

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMEMBER WILLIAMS, <i>et al.</i>)	CASE NO.: CV-2016-09-3928
)	
Plaintiffs,)	JUDGE BROGAN
)	
vs.)	
)	<u>DEFENDANT MINAS FLOROS D.C.'S</u>
KISLING, NESTICO & REDDICK,)	<u>ANSWER TO PLAINTIFF'S FIFTH</u>
LLC, <i>et al.</i>)	<u>AMENDED COMPLAINT</u>
)	
Defendants.)	
)	<i>Jury Demand Endorsed Hereon</i>

For his Answer to the Fifth Amended Complaint, Defendant Minas Floros , D.C. ("Floros"), states as follows:

First, Floros denies as specifically stated any and all conclusory allegations contained in Plaintiffs' subheadings throughout the Fifth Amended Complaint.

1. Floros can neither admit nor deny the allegations contained in Paragraph 1 of the Fifth Complaint as they are directed to other defendants.

2. To the extent the allegations contained in Paragraph 2 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any quid pro quo relationship, fraudulent narrative fees and/or kickbacks of any kind. As to the remaining allegations of this Paragraph, Floros can neither admit or deny as they are directed to other defendants.

3. Floros can neither admit nor deny the allegations contained in Paragraph 3 of the Fifth Complaint as they are directed to other defendants.

4. Floros can neither admit nor deny the allegations contained in Paragraph 4 of the Fifth Amended Complaint as they are directed to other defendants.

5. Floros can neither admit nor deny the statements and allegations contained in Paragraph 5 of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, provide a summary of the claims made by Plaintiffs in this action.

6. Floros can neither admit nor deny the allegations contained in Paragraph 6 of the Fifth Amended Complaint as they are directed to other defendants.

7. Floros can neither admit nor deny the statements and allegations contained in Paragraph 7 of the Fifth Amended Complaint as they are directed to other defendants and do not seek an admission or denial of fact, but rather, provide a summary of purported evidence to support claims made by Plaintiff in this action.

8. Floros denies the allegations contained in Paragraph 8 of the Fifth Amended Complaint as they are directed to other defendants and for want of knowledge sufficient to form a belief as to their truth or falsity.

9. Floros can neither admit nor deny the statements and allegations contained in Paragraph 9 of the Fifth Amended Complaint as they are directed to other defendants and do not seek an admission or denial of fact, but rather, provide a summary of purported evidence to support claims made by Plaintiff in this action. To the extent applicable, Floros denies each and every allegation contained in Paragraph 9 of the Fifth Amended Complaint.

10. Floros denies the allegations contained in Paragraph 10 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity. Answering further, Floros denies any legal conclusions contained in this Paragraph.

11. To the extent the allegations contained in Paragraph 11 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any unwanted medical care and/or unlawful kickback relationship between himself, Akron Square

Chiropractors and KNR. To the extent the allegations contained in Paragraph 11 are directed to other defendants, Floros can neither admit nor deny them. Finally, Floros denies any legal conclusions contained in this Paragraph.

12. Floros denies the allegations contained in Paragraph 12 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity.

13. Floros denies the allegations contained in Paragraph 13 of the Fifth Amended Complaint as they are directed to other defendants and for want of knowledge sufficient to form a belief as to their truth or falsity.

14. Floros denies the allegations contained in Paragraph 14 of the Fifth Amended Complaint.

15. Floros denies the allegations contained in Paragraph 15 of the Fifth Amended Complaint as they are directed to other defendants and for want of knowledge sufficient to form a belief as to their truth or falsity.

16. Floros denies the allegations contained in Paragraph 16 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity.

17. To the extent the allegations contained in Paragraph 17 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any fraudulent narrative fee, deception or coercion on his part. As to the remaining allegations directed to other defendants, Floros can neither admit nor deny them. Answering further, Floros denies any legal conclusions contained in this Paragraph.

18. Floros can neither admit nor deny the allegations contained in Paragraph 18 of the Fifth Amended Complaint as they are directed to other defendants. Answering further, Floros denies any legal conclusions contained in this Paragraph.

19. Floros denies the allegations contained in Paragraph 19 of the Fifth Amended Complaint as they are directed to other defendants and for want of knowledge sufficient to form a belief as to their truth or falsity.

20. Floros denies the allegations contained in Paragraph 20 of the Fifth Amended Complaint as they are directed to other defendants and for want of knowledge sufficient to form a belief as to their truth or falsity.

21. Floros denies as specifically stated the allegations contained in Paragraph 21 of the Fifth Amended Complaint, specifically denying any legal conclusions, but does not contest jurisdiction is proper in this court.

22. Floros denies as specifically stated the allegations contained in Paragraph 22 of the Fifth Amended Complaint, specifically denying any legal conclusions, but does not contest venue is proper in this court.

23. Floros denies the allegations contained in Paragraph 23 of the Fifth Amended Complaint for want of knowledge to form a belief as to their truth or falsity

24. To the extent the allegations contained in Paragraph 24 of the Fifth Amended Complaint are directed to Floros, they are denied. As to the remaining allegations directed to other defendants, Floros can neither admit nor deny them.

25. To the extent the allegations contained in Paragraph 25 of the Fifth Amended Complaint are directed to Floros, they are denied. As to the remaining allegations directed to other defendants, Floros can neither admit nor deny them.

26. To the extent the allegations contained in Paragraph 26 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of

any quid pro quo referral relationship with KNR. To the extent the allegations contained in this Paragraph are directed to other defendants, Floros can neither admit nor deny them.

27. To the extent the allegations contained in Paragraph 27 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any quid pro quo relationship with KNR. To the extent the allegations contained in this Paragraph are directed to other defendants, Floros can neither admit nor deny them.

28. To the extent the allegations contained in Paragraph 28 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any quid pro quo relationship with KNR. Further answering, Floros denies any legal conclusions contained in this Paragraph.

29. To the extent the allegations contained in Paragraph 29 are directed to Floros, they are denied. As to the remaining allegations, Floros can neither admit nor deny allegations directed to other defendants.

30. To the extent the allegations contained in Paragraph 30 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any reciprocal referral agreements. Further answering, Floros denies any legal conclusions contained in this Paragraph.

31. To the extent the allegations contained in Paragraph 31 of the Fifth Amended Complaint are directed to Floros, they are denied. As to the remaining allegations directed to other defendants, Floros can neither admit nor deny them.

32. To the extent the allegations contained in Paragraph 32 of the Fifth Amended Complaint are directed to Floros, they are denied. Specifically, Floros denies the existence of any

obligation under any kind of quid pro quo arrangement with KNR. As to the remaining allegations directed to other defendants, Floros can neither admit nor deny them.

33. Floros can neither admit nor deny the allegations contained in Paragraph 33 of the Fifth Amended Complaint as they are directed to other defendants. Answering further, Floros denies the existence of any reciprocal referral agreement with KNR.

34. Floros can neither admit nor deny the allegations contained in Paragraph 34 of the Fifth Amended Complaint as they are directed to other defendants. Answering further, Floros denies the existence of any reciprocal referral agreement with KNR.

35. Floros can neither admit nor deny the allegations contained in Paragraph 35 of the Fifth Amended Complaint as they are directed to other defendants.

36. Floros can neither admit nor deny the allegations contained in Paragraph 36 of the Fifth Amended Complaint as they are directed to other defendants.

37. Floros can neither admit nor deny the allegations contained in Paragraph 37 of the Fifth Amended Complaint as they are directed to other defendants.

38. Floros can neither admit nor deny the allegations contained in Paragraph 38 of the Fifth Amended Complaint as they are directed to other defendants.

39. Floros can neither admit nor deny the allegations contained in Paragraph 39 of the Fifth Amended Complaint as they are directed to other defendants.

40. Floros can neither admit nor deny the allegations contained in Paragraph 40 of the Fifth Amended Complaint as they are directed to other defendants.

41. Floros can neither admit nor deny the allegations contained in Paragraph 41 of the Fifth Amended Complaint as they are directed to other defendants.

42. Floros can neither admit nor deny the allegations contained in Paragraph 42 of the Fifth Amended Complaint as they are directed to other defendants.

43. Floros can neither admit nor deny the allegations contained in Paragraph 43 of the Fifth Amended Complaint as they are directed to other defendants.

44. Floros can neither admit nor deny the allegations contained in Paragraph 44 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR and/or "kickback arrangement."

45. Floros can neither admit nor deny the allegations contained in Paragraph 45 of the Fifth Amended Complaint as they are directed to other defendants.

46. Floros can neither admit nor deny the allegations contained in Paragraph 46 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR as described in Paragraph 46.

47. Floros can neither admit nor deny the allegations contained in Paragraph 47 of the Fifth Amended Complaint as they are directed to other defendants.

48. Floros can neither admit nor deny the allegations contained in Paragraph 48 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship as described in Paragraph 48.

49. Floros can neither admit nor deny the allegations contained in Paragraph 49 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo referral relationship and/or kickback relationship as described in Paragraph 49.

50. Floros can neither admit nor deny the allegations contained in Paragraph 50 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship as described in Paragraph 50.

51. Floros can neither admit nor deny the allegations contained in Paragraph 51 of the Fifth Amended Complaint as they are directed to other defendants.

52. Floros can neither admit nor deny the allegations contained in Paragraph 52 of the Fifth Amended Complaint as they are directed to other defendants.

53. Floros can neither admit nor deny the allegations contained in Paragraph 53 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR as described in Paragraph 53.

54. Floros can neither admit nor deny the allegations contained in Paragraph 54 of the Fifth Amended Complaint as they are directed to other defendants. To the extent directed to Floros, the are denied.

55. Floros can neither admit nor deny the allegations contained in Paragraph 55 of the Fifth Amended Complaint as they are directed to other defendants.

56. Floros can neither admit nor deny the allegations contained in Paragraph 56 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR as described in Paragraph 56

57. Floros can neither admit nor deny the allegations contained in Paragraph 57 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship as described in Paragraph 57.

58. Floros can neither admit nor deny the allegations contained in Paragraph 58 of the Fifth Amended Complaint as they are directed to other defendants.

59. Floros can neither admit nor deny the allegations contained in Paragraph 59 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any reward obtained as a result of any quid pro quo relationship with KNR as described in Paragraph 59.

60. Floros can neither admit nor deny the allegations contained in Paragraph 60 of the Fifth Amended Complaint as they are directed to other defendants.

61. Floros can neither admit nor deny the allegations contained in Paragraph 61 of the Fifth Amended Complaint as they are directed to other defendants.

62. Floros can neither admit nor deny the allegations contained in Paragraph 62 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship and/or conflict of interest as described in Paragraph 62.

63. Floros can neither admit nor deny the allegations contained in Paragraph 63 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any fraudulent deduction of a narrative fee.

64. Floros can neither admit nor deny the allegations contained in Paragraph 64 of the Fifth Amended Complaint as they are directed to other defendants. To the extent the allegations contained in Paragraph 64 are directed to Floros, they are denied. Specifically, Floros denies generating any "worthless" narratives.

65. Floros can neither admit nor deny the allegations contained in Paragraph 65 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the allegation that the narrative fee is a "kickback payment" or the result of any quid pro quo relationship.

66. Floros can neither admit nor deny the allegations contained in Paragraph 60 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the allegation that the narrative fee is a "kickback payment" or the result of any quid pro quo relationship.

67. Floros can neither admit nor deny the allegations contained in Paragraph 67 of the Fifth Amended Complaint as they are directed to other defendants.

68. Floros can neither admit nor deny the allegations contained in Paragraph 68 of the Fifth Amended Complaint as they are directed to other defendants. Floros denies any legal conclusions contained in Paragraph 68.

69. Floros can neither admit nor deny the allegations contained in Paragraph 69 of the Fifth Amended Complaint as they are directed to other defendants.

70. Floros can neither admit nor deny the allegations contained in Paragraph 70 of the Fifth Amended Complaint as they are directed to other defendants.

71. Floros can neither admit nor deny the allegations contained in Paragraph 71 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR and/or any "kickback" in the form of a narrative fee as described in Paragraph 71

72. Floros can neither admit nor deny the allegations contained in Paragraph 72 of the Fifth Amended Complaint as they are directed to other defendants. . However, Floros denies the existence of any quid pro quo relationship with KNR and/or any "kickback" in the form of a narrative fee as described in Paragraph 72.

73. Floros can neither admit nor deny the allegations contained in Paragraph 73 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies any

allegation that his reports were "worthless" or that he "merely filled in the blanks" when generating narrative reports.

74. Floros can neither admit nor deny the allegations contained in Paragraph 74 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any fraudulent narrative fee obtained through a quid pro quo relationship with KNR as described in Paragraph 74.

75. Floros can neither admit nor deny the allegations contained in Paragraph 75 of the Fifth Amended Complaint as they are directed to other defendants.

76. Floros can neither admit nor deny the allegations contained in Paragraph 76 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies that he has ever engaged or participated in any fraudulent business practice described in Paragraph 76.

77. Floros can neither admit nor deny the allegations contained in Paragraph 77 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies any conclusory allegations of unlawful conduct.

78. Floros can neither admit nor deny the allegations contained in Paragraph 78 of the Fifth Amended Complaint as they are directed to other defendants.

79. Floros can neither admit nor deny the allegations contained in Paragraph 79 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR.

80. Floros can neither admit nor deny the allegations contained in Paragraph 80 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo referral relationship with KNR.

81. Floros can neither admit nor deny the allegations contained in Paragraph 81 of the Fifth Amended Complaint as they are directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR.

82. Floros can neither admit nor deny the allegations contained in Paragraph 82 of the Fifth Amended Complaint as they are directed to other defendants. To the extent directed to Floros, they are denied.

83. Floros can neither admit nor deny the allegations contained in Paragraph 83 of the Fifth Amended Complaint as they are directed to other defendants. To the extent directed to Floros, they are denied.

84. Floros can neither admit nor deny the allegations contained in Paragraph 84 of the Fifth Amended Complaint as they are directed to other defendants.

85. Floros can neither admit nor deny the allegations contained in Paragraph 85 of the Fifth Amended Complaint as they are directed to other defendants.

86. Floros can neither admit nor deny the allegations contained in Paragraph 86 of the Fifth Amended Complaint as they are directed to other defendants.

87. Floros can neither admit nor deny the allegations contained in Paragraph 87 of the Fifth Amended Complaint as they are directed to other defendants.

88. Floros can neither admit nor deny the allegations contained in Paragraph 88 of the Fifth Amended Complaint as they are directed to other defendants.

89. Floros denies the allegations contained in Paragraph 89 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

90. Floros denies the allegations contained in Paragraph 90 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

91. Floros denies the allegations contained in Paragraph 91 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

92. Floros denies the allegations contained in Paragraph 92 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

93. Floros denies the allegations contained in Paragraph 93 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

94. Floros denies the allegations contained in Paragraph 94 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

95. Floros denies the allegations contained in Paragraph 95 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants.

96. Floros can neither admit nor deny the allegations contained in Paragraph 96 of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, purport to summarize Ohio law. Further answering, Floros denies any legal conclusions contained in this Paragraph.

97. Floros can neither admit nor deny the allegations contained in Paragraph 97 of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, purport to summarize Ohio law. Further answering, Floros denies any legal conclusions contained in this Paragraph.

98. Floros can neither admit nor deny the allegations contained in Paragraph 98 of the Fifth Amended Complaint as they are directed to other defendants.

99. Floros can neither admit nor deny the allegations contained in Paragraph 99 of the Fifth Amended Complaint as they are directed to other defendants.

100. Floros can neither admit nor deny the allegations contained in Paragraph 100 of the Fifth Amended Complaint as they are directed to other defendants.

101. Floros can neither admit nor deny the allegations contained in Paragraph 101 of the Fifth Amended Complaint as they are directed to other defendants.

102. Floros can neither admit nor deny the allegations contained in Paragraph 102 of the Fifth Amended Complaint as they are directed to other defendants.

103. Floros can neither admit nor deny the allegations contained in Paragraph 103 of the Fifth Amended Complaint as they are directed to other defendants.

104. Floros can neither admit nor deny the allegations contained in Paragraph 104 of the Fifth Amended Complaint as they are directed to other defendants.

105. Floros can neither admit nor deny the allegations contained in Paragraph 105 of the Fifth Amended Complaint as they are directed to other defendants.

106. Floros can neither admit nor deny the allegations contained in Paragraph 106 of the Fifth Amended Complaint as they are directed to other defendants.

107. Floros can neither admit nor deny the allegations contained in Paragraph 107 of the Fifth Amended Complaint as they are directed to other defendants.

108. Floros can neither admit nor deny the allegations contained in Paragraph 108 of the Fifth Amended Complaint as they are directed to other defendants.

109. Floros can neither admit nor deny the allegations contained in Paragraph 109 of the Fifth Amended Complaint as they are directed to other defendants.

110. Floros can neither admit nor deny the allegations contained in Paragraph 110 of the Fifth Amended Complaint as they are directed to other defendants.

111. Floros can neither admit nor deny the allegations contained in Paragraph 111 of the Fifth Amended Complaint as they are directed to other defendants.

112. Floros can neither admit nor deny the allegations contained in Paragraph 111 of the Fifth Amended Complaint as they are directed to other defendants.

113. Floros can neither admit nor deny the allegations contained in Paragraph 113 of the Fifth Amended Complaint as they are directed to other defendants.

114. Floros can neither admit nor deny the allegations contained in Paragraph 114 of the Fifth Amended Complaint as they are directed to other defendants.

115. Floros can neither admit nor deny the allegations contained in Paragraph 115 of the Fifth Amended Complaint as they are directed to other defendants.

116. Floros can neither admit nor deny the allegations contained in Paragraph 116 of the Fifth Amended Complaint as they are directed to other defendants.

117. Floros can neither admit nor deny the allegations contained in Paragraph 117 of the Fifth Amended Complaint as they are directed to other defendants.

118. Floros can neither admit nor deny the allegations contained in Paragraph 118 of the Fifth Amended Complaint as they are directed to other defendants.

119. Floros can neither admit nor deny the allegations contained in Paragraph 119 of the Fifth Amended Complaint as they are directed to other defendants.

120. Floros can neither admit nor deny the allegations contained in Paragraph 120 of the Fifth Amended Complaint as they are directed to other defendants.

121. Floros can neither admit nor deny the allegations contained in Paragraph 121 of the Fifth Amended Complaint as they are directed to other defendants.

122. Floros can neither admit nor deny the allegations contained in Paragraph 122 of the Fifth Amended Complaint as they are directed to other defendants.

123. Floros can neither admit nor deny the allegations contained in Paragraph 123 of the Fifth Amended Complaint as they are directed to other defendants.

124. Floros can neither admit nor deny the allegations contained in Paragraph 124 of the Fifth Amended Complaint as they are directed to other defendants.

125. Floros can neither admit nor deny the allegations contained in Paragraph 125 of the Fifth Amended Complaint as they are directed to other defendants.

126. Floros can neither admit nor deny the allegations contained in Paragraph 126 of the Fifth Amended Complaint as they are directed to other defendants.

127. Floros can neither admit nor deny the allegations contained in Paragraph 127 of the Fifth Amended Complaint as they are directed to other defendants.

128. Floros can neither admit nor deny the allegations contained in Paragraph 128 of the Fifth Amended Complaint as they are directed to other defendants.

129. Floros can neither admit nor deny the allegations contained in Paragraph 129 of the Fifth Amended Complaint as they are directed to other defendants.

130. Floros can neither admit nor deny the allegations contained in Paragraph 130 of the Fifth Amended Complaint as they are directed to other defendants.

131. Floros can neither admit nor deny the allegations contained in Paragraph 131 of the Fifth Amended Complaint as they are directed to other defendants.

132. Floros can neither admit nor deny the allegations contained in Paragraph 132 of the Fifth Amended Complaint as they are directed to other defendants.

133. Floros can neither admit nor deny the allegations contained in Paragraph 133 of the Fifth Amended Complaint as they are directed to other defendants.

134. Floros can neither admit nor deny the allegations contained in Paragraph 134 of the Fifth Amended Complaint as they are directed to other defendants.

135. Floros can neither admit nor deny the allegations contained in Paragraph 135 of the Fifth Amended Complaint as they are directed to other defendants.

136. Floros can neither admit nor deny the allegations contained in Paragraph 136 of the Fifth Amended Complaint as they are directed to other defendants.

137. Floros can neither admit nor deny the allegations contained in Paragraph 137 of the Fifth Amended Complaint as they are directed to other defendants.

138. Floros can neither admit nor deny the allegations contained in Paragraph 138 of the Fifth Amended Complaint as they are directed to other defendants.

139. Floros can neither admit nor deny the allegations contained in Paragraph 139 of the Fifth Amended Complaint as they are directed to other defendants.

140. Floros can neither admit nor deny the allegations contained in Paragraph 140 of the Fifth Amended Complaint as they are directed to other defendants.

141. Floros can neither admit nor deny the allegations contained in Paragraph 141 of the Fifth Amended Complaint as they are directed to other defendants.

142. Floros can neither admit nor deny the allegations contained in Paragraph 142 of the Fifth Amended Complaint as they are directed to other defendants.

143. Floros can neither admit nor deny the allegations contained in Paragraph 143 of the Fifth Amended Complaint as they are directed to other defendants.

144. Floros can neither admit nor deny the allegations contained in Paragraph 144 of the Fifth Amended Complaint as they are directed to other defendants.

145. Floros can neither admit nor deny the allegations contained in Paragraph 145 of the Fifth Amended Complaint as they are directed to other defendants.

146. Floros can neither admit nor deny the allegations contained in Paragraph 146 of the Fifth Amended Complaint as they are directed to other defendants.

147. Floros can neither admit nor deny the allegations contained in Paragraph 147 of the Fifth Amended Complaint as they are directed to other defendants.

148. Floros can neither admit nor deny the allegations contained in Paragraph 148 of the Fifth Amended Complaint as they are directed to other defendants.

149. Floros can neither admit nor deny the allegations contained in Paragraph 149 of the Fifth Amended Complaint as they are directed to other defendants.

150. Floros can neither admit nor deny the allegations contained in Paragraph 150 of the Fifth Amended Complaint as they are directed to other defendants.

151. Floros can neither admit nor deny the allegations contained in Paragraph 151 of the Fifth Amended Complaint as they are directed to other defendants.

152. Floros can neither admit nor deny the allegations contained in Paragraph 152 of the Fifth Amended Complaint as they are directed to other defendants.

153. Floros can neither admit nor deny the allegations contained in Paragraph 153 of the Fifth Amended Complaint as they are directed to other defendants.

154. Floros can neither admit nor deny the allegations contained in Paragraph 154 of the Fifth Amended Complaint as they are directed to other defendants.

155. Floros can neither admit nor deny the allegations contained in Paragraph 155 of the Fifth Amended Complaint as they are directed to other defendants.

156. Floros can neither admit nor deny the allegations contained in Paragraph 156 of the Fifth Amended Complaint as they are directed to other defendants.

157. Floros can neither admit nor deny the statements and allegations contained in Paragraph 157 of the Fifth Amended Complaint as they are directed to other defendants.

158. Floros can neither nor deny the allegations contained in paragraph 158 of the Fifth Amended Complaint as they are directed to other defendants.

159. Floros can neither nor deny the allegations contained in paragraph 159 of the Fifth Amended Complaint as they are directed to other defendants.

160. Floros can neither nor deny the allegations contained in paragraph 160 of the Fifth Amended Complaint as they are directed to other defendants.

161. Floros can neither nor deny the allegations contained in paragraph 161 of the Fifth Amended Complaint as they are directed to other defendants.

162. Floros can neither admit nor deny the allegations contained in Paragraph 162 of the Fifth Amended Complaint as they are directed to other defendants.

163. Floros can neither admit nor deny the allegations contained in Paragraph 163 of the Fifth Amended Complaint as they are directed to other defendants.

164. Floros can neither admit nor deny the allegations contained in Paragraph 164 of the Fifth Amended Complaint as they are directed to other defendants.

165. Floros can neither admit nor deny the allegations contained in Paragraph 165 of the Fifth Amended Complaint as they are directed to other defendants.

166. Floros denies any legal conclusions contained in Paragraph 166 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

167. Floros can neither admit nor deny the allegations contained in Paragraph 167 of the Fifth Amended Complaint as they are directed to other defendants.

168. Floros can neither admit nor deny the allegations contained in Paragraph 168 of the Fifth Amended Complaint as they are directed to other defendants.

169. Floros can neither admit nor deny the allegations contained in Paragraph 169 of the Fifth Amended Complaint as they are directed to other defendants.

170. Floros can neither admit nor deny the allegations contained in Paragraph 171 of the Fifth Amended Complaint as they are directed to other defendants.

171. Floros can neither admit nor deny the allegations contained in Paragraph 171 of the Fifth Amended Complaint as they are directed to other defendants.

172. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein.

173. Floros denies any legal conclusions contained in Paragraph 173 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

174. Floros can neither admit nor deny the allegations contained in Paragraph 174 of the Fifth Amended Complaint as they are directed to other defendants.

175. Floros can neither admit nor deny the allegations contained in Paragraph 175 of the Fifth Amended Complaint as they are directed to other defendants.

176. Floros can neither admit nor deny the allegations contained in Paragraph 176 of the Fifth Amended Complaint as they are directed to other defendants.

177. Floros can neither admit nor deny the allegations contained in Paragraph 177 of the Fifth Amended Complaint as they are directed to other defendants.

178. Floros can neither admit nor deny the statements and allegations contained in Paragraph 178, including subparts A-E, of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, a summary of purported classes in this action. Answering further, Floris denies any legal conclusions contained in this Paragraph.

179. Floros denies any legal conclusions contained in Paragraph 179 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

180. Foros can neither admit nor deny the statements and allegations contained in Paragraph 180, including subparts, of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, a summary of purported classes in this action. Answering further, Floris denies any legal conclusions contained in this Paragraph.

181. Floros denies any legal conclusions contained in Paragraph 181 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

182. Floros denies any legal conclusions contained in Paragraph 182 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

183. Floros denies any legal conclusions contained in Paragraph 183 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

184. Floros denies any legal conclusions contained in Paragraph 184 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

185. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein.

186. Floros denies any legal conclusions contained in Paragraph 186 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

187. Floros denies any legal conclusions contained in Paragraph 187 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

188. Floros denies any legal conclusions contained in Paragraph 188 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

189. Floros denies any legal conclusions contained in Paragraph 189 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

190. Floros denies any legal conclusions contained in Paragraph 190 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

191. Floros denies any legal conclusions contained in Paragraph 191 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

192. Floros can neither admit nor deny the allegations contained in Paragraph 192 of the Fifth Amended Complaint as they are directed to other defendants.

193. Floros can neither admit nor deny the allegations contained in Paragraph 193 of the Fifth Amended Complaint as they are directed to other defendants.

194. Floros can neither admit nor deny the allegations contained in Paragraph 194 of the Fifth Amended Complaint as they are directed to other defendants.

195. Floros can neither admit nor deny the allegations contained in Paragraph 195 of the Fifth Amended Complaint as they are directed to other defendants.

196. Floros can neither admit nor deny the allegations contained in Paragraph 196 of the Fifth Amended Complaint as they are directed to other defendants.

197. Floros can neither admit nor deny the allegations contained in Paragraph 197 of the Fifth Amended Complaint as they are directed to other defendants.

198. Floros can neither admit nor deny the allegations contained in Paragraph 198 of the Fifth Amended Complaint as they are directed to other defendants.

199. Floros can neither admit nor deny the allegations contained in Paragraph 199 of the Fifth Amended Complaint as they are directed to other defendants.

200. Floros can neither admit nor deny the allegations contained in Paragraph 200 of the Fifth Amended Complaint as they are directed to other defendants.

201. Floros can neither admit nor deny the allegations contained in Paragraph 201 of the Fifth Amended Complaint as they are directed to other defendants.

202. Floros denies any legal conclusions contained in Paragraph 202 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

203. Floros can neither admit nor deny the allegations contained in Paragraph 203 of the Fifth Amended Complaint as they are directed to other defendants.

204. Floros denies any legal conclusions contained in Paragraph 204 of the Fifth Amended Complaint and can neither admit nor deny allegations directed to other defendants.

205. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

206. Floros denies any legal conclusions contained in Paragraph 206 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

207. Floros denies any legal conclusions contained in Paragraph 207 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

208. Floros can neither admit nor deny the allegations contained in Paragraph 208 of the Fifth Amended Complaint as they are directed to other defendants.

209. Floros can neither admit nor deny the allegations contained in Paragraph 209 of the Fifth Amended Complaint as they are directed to other defendants.

210. Floros can neither admit nor deny the statements and allegations contained in Paragraph 210 of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, attempt to summarize and interpret Ohio case law.

211. Floros can neither admit nor deny the statements and allegations contained in Paragraph 211 of the Fifth Amended Complaint as they do not seek an admission or denial of fact, but rather, attempt to summarize and interpret Ohio case law.

212. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein

213. Floros denies any legal conclusions contained in Paragraph 213 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

214. Floros denies any legal conclusions contained in Paragraph 214 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

215. Floros can neither admit nor deny the allegations contained in Paragraph 215 of the Fifth Amended Complaint as they are directed to other defendants.

216. Floros denies any legal conclusions contained in Paragraph 216 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

217. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein

218. Floros denies any legal conclusions contained in Paragraph 218 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

219. Floros denies any legal conclusions contained in Paragraph 219 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

220. Floros denies any legal conclusions contained in Paragraph 220 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

221. Floros denies the allegations contained in Paragraph 221 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants. However, Floros denies any quid pro quo relationship with KNR and any legal conclusions contained in this Paragraph.

222. Floros denies any legal conclusions contained in Paragraph 222 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

223. Floros denies the allegations contained in Paragraph 223 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants. To the extent the allegations

contained in Paragraph 223 attempt to summarize or interpret Ohio case law, Floros denies any legal conclusions contained in this Paragraph.

224. Floros denies any legal conclusions contained in Paragraph 224 of the Fifth Amended Complaint and can neither admit nor deny any allegations directed to other defendants.

225. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein.

226. Floros denies the allegations contained in Paragraph 226 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants. Answering further, Floros denies any legal conclusions contained in this Paragraph.

227. Floros denies the allegations contained in Paragraph 227 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR and any legal conclusions contained in this Paragraph.

228. Floros denies the allegations contained in Paragraph 228 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can neither admit nor deny allegations directed to other defendants. However, Floros denies the existence of any quid pro quo relationship with KNR and any legal conclusions contained in this Paragraph.

229. Floros denies the allegations contained in Paragraph 229 of the Fifth Amended Complaint for want of knowledge sufficient to form a belief as to their truth or falsity and can

neither admit nor deny allegations directed to other defendants. Answering further, Floros denies any legal conclusions contained in this Paragraph.

230. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer, as if they were fully rewritten herein.

231. Floros can neither admit nor deny the allegations contained in Paragraph 231 of the Fifth Amended Complaint as they are directed to other defendants.

232. Floros can neither admit nor deny the allegations contained in Paragraph 232 of the Fifth Amended Complaint as they are directed to other defendants.

233. Floros can neither admit nor deny the allegations contained in Paragraph 233 of the Fifth Amended Complaint as they are directed to other defendants.

234. Floros can neither admit nor deny the allegations contained in Paragraph 234 of the Fifth Amended Complaint as they are directed to other defendants.

235. Floros can neither admit nor deny the allegations contained in Paragraph 235 of the Fifth Amended Complaint as they are directed to other defendants.

236. Floros can neither admit nor deny the allegations contained in Paragraph 236 of the Fifth Amended Complaint as they are directed to other defendants.

237. Floros can neither admit nor deny the allegations contained in Paragraph 237 of the Fifth Amended Complaint as they are directed to other defendants.

238. Floros can neither admit nor deny the allegations contained in Paragraph 238 of the Fifth Amended Complaint as they are directed to other defendants.

239. Floros can neither admit nor deny the allegations contained in Paragraph 239 of the Fifth Amended Complaint as they are directed to other defendants.

240. Floros can neither admit nor deny the allegations contained in Paragraph 240 of the Fifth Amended Complaint as they are directed to other defendants.

241. Floros can neither admit nor deny the allegations contained in Paragraph 241 of the Fifth Amended Complaint as they are directed to other defendants.

242. Floros can neither admit nor deny the allegations contained in Paragraph 242 of the Fifth Amended Complaint as they are directed to other defendants.

243. Floros can neither admit nor deny the allegations contained in Paragraph 243 of the Fifth Amended Complaint as they are directed to other defendants.

244. Floros can neither admit nor deny the allegations contained in Paragraph 244 of the Fifth Amended Complaint as they are directed to other defendants.

245. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

246. Floros can neither admit nor deny the allegations contained in Paragraph 246 of the Fifth Amended Complaint as they are directed to other defendants.

247. Floros can neither admit nor deny the allegations contained in Paragraph 247 of the Fifth Amended Complaint as they are directed to other defendants.

248. Floros can neither admit nor deny the allegations contained in Paragraph 248 of the Fifth Amended Complaint as they are directed to other defendants.

249. Floros can neither admit nor deny the allegations contained in Paragraph 249 of the Fifth Amended Complaint as they are directed to other defendants.

250. Floros can neither admit nor deny the allegations contained in Paragraph 250 of the Fifth Amended Complaint as they are directed to other defendants.

251. Floros can neither admit nor deny the allegations contained in Paragraph 251 of the Fifth Amended Complaint as they are directed to other defendants.

252. Floros can neither admit nor deny the allegations contained in Paragraph 252 of the Fifth Amended Complaint as they are directed to other defendants.

253. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

254. Floros can neither admit nor deny the allegations contained in Paragraph 254 of the Fifth Amended Complaint as they are directed to other defendants.

255. Floros can neither admit nor deny the allegations contained in Paragraph 255 of the Fifth Amended Complaint as they are directed to other defendants.

256. Floros can neither admit nor deny the allegations contained in Paragraph 256 of the Fifth Amended Complaint as they are directed to other defendants.

257. Floros can neither admit nor deny the allegations contained in Paragraph 257 of the Fifth Amended Complaint as they are directed to other defendants.

258. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

259. Floros can neither admit nor deny the allegations contained in Paragraph 259 of the Fifth Amended Complaint as they are directed to other defendants.

260. Floros can neither admit nor deny the allegations contained in Paragraph 260 of the Fifth Amended Complaint as they are directed to other defendants.

261. Floros can neither admit nor deny the allegations contained in Paragraph 261 of the Fifth Amended Complaint as they are directed to other defendants.

262. Floros can neither admit nor deny the allegations contained in Paragraph 262 of the Fifth Amended Complaint as they are directed to other defendants.

263. Floros can neither admit nor deny the allegations contained in Paragraph 263 of the Fifth Amended Complaint as they are directed to other defendants.

264. Floros can neither admit nor deny the allegations contained in Paragraph 264 of the Fifth Amended Complaint as they are directed to other defendants.

265. Floros can neither admit nor deny the allegations contained in Paragraph 265 of the Fifth Amended Complaint as they are directed to other defendants.

266. Floros can neither admit nor deny the allegations contained in Paragraph 266 of the Fifth Amended Complaint as they are directed to other defendants.

267. Floros can neither admit nor deny the allegations contained in Paragraph 267 of the Fifth Amended Complaint as they are directed to other defendants.

268. Floros can neither admit nor deny the allegations contained in Paragraph 268 of the Fifth Amended Complaint as they are directed to other defendants.

269. Floros can neither admit nor deny the allegations contained in Paragraph 269 of the Fifth Amended Complaint as they are directed to other defendants.

270. Floros can neither admit nor deny the allegations contained in Paragraph 270 of the Fifth Amended Complaint as they are directed to other defendants.

271. Floros can neither admit nor deny the allegations contained in Paragraph 271 of the Fifth Amended Complaint as they are directed to other defendants.

272. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

273. Floros can neither admit nor deny the allegations contained in Paragraph 273 of the Fifth Amended Complaint as they are directed to other defendants.

274. Floros can neither admit nor deny the allegations contained in Paragraph 274 of the Fifth Amended Complaint as they are directed to other defendants.

275. Floros can neither admit nor deny the allegations contained in Paragraph 275 of the Fifth Amended Complaint as they are directed to other defendants.

276. Floros can neither admit nor deny the allegations contained in Paragraph 276 of the Fifth Amended Complaint as they are directed to other defendants.

277. Floros can neither admit nor deny the allegations contained in Paragraph 277 of the Fifth Amended Complaint as they are directed to other defendants.

278. Floros can neither admit nor deny the allegations contained in Paragraph 278 of the Fifth Amended Complaint as they are directed to other defendants.

279. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

280. Floros can neither admit nor deny the allegations contained in Paragraph 280 of the Fifth Amended Complaint as they are directed to other defendants.

281. Floros can neither admit nor deny the allegations contained in Paragraph 281 of the Fifth Amended Complaint as they are directed to other defendants.

282. Floros can neither admit nor deny the allegations contained in Paragraph 282 of the Fifth Amended Complaint as they are directed to other defendants.

283. Floros can neither admit nor deny the allegations contained in Paragraph 283 of the Fifth Amended Complaint as they are directed to other defendants.

284. Floros can neither admit nor deny the allegations contained in Paragraph 284 of the Fifth Amended Complaint as they are directed to other defendants.

285. Floros can neither admit nor deny the allegations contained in Paragraph 285 of the Fifth Amended Complaint as they are directed to other defendants.

286. Floros can neither admit nor deny the allegations contained in Paragraph 286 of the Fifth Amended Complaint as they are directed to other defendants.

287. Floros can neither admit nor deny the allegations contained in Paragraph 287 of the Fifth Amended Complaint as they are directed to other defendants.

288. Floros can neither admit nor deny the allegations contained in Paragraph 288 of the Fifth Amended Complaint as they are directed to other defendants.

289. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

290. Floros can neither admit nor deny the allegations contained in Paragraph 290 of the Fifth Amended Complaint as they are directed to other defendants.

291. Floros can neither admit nor deny the allegations contained in Paragraph 291 of the Fifth Amended Complaint as they are directed to other defendants.

292. Floros can neither admit nor deny the allegations contained in Paragraph 292 of the Fifth Amended Complaint as they are directed to other defendants.

293. Floros can neither admit nor deny the allegations contained in Paragraph 293 of the Fifth Amended Complaint as they are directed to other defendants.

294. Floros can neither admit nor deny the allegations contained in Paragraph 294 of the Fifth Amended Complaint as they are directed to other defendants.

295. Floros can neither admit nor deny the allegations contained in Paragraph 295 of the Fifth Amended Complaint as they are directed to other defendants.

296. Floros can neither admit nor deny the allegations contained in Paragraph 296 of the Fifth Amended Complaint as they are directed to other defendants.

297. Floros can neither admit nor deny the allegations contained in Paragraph 297 of the Fifth Amended Complaint as they are directed to other defendants.

298. Floros can neither admit nor deny the allegations contained in Paragraph 298 of the Fifth Amended Complaint as they are directed to other defendants.

299. Floros can neither admit nor deny the allegations contained in Paragraph 299 of the Fifth Amended Complaint as they are directed to other defendants.

300. Floros can neither admit nor deny the allegations contained in Paragraph 300 of the Fifth Amended Complaint as they are directed to other defendants.

301. Floros can neither admit nor deny the allegations contained in Paragraph 301 of the Fifth Amended Complaint as they are directed to other defendants.

302. Floros can neither admit nor deny the allegations contained in Paragraph 302 of the Fifth Amended Complaint as they are directed to other defendants.

303. Floros can neither admit nor deny the allegations contained in Paragraph 303 of the Fifth Amended Complaint as they are directed to other defendants.

304. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

305. Floros can neither admit nor deny the allegations contained in Paragraph 305 of the Fifth Amended Complaint as they are directed to other defendants.

306. Floros can neither admit nor deny the allegations contained in Paragraph 306 of the Fifth Amended Complaint as they are directed to other defendants.

307. Floros can neither admit nor deny the allegations contained in Paragraph 307 of the Fifth Amended Complaint as they are directed to other defendants.

308. Floros can neither admit nor deny the allegations contained in Paragraph 308 of the Fifth Amended Complaint as they are directed to other defendants.

309. Floros can neither admit nor deny the allegations contained in Paragraph 309 of the Fifth Amended Complaint as they are directed to other defendants.

310. Floros can neither admit nor deny the allegations contained in Paragraph 310 of the Fifth Amended Complaint as they are directed to other defendants.

311. Floros can neither admit nor deny the allegations contained in Paragraph 311 of the Fifth Amended Complaint as they are directed to other defendants.

312. Floros herein reincorporates and restates all of the denials, averments and defenses in the preceding paragraphs of this Answer as if they were fully rewritten herein.

313. Floros can neither admit nor deny the allegations contained in Paragraph 313 of the Fifth Amended Complaint as they are directed to other defendants.

314. Floros can neither admit nor deny the allegations contained in Paragraph 314 of the Fifth Amended Complaint as they are directed to other defendants.

315. Floros can neither admit nor deny the allegations contained in Paragraph 315 of the Fifth Amended Complaint as they are directed to other defendants.

316. Floros can neither admit nor deny the allegations contained in Paragraph 316 of the Fifth Amended Complaint as they are directed to other defendants.

317. Floros can neither admit nor deny the allegations contained in Paragraph 317 of the Fifth Amended Complaint as they are directed to other defendants.

318. Floros can neither admit nor deny the allegations contained in Paragraph 318 of the Fifth Amended Complaint as they are directed to other defendants.

319. Floros can neither admit nor deny the allegations contained in Paragraph 319 of the Fifth Amended Complaint as they are directed to other defendants.

320. Floros can neither admit nor deny the allegations contained in Paragraph 320 of the Fifth Amended Complaint as they are directed to other defendants.

321. Floros can neither admit nor deny the allegations contained in Paragraph 321 of the Fifth Amended Complaint as they are directed to other defendants.

322. Floros can neither admit nor deny the allegations contained in Paragraph 322 of the Fifth Amended Complaint as they are directed to other defendants.

323. Floros denies Plaintiffs' entitlement to any of the requested relief in its "Prayer for Relief," including subparts 1-5.

324. Floros denies all allegations in Plaintiffs' Fifth Amended Complaint, except as expressly admitted in paragraphs 1 through 322 of this Answer.

325. Floros denies all legal conclusions contained in Plaintiffs' Fifth Amended Complaint.

AFFIRMATIVE AND OTHER DEFENSES

1. Plaintiffs' Fifth Amended Complaint fails to state a claim upon which relief can be granted.
2. Plaintiffs have failed to satisfy all or part of the requirements of Civ. R. 23, governing class actions.

3. Plaintiffs failed to plead any set of facts sufficient to sustain their burden of proving that they are representative of any alleged class.

4. To the extent Plaintiffs have suffered any legally cognizable damages (which is denied), the damages were caused solely by Plaintiffs' own conduct or the conduct of others not within Floros' control.

5. To the extent Plaintiffs have suffered any legally cognizable damages (which is denied), they failed to mitigate those damages.

6. One or all of the claims made in Plaintiffs' Fifth Amended Complaint are barred by the doctrine of unclean hands, waiver, estoppel, laches and/or other equitable defenses.

7. Plaintiffs have failed to join all necessary and/or indispensable parties required for a just adjudication of this case.

8. Plaintiffs lack standing to bring and maintain their claims on behalf of the putative classes and standing to pursue, among other claims, their declaratory and injunctive relief.

9. Plaintiffs have failed to join all necessary and/or indispensable parties required for a just adjudication of this case

10. This Court lacks jurisdiction (e.g., personal, subject matter, etc.) over this Floros and case and, therefore, Plaintiffs' Complaint should be dismissed.

11. Plaintiffs' have failed to satisfy conditions precedent, including, without limitation, privity of contract, under the applicable agreements.

12. Plaintiffs' Fifth Amended Complaint rests on baseless factual and legal allegations known by Plaintiffs to be false and/or misleading. Plaintiffs' institution and prosecution of this case under these circumstances constitutes frivolous conduct, in violation

of Ohio Revised Code § 2323.51.

13. Floros did not act in any manner or state of mind which justifies the imposition of punitive damages. Imposing punitive damages against Floros under the circumstances at issue here would violate the Constitution, statutes, and law of Ohio, and the Eighth Amendment excessive fines clause, the due process provisions and the equal protection provisions of the United States Constitution.

14. Any alleged injury or damage claimed by Plaintiffs, or some or all of the purported classes, which Defendant denies, was caused in whole or in part by the intervening and/or superseding acts, events, or omissions of persons or entities.

15. Plaintiffs and some or all of the purported classes have failed to mitigate any damages caused by any purported injury.

16. Plaintiffs' Complaint fails for insufficiency of process and service of process.

17. Plaintiffs' claims are barred, in whole or in part, by the doctrine of accord and satisfaction and novation.

18. Plaintiffs' fraud claims are not pled with particularity as required by Ohio R. Civ.P. 9(b).

19. To the extent Plaintiffs have suffered any legally cognizable damages (which is denied), Floros is entitled to a set off for the amount his fees were discounted as a courtesy to any Plaintiff.

20. Plaintiffs' claims, and some or all of the purported classes, in whole or in part, are barred by operation of the applicable statutes of limitation or other limitation periods.

21. Floros incorporates the affirmative defenses pleaded in all prior Answers filed in this case as if fully rewritten herein.

22. Floros incorporates the Answers of the other Defendants, including but not limited to their prior Answers.

23. Floros incorporates all Motions for Judgment on the Pleadings, Motions to Dismiss, Counterclaims, and related briefs and motions filed in this case as if fully rewritten herein.

24. Floros reserves the right to amend its Answer to assert any additional defenses, cross-claims, counterclaims and/or third-party complaints to the extent that discovery in this matter reveals any basis for the assertion of such defenses.

WHEREFORE, having fully responded to Plaintiffs' Complaint herein, Floros requests that the Complaint be dismissed with prejudice, that it recover its costs, expenses, and reasonable attorney's fees incurred herein, and for such other and further relief as the Court deems just and equitable.

Respectfully submitted,

/s/ Shaun H. Kedir
Shaun H. Kedir (#0082828)
KEDIR LAW OFFICES LLC
1400 Rockefeller Building
614 West Superior Avenue
Cleveland, Ohio 44113
Phone: (216) 696-2852
Fax: (216) 696-3177
shaunkedir@kedirlaw.com
Counsel for Defendant Minas Floros

JURY
DEMAND

A trial by jury is hereby demanded composed of the maximum number of jurors allowable by law.

/s/ Shaun H. Kediri
Shaun H. Kediri (#0082828)

CERTIFICATE OF SERVICE

Counsel served a copy of Answer to Fifth Amended Complaint electronically on this 23rd day of January, 2019. The parties will receive notice of this filing Notice of this filing by operation of the Court's electronic filing system.

/s/ Shaun H. Kediri
Shaun H. Kediri (#0082828)

