

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAUL DUFFY,)	
)	
Plaintiff,)	
)	
v.)	No. 13-cv-1569
)	
)	Consolidated with:
)	
)	Case No. 13-cv-4342
)	
)	Judge: Honorable John W. Darrah
PAUL GODFREAD, ALAN COOPER, and)	
JOHN DOES 1-10,)	
)	
Defendants.)	

**PLAINTIFFS' CONSOLIDATED ANSWER TO SECOND AMENDED
COUNTERCLAIM**

Plaintiffs/Counterdefendants (“Plaintiffs”) PRENDA LAW, INC. and DUFFY, as and for their answer to Counterdefendants’ Second Amended Counterclaim, state as follows:

Respectfully request that the Court grant them an additional seven (7) days to file a statement of financial condition and/or obtain funds to pay the sanction imposed by the Court.

1. Plaintiffs admit that Cooper was a caretaker for John Steele, but deny the remaining allegations contained in Paragraph 1 of the Counterclaim.
2. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 2 of the Counterclaim, and therefore deny the same.
3. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 3 of the Counterclaim, and therefore deny the same.

4. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 4 of the Counterclaim, and therefore deny the same.
5. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 5 of the Counterclaim, and therefore deny the same.
6. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 6 of the Counterclaim, and therefore deny the same.
7. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 7 of the Counterclaim, and therefore deny the same.
8. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 8 of the Counterclaim, and therefore deny the same.
9. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 9 of the Counterclaim, and therefore deny the same.
10. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 10 of the Counterclaim, and therefore deny the same.
11. Plaintiffs lack information sufficient to admit or deny the allegations contained in Paragraph 11 of the Counterclaim, and therefore deny the same.
12. Plaintiffs admit that God read filed papers in actions pending in Minnesota, but lack information sufficient to admit or deny the remaining allegations in Paragraph 12, and therefore deny the same.
13. Plaintiffs deny the allegations contained in Paragraph 13.
14. Plaintiffs deny the allegations contained in Paragraph 14.
15. Paragraph 15 contains legal conclusions which Plaintiffs are not required to admit or deny.

16. Plaintiffs admit that the lawsuits with captions contained in Paragraph 16 were filed, but deny the remaining allegations contained in Paragraph 16.
17. Plaintiffs admit that the text appears in a complaint, but deny the allegations contained in Paragraph 17.
18. Plaintiffs deny the allegations contained in Paragraph 18.
19. Plaintiffs reallege and restate their answers to Paragraphs 1 through 18 as though fully set forth herein.
20. Plaintiffs deny the allegations contained in Paragraph 20.
21. Plaintiffs deny the allegations contained in Paragraph 21.
22. Plaintiffs deny the allegations contained in Paragraph 22.
23. Plaintiffs deny the allegations contained in Paragraph 23.
24. Plaintiffs admit that the complaints referenced in Paragraph 24 were filed, and this case was removed to this Court.
25. Plaintiffs deny the allegations contained in Paragraph 25.
26. Paragraph 26 contains legal conclusions, which Plaintiffs are not required to admit or deny.
27. Plaintiffs deny the allegations contained in Paragraph 27.
28. Plaintiffs deny the allegations contained in Paragraph 28.
29. Plaintiffs deny the allegations contained in Paragraph 29.
30. Plaintiffs deny the allegations contained in Paragraph 30.
31. Plaintiffs deny the allegations contained in Paragraph 31.
32. Paragraph 32 contains legal conclusions, which Plaintiffs are not required to admit or deny.

33. Paragraph 33 contains legal conclusions, which Plaintiffs are not required to admit or deny.
34. Paragraph 34 contains legal conclusions, which Plaintiffs are not required to admit or deny.
35. Plaintiffs deny the allegations contained in Paragraph 35.
36. Plaintiffs deny the allegations contained in Paragraph 36.
37. Plaintiffs reallege and restate their answers to Paragraphs 1 through 36 as though fully set forth herein.
38. Paragraph 38 contains legal conclusions which Plaintiffs are not required to admit or deny.
39. Plaintiffs deny the allegations contained in Paragraph 39.
40. Plaintiffs deny the allegations contained in Paragraph 40.
41. Plaintiffs deny the allegations contained in Paragraph 41.
42. Paragraph 42 does not completely or accurately state the contents of the document cited therein, and Plaintiffs therefore deny the same.
43. Paragraph 43 does not completely or accurately state the contents of the document cited therein, and Plaintiffs therefore deny the same.
44. Plaintiffs deny the allegations contained in Paragraph 44.
45. Plaintiffs deny the allegations contained in Paragraph 45.
46. Plaintiffs deny the allegations contained in Paragraph 46.
47. Plaintiffs deny the allegations contained in Paragraph 47.
48. Plaintiffs deny the allegations contained in Paragraph 48.
49. Plaintiffs deny the allegations contained in Paragraph 49.

50. Plaintiffs deny the allegations contained in Paragraph 50.

51. Plaintiffs deny the allegations contained in Paragraph 51.

52. Plaintiffs deny the allegations contained in Paragraph 52.

53. Plaintiffs deny the allegations contained in Paragraph 53.

54. Plaintiffs deny the allegations contained in Paragraph 54.

Plaintiffs respectfully request that the Court enter judgment in their favor, and against Defendants.

Respectfully submitted,

PRENDA LAW, INC. and PAUL DUFFY

By: /s/ Paul. Duffy
One of their attorneys

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Dated: September 11, 2014

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 12, 2015, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system, in compliance with Local Rule 5.2(a).

/s/ Paul Duffy
Paul Duffy