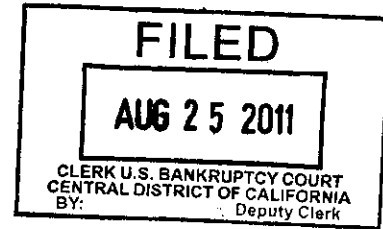


1 James Grover Mateson
2 3463 State Street #207
3 Santa Barbara, CA 93105
4 Phone (808) 344-0534

5 Defendant, In Pro Per



6
7
8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 IN RE: James Grover Mateson,
12 Debtor,

Case No. 9:11-BK-12680-RR
Chapter 7

Adv. Proc No. 9:11-AP-01252

13 -----
14 Bree Walker Lampley,
15 Plaintiff,

**ANSWER TO COMPLAINT TO
DETERMINE DISCHARGEABILITY OF
DEBT**

16 vs.

17 James Grover Mateson,
18 Defendant.

19
20
21 Defendant, James Grover Mateson, answers the complaint for non-dischargeability of
22 debt filed by Plaintiffs, Bree Walker Lampley as follows:

- 23
- 24 1. Defendant admits the allegations in paragraphs 1, 3, 7 and 16.
 - 25 2. Defendant denies the allegations in paragraph 8, 14 and 17.
 - 26 3. Defendant has no information or belief that the allegations in paragraph 2, 4,
27 5, 6, 9, 10, 11, 12, 13, 15 and 18, are true so Defendant denies them.
28

1 **FOURTH AFFIRMATIVE DEFENSE**

2 9. As a Fourth and Separate Affirmative Defense to the complaint and each claim
3 for relief contained therein, this Answering Defendant alleges that Plaintiff's have failed to
4 mitigate their damages, if any they have.
5

6 **FIFTH AFFIRMATIVE DEFENSE**

7 10. As a Fifth and Separate Affirmative Defense to the complaint and each claim
8 for relief contained therein, this Answering Defendant alleges that the alleged acts and
9 omissions of this Answering Defendant were not the actual cause of Plaintiff's purported
10 damages or injury.
11

12 **SIXTH AFFIRMATIVE DEFENSE**

13 11. As a Sixth and Affirmative Defense, to the complaint and each claim for relief
14 contained therein, this Answering Defendant alleges that any statements made by him
15 alleged in the complaint were statements of opinion only, and thus are not actionable.
16

17 **SEVENTH AFFIRMATIVE DEFENSE**

18 12. This Answering Defendant presently has insufficient knowledge and
19 information upon which to form a belief as to whether he may have additional, and as yet
20 unstated, affirmative defenses available. As such, this Answering Defendant reserves the
21 right to seek leave of Court to amend his Answer to assert additional affirmative defenses in
22 the event that discovery reveals facts which render them appropriate.
23

24 WHEREFORE, Defendant prays that Plaintiffs:

- 25 1. Take nothing by their complaint;
- 26 2. That said complaint be dismissed against this Answering Defendant with
27 prejudice;
28

1 3. For the costs of suit incurred herein; and

2 4. For such other and further relief as the court may deem just and proper.

3
4 Dated: August 25, 2011



James Grover Mateson, Pro Se

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1 **PROOF OF SERVICE**

2 I am over the age of 18 and not a party to this action.

3 I am a resident of or employed in the county where the mailing occurred; my
4 business/residence address is: 138 E. Sola Street, Santa Barbara, CA 93101.

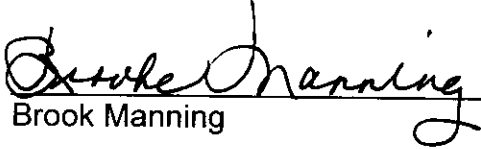
5 On August 25, 2011 I served the foregoing document(s) described as: **ANSWER TO**
6 **COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT** to the following parties:

7 Diane B Weissburg
8 L/O Diane B Weissburg
9 4724 La Villa Marina Unit J
Marina Del Rey, CA 90292

10 [X] (By U.S. Mail) I deposited such envelope in the mail at August 25, 2011,
11 California with postage thereon fully prepaid. I am aware that on motion of the
12 party served, service is presumed invalid if postal cancellation date or
13 postage meter date is more than one day after date of deposit for mailing in
affidavit.

14 I declare under penalty of perjury under the laws of the United States of America and
15 the State of California that the foregoing is true and correct.

16
17 DATED: August 25, 2011

18 
19 Brook Manning