

1 Donald Plain  
2 4828 River Splash Avenue  
3 Las Vegas, Nevada 89131  
4 *In Proper Person*

5 UNITED STATES DISTRICT COURT

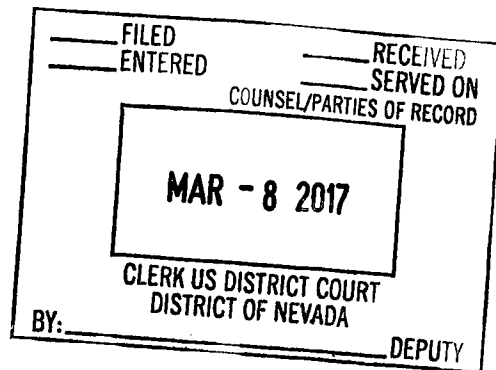
6 DISTRICT OF NEVADA

7 LHF PRODUCTIONS, INC., a )  
8 Nevada corporation, )  
9 Plaintiff, )

Case No.: 2:16-CV-02028-APG-CWH

10 vs. )

11 AGUSTIN BERTOLIN, an )  
12 Individual, MARIA GONZALEZ, an )  
13 Individual, BRIAN KABALA, an )  
14 Individual, JOHN KOEHLI, an )  
15 Individual, DANIEL O'CONNELL, )  
16 an Individual, DAVID POOR, an )  
17 Individual, ANTE SODA, an )  
18 Individual, MATTHEW STEWART )  
19 An individual, AARON )  
20 TAKAHASHI, an individual; and )  
21 JOHN AND JANE DOES, I-10 )  
22 Defendant. )



23 ANSWER

24 COMES NOW, Defendant, Donald Plain, in proper person, hereby files an Answer to  
25 Plaintiff's Complaint as follows:

- 26 1. Answering the allegations contained in Paragraph 1-2 of Plaintiff's Complaint, Defendant  
27 denies, generally and specifically, each and every allegation contained therein and the  
28 whole thereof.

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2. Answering the allegations contained in Paragraph 3-5 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
3. Answering the allegations contained in Paragraph 6-9 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
4. Answering the allegations contained in Paragraph 10 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
5. Answering the allegations contained in Paragraph 11-13 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
6. Answering the allegations contained in Paragraph 14-15 of Plaintiff's Complaint, Defendant denies generally and specifically, each and every allegation contained therein and the whole thereof.
7. Answering the allegations contained in Paragraph 16-18 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
8. Answering the allegations contained in Paragraph 19-26 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

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9. Answering the allegations contained in Paragraph 27-28 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

10. Answering the allegations contained in Paragraph 29-35 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

11. Answering the allegations contained in Paragraph 36-42 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

12. Answering the allegations contained in Paragraph 43-44 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

13. Answering the allegations contained in Paragraph 45-52 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

14. Answering the allegations contained in Paragraph 53-63 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

15. Answering the allegations contained in Paragraph 64-69 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

DEFENDANT ASSERTS THE FOLLOWING AFFIRMATIVE DEFENSES:

FIRST AFFIRMATIVE DEFENSE

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Plaintiff's Complaint fails to state a claim against Defendant upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Defendant alleges that the Plaintiff's claims are barred by the equitable doctrines of laches, unclean hands, and failure to do equity.

THIRD AFFIRMATIVE DEFENSE

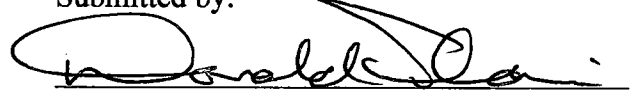
Defendant reserves the right to assert additional affirmative defenses in the event discovery or investigation indicate that additional affirmative defenses are applicable.

PRAYER

WHEREFORE, Defendant prays for judgment as follows:

1. That Plaintiff take nothing by way of this Complaint;
2. For reasonable attorney's fees and costs; and
3. For any such other and further relief as the Court may deem just and proper in the case.

Submitted by:



Donald Plain  
4828 River Splash Avenue  
Las Vegas, Nevada 89131  
*In Proper Person*

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5 (b), and under penalty of perjury I certify that on this 6<sup>th</sup> day of March 2017, I served a copy of ANSWER, by depositing a true and correct copy thereof in the U.S. mail, first class postage prepaid and addressed as follows:

CHARLES C. RAINEY, ESQ.  
HAMRICK & EVANS, LLP  
7670 W. Lake Mead Blvd., Ste. 140  
Las Vegas, Nevada 89148



Maggie Strickland