

<p>DISTRICT COURT, DENVER COUNTY, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <p>Plaintiff: DEANN HAMPTON</p> <p>v.</p> <p>Defendant: MELISSA HART</p>	<p>DATE FILED January 27, 2020 7:30 AM FILING ID: E31837F7B482E CASE NUMBER: 2019CV34953</p> <p>▲COURT USE ONLY▲</p>
<p><i>Attorneys for Defendant</i> Deana R. Dagner, #11550 Cristina N. Andrews, #50935 DAGNER SCHLUTER MITZNER WERBER, LLC 5105 DTC Parkway, Suite 250 Greenwood Village, CO 80111 Phone Number: 303.221.4661 ddagner@lawincolorado.com candrews@lawincolorado.com</p>	<p>Case Number: 2019CV34953</p> <p>Div.: Ctrm:</p>
<p>ANSWER TO COMPLAINT FOR DAMAGES AND JURY DEMAND</p>	

Defendant, Melissa Hart (“Defendant”), by undersigned counsel, submits the following Answer to Plaintiff’s Complaint for Damages and Jury Demand:

PARTIES AND JURISDICTION

1. Defendant is without information sufficient to form a belief as to the truth of paragraph 1, and therefore denies it.
2. Defendant admits paragraphs 2 and 3.
3. Paragraph 4 states, or purports to state, a legal conclusion requiring no factual response. Defendant denies paragraph 4 to the extent it is inconsistent with the law.

CLAIM FOR RELIEF

4. In response to paragraph 5, Defendant incorporates by reference her paragraphs 1 through 3 above.
5. In response to paragraph 6, Defendant admits on January 3, 2017, Plaintiff was southbound on Central Park Boulevard near the traffic light at Montview Boulevard in Denver,

Colorado. Defendant also admits she was travelling behind Plaintiff, and her vehicle came into contact with the rear of Plaintiff's vehicle. Defendant is without information sufficient to form a belief as to the truth of the remainder of paragraph 6, and therefore denies it.

6. In response to paragraph 7, Defendant admits that her negligence was a cause of the accident.

7. Defendant denies paragraphs 8 and 9.

8. Defendant is without information sufficient to form a belief as to the truth of paragraphs 10 and 11, and therefore denies them.

GENERAL DENIAL

9. Defendant denies each and every allegation in Plaintiff's Complaint for Damages and Jury Demand not specifically and expressly admitted herein.

10. Defendant denies that Plaintiff is entitled to any relief against her.

AFFIRMATIVE DEFENSES

1. Plaintiff's alleged injuries and damages, if any, result from conditions existing before or incurred after the accident complained of, and recovery is therefore precluded or diminished by law.

2. Upon information and belief, Plaintiff has failed to mitigate her alleged injuries, damages and losses.

PRAYER FOR RELIEF

WHEREFORE, Defendant, having fully answered Plaintiff's Complaint for Damages and Jury Demand, requests that Plaintiff's claims be dismissed and that Defendant be awarded her costs incurred in the defense of this suit, and such other relief as may be proper.

JURY DEMAND

DEFENDANT DEMANDS TRIAL BY A JURY OF SIX.

Defendant's address:
2660 N. Clermont Street
Denver, CO 80207

Respectfully submitted,

By /s/Deana R. Dagner
Deana R. Dagner, #11550
Cristina N. Andrews, #50935
DAGNER | SCHLUTER | MITZNER | WERBER, LLC

Attorneys for Defendant
Melissa Hart

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of January, 2020, a true and correct copy of the foregoing **ANSWER TO COMPLAINT FOR DAMAGES AND JURY DEMAND** was served electronically via Colorado Courts E-Filing System upon the following:

Brian Hugen, #40688
Ramos Law
3000 Youngfield St., Ste. 200
Wheat Ridge, CO 80215
Attorney for Plaintiff

s/Sherry J. Cook _____