegations set forth in Paragraph 22 of Plaintiff's Complaint.

23.

Defendant denies the allegations set forth in Paragraph 23 of Plaintiff's Complaint.

Clowdus Fabricates Evidence to Police

24.

Defendant denies the allegations set forth in Paragraph 24 of Plaintiff's Complaint.

25.

Defendant admits the allegations set forth in Paragraph 25 of Plaintiff's Complaint.

26.

Defendant denies the allegations set forth in Paragraph 26 of Plaintiff's Complaint.

27.

Defendant denies the allegations set forth in Paragraph 27 of Plaintiff's Complaint.

28.

Defendant denies the allegations set forth in Paragraph 28 of Plaintiff's Complaint.

29.

Defendant denies the allegations set forth in Paragraph 29 of Plaintiff's Complaint.

30.

Defendant denies the allegations set forth in Paragraph 30 of Plaintiff's Complaint.

31.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 31 of Plaintiff's Complaint and therefore denies the same.

32.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 32 of Plaintiff's Complaint and therefore denies the same.

33.

Defendant denies the allegations set forth in Paragraph 33 of Plaintiff's Complaint.

34.

In response to the allegations set forth in Paragraph 34 of Plaintiff's Complaint, the media report will speak for itself. In the event the report is inconsistent with the allegations set forth by the Plaintiff, the Defendant therefore denies the same.

35.

In response to the allegations set forth in Paragraph 35 of Plaintiff's Complaint, the media report will speak for itself. In the event the report is inconsistent with the allegations set forth by the Plaintiff, the Defendant therefore denies the same.

36.

In response to the allegations set forth in Paragraph 36 of Plaintiff's Complaint, the media report will speak for itself. In the event the report is inconsistent with the allegations set forth by the Plaintiff, the Defendant therefore denies the same.

37.

Defendant denies the allegations set forth in Paragraph 37 of Plaintiff's Complaint.

38.

In response to the allegations set forth in Paragraph 38 of Plaintiff's Complaint, the media report will speak for itself. In the event the report is inconsistent with the allegations set forth by the Plaintiff, the Defendant therefore denies the same.

39.

Defendant denies the allegations set forth in Paragraph 39 of Plaintiff's Complaint.

40.

Defendant denies the allegations set forth in Paragraph 40 of Plaintiff's Complaint.

41.

In response to the allegations set forth in Paragraph 41 of Plaintiff's Complaint, the press release will speak for itself. In the event the press release is inconsistent with the allegations set forth by the Plaintiff, the Defendant therefore denies the same.

42.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 42 of Plaintiff's Complaint and therefore denies the same.

43.

Defendant denies the allegations set forth in Paragraph 43 of Plaintiff's Complaint.

Investigation and Arrest on False Police Report

44.

Defendant denies the allegations set forth in Paragraph 44 of Plaintiff's Complaint.

45.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 45 of Plaintiff's Complaint and therefore denies the same.

46.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 46 of Plaintiff's Complaint and therefore denies the same.

47.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 47 of Plaintiff's Complaint and therefore denies the same.

48.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 48 of Plaintiff's Complaint and therefore denies the same.

49.

Defendant denies the allegations set forth in Paragraph 49 of Plaintiff's Complaint.

50.

Defendant denies the allegations set forth in Paragraph 50 of Plaintiff's Complaint.

51.

Defendant denies the allegations set forth in Paragraph 51 of Plaintiff's Complaint.

COUNT ONE **Malicious Prosecution under Georgia Law**

52.

There are no allegations, so no response is required. To the extent a response is required, the Defendant denies the allegations set forth in Paragraph 52 of Plaintiff's Complaint.

53.

Defendant denies the allegations set forth in Paragraph 53 of Plaintiff's Complaint.

54.

Defendant denies the allegations set forth in Paragraph 54 of Plaintiff's Complaint.

55.

Defendant denies the allegations set forth in Paragraph 55 of Plaintiff's Complaint.

56.

Defendant denies the allegations set forth in Paragraph 56 of Plaintiff's Complaint.

57.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 57 of Plaintiff's Complaint and therefore denies the same.

58.

Defendant is without sufficient knowledge to admit or deny the allegations set forth in Paragraph 58 of Plaintiff's Complaint and therefore denies the same.

59.

Defendant denies the allegations set forth in Paragraph 59 of Plaintiff's Complaint.

60.

Defendant denies the allegations set forth in Paragraph 60 of Plaintiff's Complaint.

COUNT TWO
Punitive Damages

61.

Defendant denies the allegations set forth in Paragraph 61 of Plaintiff's Complaint.

COUNT THREE
Attorney's fees under O.C.G.A. § 13-6-11

62.

Defendant denies the allegations set forth in Paragraph 62 of Plaintiff's Complaint.

63.

Defendant denies the allegations set forth in Paragraph 63 of Plaintiff's Complaint.


64.

Any allegations set forth in Plaintiff's Complaint not specifically addressed herein are in fact denied.

WHEREFORE, Defendant prays for the following relief:

- (a) That the claims set forth in the Plaintiff's Complaint be denied;
- (b) That the Court enter an order awarding Defendant the attorney's fees it has incurred in conjunction with this action;
- (c) That the Court grant the Defendant's motion to strike, to dismiss, and for attorney's fees; and
- (d) That the Court grant such other and further relief as this Court may deem equitable and just.

This 23rd day of August, 2021.



R. BRIAN STRICKLAND
Ga. Bar No. 500789
Attorney for Defendant Susan Clowdus and
Associates Realtors, Inc.

SMITH, WELCH, WEBB & WHITE, LLC
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McDonough, Ga. 30253
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STATE OF GEORGIA

COUNTY OF HENRY

VERIFICATION

Personally appeared before me the undersigned officer duly authorized by law to administer oaths, SUSAN K. CLOWDUS, CEO of SUSAN CLOWDUS AND ASSOCIATES REALTORS, INC. states upon oath that the facts set forth in the within and foregoing DEFENDANT SUSAN CLOWDUS AND ASSOCIATES REALTORS, INC.'S ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT are true and correct.

This 19th day of August, 2021.

Susan K. Clowdus

SUSAN K. CLOWDUS, CEO of
Susan Clowdus And Associates
Realtors, Inc.

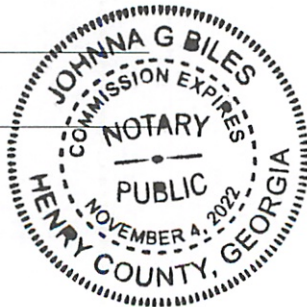
Sworn to and subscribed before me

this 19th day of August, 2021.

Johnna G. Biles
NOTARY PUBLIC

My Commission Expires: _____

County of Commission: _____



CERTIFICATE OF SERVICE

This is to certify that I have served the within and foregoing DEFENDANT SUSAN CLOWDUS AND ASSOCIATES REALTORS, INC. ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT upon all parties by statutory electronic service or by placing the same in the United States mail, addressed to:

**Zack Greenamyre, Esq.
Samantha J. Funt, Esq.
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This 23rd day of August, 2021.



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Attorney for Defendant Susan Clowdus
And Associates Realtors, Inc.

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