

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.                              | ) |                                             |
|                                  | ) | <b><u>DEFENDANT MINAS FLOROS D.C.'S</u></b> |
| KISLING, NESTICO & REDDICK,      | ) | <b><u>ANSWER TO PLAINTIFFS' SIXTH</u></b>   |
| LLC, <i>et al.</i>               | ) | <b><u>AMENDED COMPLAINT</u></b>             |
|                                  | ) |                                             |
| Defendants.                      | ) |                                             |
|                                  | ) | <i>Jury Demand Endorsed Hereon</i>          |

For his Answer to the Sixth 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 Sixth Amended Complaint.

1. To the extent the allegations contained in Paragraph 1 of the Sixth Amended Complaint are directed to Floros, they are denied. As to the remaining allegations of this Paragraph, Floros can neither admit or deny as they are directed to other defendants.

2. To the extent the allegations contained in Paragraph 2 of the Sixth Amended Complaint are directed to Floros, they are denied. As to the remaining allegations of this Paragraph, Floros can neither admit or deny as they are directed to other defendants.

3. Floros denies the allegations contained in Paragraph 3 of the Sixth Complaint.

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

5. Floros can neither admit nor deny the allegations contained in Paragraph 5 of the Sixth Amended Complaint as they are directed to other defendants.

6. To the extent the allegations contained in Paragraph 6 of the Sixth Amended Complaint are directed to Floros, they are denied.

7. Floros denies the allegations contained in Paragraph 7 of the Sixth Complaint.

8. Floros denies the allegations contained in Paragraph 8 of the Sixth 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 denies the allegations contained in Paragraph 9.

10. Floros denies the allegations contained in Paragraph 10 of the Sixth 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 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 Sixth 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 Sixth 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 Sixth 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.

15. Floros denies the allegations contained in Paragraph 15 of the Sixth 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. To the extent the allegations contained in Paragraph 16 of the Sixth Amended Complaint are directed to Floros, they are denied.

17. To the extent the allegations contained in Paragraph 17 of the Sixth Amended Complaint are directed to Floros, they are denied.

18. Floros can neither admit nor deny the allegations contained in Paragraph 18 of the Sixth 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 Sixth 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 Sixth 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 Sixth Amended Complaint.

22. Floros denies as specifically stated the allegations contained in Paragraph 22 of the Sixth Amended Complaint.

23. Floros denies the allegations contained in Paragraph 23 of the Sixth Amended Complaint.

24. To the extent the allegations contained in Paragraph 24 of the Sixth 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 Sixth 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 Sixth 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 Sixth amended Complaint are directed to Floros, they are denied. 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 Sixth Amended Complaint are directed to Floros, they are denied.

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 Sixth Amended Complaint are directed to Floros, they are denied.

31. To the extent the allegations contained in Paragraph 31 of the Sixth Amended Complaint are directed to Floros, they are denied.

32. To the extent the allegations contained in Paragraph 32 of the Sixth Amended Complaint are directed to Floros, they are denied.

33. To the extent the allegations contained in Paragraph 33 of the Sixth Amended Complaint are directed to Floros, they are denied.

34. To the extent the allegations contained in Paragraph 34 of the Sixth Amended Complaint are directed to Floros, they are denied.

35. Floros can neither admit nor deny the allegations contained in Paragraph 35 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations contained in Paragraph 35 of the Sixth Amended Complaint are directed to Floros, they are denied.

36. To the extent the allegations contained in Paragraph 36 of the Sixth Amended Complaint are directed to Floros, they are denied.

37. To the extent the allegations contained in Paragraph 37 of the Sixth Amended Complaint are directed to Floros, they are denied.

38. To the extent the allegations contained in Paragraph 38 of the Sixth Amended Complaint are directed to Floros, they are denied.

39. Floros can neither admit nor deny the allegations contained in Paragraph 39 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

40. Floros can neither admit nor deny the allegations contained in Paragraph 40 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

41. Floros can neither admit nor deny the allegations contained in Paragraph 41 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
42. Floros can neither admit nor deny the allegations contained in Paragraph 42 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
43. Floros can neither admit nor deny the allegations contained in Paragraph 43 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied. To the extent the allegations contained in Paragraph 36 of the Sixth Amended Complaint are directed to Floros, they are denied.
44. Floros can neither admit nor deny the allegations contained in Paragraph 44 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
45. Floros can neither admit nor deny the allegations contained in Paragraph 45 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
46. Floros can neither admit nor deny the allegations contained in Paragraph 46 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
47. Floros can neither admit nor deny the allegations contained in Paragraph 47 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

48. Floros can neither admit nor deny the allegations contained in Paragraph 48 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
49. Floros can neither admit nor deny the allegations contained in Paragraph 49 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
50. Floros can neither admit nor deny the allegations contained in Paragraph 50 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
51. Floros can neither admit nor deny the allegations contained in Paragraph 51 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
52. Floros can neither admit nor deny the allegations contained in Paragraph 52 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
53. Floros can neither admit nor deny the allegations contained in Paragraph 53 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations contained are directed to Floros, they are denied.
54. Floros can neither admit nor deny the allegations contained in Paragraph 54 of the Sixth 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 Sixth Amended Complaint as they are directed to other defendants.

56. Floros can neither admit nor deny the allegations contained in Paragraph 56 of the Sixth 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 Sixth 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 Sixth Amended Complaint as they are directed to other defendants.
59. Floros can neither admit nor deny the allegations contained in Paragraph 59 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
60. Floros can neither admit nor deny the allegations contained in Paragraph 60 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
61. Floros can neither admit nor deny the allegations contained in Paragraph 61 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
62. Floros can neither admit nor deny the allegations contained in Paragraph 62 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
63. Floros can neither admit nor deny the allegations contained in Paragraph 63 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.



64. Floros can neither admit nor deny the allegations contained in Paragraph 64 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
65. Floros can neither admit nor deny the allegations contained in Paragraph 65 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
66. Floros can neither admit nor deny the allegations contained in Paragraph 60 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
67. Floros can neither admit nor deny the allegations contained in Paragraph 67 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
68. Floros can neither admit nor deny the allegations contained in Paragraph 68 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
69. Floros can neither admit nor deny the allegations contained in Paragraph 69 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
70. Floros can neither admit nor deny the allegations contained in Paragraph 70 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

71. Floros can neither admit nor deny the allegations contained in Paragraph 71 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
72. Floros can neither admit nor deny the allegations contained in Paragraph 72 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
73. Floros can neither admit nor deny the allegations contained in Paragraph 73 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
74. Floros can neither admit nor deny the allegations contained in Paragraph 74 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
75. Floros can neither admit nor deny the allegations contained in Paragraph 75 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
76. Floros can neither admit nor deny the allegations contained in Paragraph 76 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
77. Floros can neither admit nor deny the allegations contained in Paragraph 77 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

78. Floros can neither admit nor deny the allegations contained in Paragraph 78 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
79. Floros can neither admit nor deny the allegations contained in Paragraph 79 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
80. Floros can neither admit nor deny the allegations contained in Paragraph 80 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
81. Floros can neither admit nor deny the allegations contained in Paragraph 81 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
82. Floros can neither admit nor deny the allegations contained in Paragraph 82 of the Sixth 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 Sixth 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 Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

85. Floros can neither admit nor deny the allegations contained in Paragraph 85 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
86. Floros can neither admit nor deny the allegations contained in Paragraph 86 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
87. Floros can neither admit nor deny the allegations contained in Paragraph 87 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
88. Floros can neither admit nor deny the allegations contained in Paragraph 88 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
89. Floros denies the allegations contained in Paragraph 89 of the Sixth 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 are directed to Floros, they are denied.
90. Floros denies the allegations contained in Paragraph 90 of the Sixth 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 are directed to Floros, they are denied.
91. Floros denies the allegations contained in Paragraph 91 of the Sixth 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 are directed to Floros, they are denied.

92. Floros denies the allegations contained in Paragraph 92 of the Sixth 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 are directed to Floros, they are denied.

93. Floros denies the allegations contained in Paragraph 93 of the Sixth 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 are directed to Floros, they are denied.

94. Floros denies the allegations contained in Paragraph 94 of the Sixth 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 are directed to Floros, they are denied.

95. Floros denies the allegations contained in Paragraph 95 of the Sixth 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 are directed to Floros, they are denied.

96. Floros denies the allegations contained in Paragraph 96 of the Sixth 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 are directed to Floros, they are denied.

97. Floros denies the allegations contained in Paragraph 97 of the Sixth 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 are directed to Floros, they are denied.
98. Floros can neither admit nor deny the allegations contained in Paragraph 98 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
99. Floros can neither admit nor deny the allegations contained in Paragraph 99 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
100. Floros can neither admit nor deny the allegations contained in Paragraph 100 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
101. Floros can neither admit nor deny the allegations contained in Paragraph 101 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
102. Floros can neither admit nor deny the allegations contained in Paragraph 102 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
103. Floros can neither admit nor deny the allegations contained in Paragraph 103 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

104. Floros can neither admit nor deny the allegations contained in Paragraph 104 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
105. Floros can neither admit nor deny the allegations contained in Paragraph 105 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
106. Floros can neither admit nor deny the allegations contained in Paragraph 106 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
107. Floros can neither admit nor deny the allegations contained in Paragraph 107 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
108. Floros can neither admit nor deny the allegations contained in Paragraph 108 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
109. Floros can neither admit nor deny the allegations contained in Paragraph 109 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
110. Floros can neither admit nor deny the allegations contained in Paragraph 110 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

111. Floros can neither admit nor deny the allegations contained in Paragraph 111 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
112. Floros can neither admit nor deny the allegations contained in Paragraph 111 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
113. Floros can neither admit nor deny the allegations contained in Paragraph 113 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
114. Floros can neither admit nor deny the allegations contained in Paragraph 114 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
115. Floros can neither admit nor deny the allegations contained in Paragraph 115 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
116. Floros can neither admit nor deny the allegations contained in Paragraph 116 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
117. Floros can neither admit nor deny the allegations contained in Paragraph 117 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.



118. Floros can neither admit nor deny the allegations contained in Paragraph 118 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
119. Floros can neither admit nor deny the allegations contained in Paragraph 119 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
120. Floros can neither admit nor deny the allegations contained in Paragraph 120 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
121. Floros can neither admit nor deny the allegations contained in Paragraph 121 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
122. Floros can neither admit nor deny the allegations contained in Paragraph 122 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
123. Floros can neither admit nor deny the allegations contained in Paragraph 123 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
124. Floros can neither admit nor deny the allegations contained in Paragraph 124 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

125. Floros can neither admit nor deny the allegations contained in Paragraph 125 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
126. Floros can neither admit nor deny the allegations contained in Paragraph 126 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
127. Floros can neither admit nor deny the allegations contained in Paragraph 127 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
128. Floros can neither admit nor deny the allegations contained in Paragraph 128 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
129. Floros can neither admit nor deny the allegations contained in Paragraph 129 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
130. Floros can neither admit nor deny the allegations contained in Paragraph 130 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
131. Floros can neither admit nor deny the allegations contained in Paragraph 131 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

132. Floros can neither admit nor deny the allegations contained in Paragraph 132 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
133. Floros can neither admit nor deny the allegations contained in Paragraph 133 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
134. Floros can neither admit nor deny the allegations contained in Paragraph 134 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
135. Floros can neither admit nor deny the allegations contained in Paragraph 135 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
136. Floros can neither admit nor deny the allegations contained in Paragraph 136 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
137. Floros can neither admit nor deny the allegations contained in Paragraph 137 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
138. Floros can neither admit nor deny the allegations contained in Paragraph 138 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

139. Floros can neither admit nor deny the allegations contained in Paragraph 139 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
140. Floros can neither admit nor deny the allegations contained in Paragraph 140 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
141. Floros can neither admit nor deny the allegations contained in Paragraph 141 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
142. Floros can neither admit nor deny the allegations contained in Paragraph 142 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
143. Floros can neither admit nor deny the allegations contained in Paragraph 143 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
144. Floros can neither admit nor deny the allegations contained in Paragraph 144 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
145. Floros can neither admit nor deny the allegations contained in Paragraph 145 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

146. Floros can neither admit nor deny the allegations contained in Paragraph 146 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
147. Floros can neither admit nor deny the allegations contained in Paragraph 147 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
148. Floros can neither admit nor deny the allegations contained in Paragraph 148 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
149. Floros can neither admit nor deny the allegations contained in Paragraph 149 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
150. Floros can neither admit nor deny the allegations contained in Paragraph 150 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
151. Floros can neither admit nor deny the allegations contained in Paragraph 151 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
152. Floros can neither admit nor deny the allegations contained in Paragraph 152 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

153. Floros can neither admit nor deny the allegations contained in Paragraph 153 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
154. Floros can neither admit nor deny the allegations contained in Paragraph 154 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
155. Floros can neither admit nor deny the allegations contained in Paragraph 155 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
156. Floros can neither admit nor deny the allegations contained in Paragraph 156 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
157. Floros can neither admit nor deny the statements and allegations contained in Paragraph 157 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
158. Floros can neither nor deny the allegations contained in paragraph 158 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
159. Floros can neither nor deny the allegations contained in paragraph 159 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

160. Floros can neither nor deny the allegations contained in paragraph 160 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
161. Floros can neither nor deny the allegations contained in paragraph 161 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
162. Floros can neither admit nor deny the allegations contained in Paragraph 162 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
163. Floros can neither admit nor deny the allegations contained in Paragraph 163 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
164. Floros can neither admit nor deny the allegations contained in Paragraph 164 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
165. Floros can neither admit nor deny the allegations contained in Paragraph 165 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
166. Floros denies any legal conclusions contained in Paragraph 166 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

167. Floros can neither admit nor deny the allegations contained in Paragraph 167 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
168. Floros can neither admit nor deny the allegations contained in Paragraph 168 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
169. Floros can neither admit nor deny the allegations contained in Paragraph 169 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
170. Floros can neither admit nor deny the allegations contained in Paragraph 170 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
171. 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.
172. Floros can neither admit nor deny the allegations contained in Paragraph 172 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
173. Floros denies any legal conclusions contained in Paragraph 173 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
174. Floros can neither admit nor deny the allegations contained in Paragraph 174 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.



175. Floros can neither admit nor deny the allegations contained in Paragraph 175 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
176. Floros can neither admit nor deny the allegations contained in Paragraph 176 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
177. 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.
178. Floros denies any legal conclusions contained in Paragraph 178 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
179. Floros denies any legal conclusions contained in Paragraph 179 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
180. Floros denies any legal conclusions contained in Paragraph 180 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
181. 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.
182. Floros denies any legal conclusions contained in Paragraph 183 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

183. Floros denies any legal conclusions contained in Paragraph 183 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
184. Floros denies any legal conclusions contained in Paragraph 184 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
185. Floros denies any legal conclusions contained in Paragraph 185 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
186. Floros denies any legal conclusions contained in Paragraph 186 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
187. 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.
188. Floros denies any legal conclusions contained in Paragraph 188 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
189. Floros denies any legal conclusions contained in Paragraph 189 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
190. Floros denies any legal conclusions contained in Paragraph 190 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

191. Floros denies any legal conclusions contained in Paragraph 191 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
192. Floros can neither admit nor deny the allegations contained in Paragraph 192 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
193. Floros can neither admit nor deny the allegations contained in Paragraph 193 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
194. Floros can neither admit nor deny the allegations contained in Paragraph 194 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
195. Floros can neither admit nor deny the allegations contained in Paragraph 195 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
196. 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.
197. Floros can neither admit nor deny the allegations contained in Paragraph 197 of the Sixth Amended Complaint as they are directed to other defendants.
198. Floros can neither admit nor deny the allegations contained in Paragraph 198 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

199. Floros can neither admit nor deny the allegations contained in Paragraph 199 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
200. Floros can neither admit nor deny the allegations contained in Paragraph 200 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
201. Floros can neither admit nor deny the allegations contained in Paragraph 201 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
202. Floros denies any legal conclusions contained in Paragraph 202 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
203. Floros can neither admit nor deny the allegations contained in Paragraph 203 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
204. Floros denies any legal conclusions contained in Paragraph 204 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
205. Floros denies any legal conclusions contained in Paragraph 205 of the Sixth Amended Complaint and can neither admit nor deny allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

206. Floros denies any legal conclusions contained in Paragraph 206 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
207. Floros denies any legal conclusions contained in Paragraph 207 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied
208. Floros can neither admit nor deny the allegations contained in Paragraph 208 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
209. Floros can neither admit nor deny the allegations contained in Paragraph 209 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
210. 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.
211. Floros denies any legal conclusions contained in Paragraph 211 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
212. Floros denies any legal conclusions contained in Paragraph 212 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
213. Floros denies any legal conclusions contained in Paragraph 213 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

214. Floros denies any legal conclusions contained in Paragraph 214 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
215. Floros can neither admit nor deny the allegations contained in Paragraph 215 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
216. Floros denies any legal conclusions contained in Paragraph 216 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
217. Floros denies any legal conclusions contained in Paragraph 217 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
218. 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.
219. Floros denies any legal conclusions contained in Paragraph 219 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
220. Floros denies any legal conclusions contained in Paragraph 220 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
221. Floros denies any legal conclusions contained in Paragraph 221 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

222. Floros denies any legal conclusions contained in Paragraph 222 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
223. 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.
224. Floros denies any legal conclusions contained in Paragraph 224 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
225. Floros denies any legal conclusions contained in Paragraph 225 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
226. Floros denies any legal conclusions contained in Paragraph 226 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
227. Floros denies any legal conclusions contained in Paragraph 227 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
228. Floros denies any legal conclusions contained in Paragraph 224 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
229. Floros denies any legal conclusions contained in Paragraph 229 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

230. Floros denies any legal conclusions contained in Paragraph 224 of the Sixth Amended Complaint and can neither admit nor deny any allegations directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
231. Floros can neither admit nor deny the allegations contained in Paragraph 231 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
232. Floros can neither admit nor deny the allegations contained in Paragraph 232 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
233. Floros can neither admit nor deny the allegations contained in Paragraph 233 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
234. Floros can neither admit nor deny the allegations contained in Paragraph 234 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied. To the extent the allegations are directed to Floros, they are denied.
235. Floros can neither admit nor deny the allegations contained in Paragraph 235 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
236. Floros can neither admit nor deny the allegations contained in Paragraph 236 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.



237. Floros can neither admit nor deny the allegations contained in Paragraph 237 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
238. 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.
239. Floros can neither admit nor deny the allegations contained in Paragraph 239 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
240. Floros can neither admit nor deny the allegations contained in Paragraph 240 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
241. Floros can neither admit nor deny the allegations contained in Paragraph 241 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
242. Floros can neither admit nor deny the allegations contained in Paragraph 242 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
243. 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.
244. Floros can neither admit nor deny the allegations contained in Paragraph 244 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

245. Floros can neither admit nor deny the allegations contained in Paragraph 245 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
246. Floros can neither admit nor deny the allegations contained in Paragraph 246 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
247. Floros can neither admit nor deny the allegations contained in Paragraph 247 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
248. Floros can neither admit nor deny the allegations contained in Paragraph 248 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied
249. Floros can neither admit nor deny the allegations contained in Paragraph 249 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
250. 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.
251. Floros can neither admit nor deny the allegations contained in Paragraph 251 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
252. Floros can neither admit nor deny the allegations contained in Paragraph 252 of the Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.

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 Sixth Amended Complaint as they are directed to other defendants. To the extent the allegations are directed to Floros, they are denied.
255. Floros denies Plaintiffs' entitlement to any of the requested relief in its "Prayer for Relief," including subparts 1-5.
256. Floros denies all allegations in Plaintiffs' Sixth Amended Complaint, except as expressly admitted in paragraphs 1 through 254 of this Answer.
257. Floros denies all legal conclusions contained in Plaintiffs' Sixth Amended Complaint.
258. Floros reincorporates all denials made in previous Answers.

### **AFFIRMATIVE AND OTHER DEFENSES**

1. Plaintiffs' Sixth 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' Sixth 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' Sixth 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)  
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*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. Kedir  
Shaun H. Kedir (#0082828)

CERTIFICATE OF SERVICE

Counsel served a copy of Answer to Sixth Amended Complaint electronically on this 9th day of August, 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. Kedir \_\_\_\_\_  
Shaun H. Kedir (#0082828)