

IN THE IOWA DISTRICT COURT FOR JEFFERSON COUNTY

KORYNN TJADEN DICKEY, SHAWNA
JUSTED, and ALLEN HUSTED,

CAUSE NO: CVEQ004601

Plaintiffs,

AMENDED ANSWER, AFFIRMATIVE
DEFENSES & COUNTERCLAIM

vs.

ADRIAN JEREMY DICKEY

Defendant.

COMES NOW, the Defendant, Adrian Dickey, by and through his attorney, Paul A.

Miller of Miller Law Offices and states the following in reply to Petition:

Paragraph 1-3 are admitted.

1. Paragraph 4 is denied for lack of information.
2. Paragraph 5-7 are admitted.
3. Paragraph 8 is denied.
4. Paragraph 9 is admitted.
5. Paragraph 10 is denied.
6. Paragraph 11-16 are admitted.
7. Paragraph 17 is denied.
8. Paragraph 18 is admitted.
9. Paragraph 19 is denied. Plaintiff had acquiesced or consented/gave her permission to the Defendant to sign Plaintiff's name to the document. Plaintiff also provides this as an affirmative defense to the allegation of forgery.
10. Paragraph 20 is denied for lack of information.
11. Paragraph 21 is admitted.

12. Paragraph 22-26 are denied.
13. Paragraph 27-29 are admitted.
14. Paragraph 30-38 are denied.
15. Paragraph 40-46 are denied.
16. Paragraph 48-55 are denied.
17. Paragraph 56 is admitted.
18. Paragraph 57-70 are denied.

WHEREFORE, the Defendant Adrian Dickey requests the above cause of action be dismissed with costs to Plaintiff. The Defendant also requests the Court to order the Plaintiff to sign over the insurance check to the Defendant.

COUNTERCLAIM

COMES NOW, the Defendant and states the following claim as against all named Plaintiffs in the Petitioner and states as follows in support of counterclaim:

1. Plaintiffs' have made written and oral statements against the Defendant with regards to the title of the vehicle; claiming that the Plaintiff forged the Defendant's name and or did not have the Plaintiff's permission sign her name.
2. That the written and spoken statements are false.
3. That the Plaintiffs have intentionally or caused the statements to be written or spoken.
4. That the false statements are injurious to the Defendant's reputation.
5. That the Defendant has been injured by the written and spoken statements made by the Plaintiff's

WHEREFORE, the Defendant requests the trier of fact to award Defendant damages in the amount of \$120,000.00 against the Plaintiff's jointly and severally.

Respectfully Submitted,

/s/

Paul A. Miller AT0005415

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Attorney for Adrian Dickey