

+ C (1)
See how attorney Buchanan
Set up the entire
lawsuit to fail.

He Knew what he
was Doing and
The Entire Time I
was going blind and
The staff was ignoring
my Serious medical needs
and physically abusing
me and Destroying
evidence and Camcorder
Footage and hiding
medical records and
Falsifying Documents

The Staff That I Know
of who Took part
in this were
Mayor Scott Batson
Nurse Ann Pecararo
Nurse Bethany Ritter
Warden Teri Bauldaufer
Miss Obianuju Anunike
and many others
Knew about the
Conspiracy going on
with my own
personal injury attorney
Sean Buchanan

See ATTACHMENTS

B (3)

Answer of Defendant,

Sean Buchanan

Let this

happen to me

with his

Legal malpractice

and Conspiracy

IN THE COURT OF CLAIMS OF OHIO

TERRI GARKO

Plaintiff,

-vs-

OHIO DEPARTMENT OF
REHABILITATION AND
CORRECTION,

Defendant.

:

: Case No. 2020-00369JD

: Judge Patrick McGrath

: Magistrate Holly True Shaver

:

:

ANSWER OF DEFENDANT

Now comes the Defendant, Ohio Department of Rehabilitation and Correction (DRC), by and through counsel, and for its Answer to Plaintiff's Complaint, states the following:

FIRST DEFENSE

1. Admit that The Department of Rehabilitation and Correction is a Department of the State of Ohio. Deny for lack of knowledge the citizenship of Plaintiff. All remaining allegations are denied.

2. Admit the allegations in paragraph 2.

3. To the extent that paragraph 3 calls for a legal conclusion, no response is required.

4-6. Admit the allegations in paragraphs 4-6.

7-13. Deny the allegations in paragraphs 7-13.

14. Admit the allegations in paragraph 14.

15-23. Deny the allegations in paragraphs 15-23.

24-29. To the extent paragraphs 24-29 call for legal conclusions, no response is required. All remaining allegations in paragraphs 24-29 are denied.

30. Any remaining allegations not specifically admitted, denied, or denied for lack of knowledge are denied.

SECOND DEFENSE

31. This Court lacks subject matter jurisdiction over all or part of the matters contained in Plaintiff's Complaint.

THIRD DEFENSE

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

FOURTH DEFENSE

33. The negligent and/or intentional acts of Plaintiff, or one or more persons for whose conduct Defendant is not liable, were the intervening, superseding, and active proximate causes of the injuries and damages alleged in the Complaint. Defendant hereby requests apportionment of any such negligence in accordance with Ohio law.

FIFTH DEFENSE

34. Plaintiff's own negligence was the sole proximate or a major contributing cause of the injuries and damages described in the Complaint.

SIXTH DEFENSE

35. Plaintiff's own negligence is greater than any negligence by the Defendant, which is specifically denied, and Plaintiff is therefore barred from recovery.

SEVENTH DEFENSE

36. Defendant is entitled to discretionary immunity from liability.

EIGHTH DEFENSE

37. Plaintiff's claims are barred by the applicable statute of limitations.

NINTH DEFENSE

38. Defendant provides notice that it intends to rely upon and utilize such other defenses as they become available and/or apparent during the course of discovery and hereby reserves the right to amend this Answer to assert such defenses.

WHEREFORE, having fully answered Plaintiff's Complaint, Defendant respectfully requests that this Court dismiss the Complaint in its entirety at Plaintiff's costs.

Respectfully submitted,

DAVE YOST

Ohio Attorney General

/s/ Velda K. Hofacker; /s/ Lauren D. Emery

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