

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DONEIKA JOHNSON, on behalf of herself)
and others similarly situated.)
)
Plaintiffs,) **Civil Action 19 CV 2487 GJH**
)
v.)
)
BLACKOUT INVESTIGATIONS &)
SECURITY SERVICES, INC.)

ANSWER TO COMPLAINT

Defendant, Blackout Investigation & Security Services, Inc., by and through its attorneys Tony Graham, Sr., Michael L. Smith and the law office of Smith, Graham & Crump and hereby files its answer to the allegations as follows:

1. This paragraph does not require a response there to. To the extend an answer is required, Defendant admits this allegation.
2. Defendant admits this allegation.
3. Defendant admits this allegation.
4. Defendant does not have sufficient information to admit or deny this allegation.
5. Defendant admits this allegation.
6. Defendant admits this allegation.
7. Defendant admits this allegation.
8. Defendant admits this allegation.
9. Defendant admits this allegation.
10. Defendant admits this allegation.
11. Defendant denies this allegation.
12. Defendant denies this allegation.

13. Defendant admits the allegation in this paragraph.
14. Defendant denies the allegations in this paragraph.
15. Defendant denies the allegations in this paragraph.
16. Defendant denies the allegations in this paragraph.
17. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
18. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
19. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
20. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
21. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
22. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
23. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
24. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.
25. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.

26. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.

27. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.

28. Defendant admits this allegation.

29. Defendant admits this allegation.

30. Defendant denies this allegation.

31. Defendant denies this allegation.

32. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.

33. Defendant admits this allegation.

34. Defendant admits that employees are covered employees to the MWHL'S protection.

35. Defendant admits this allegation.

36. Defendant denies this allegation.

37. Defendant denies this allegation.

38. This allegation requires no response, but to the extent one is required, the Defendant denies this allegation.

39. Defendant does not have sufficient information to admit or deny this allegation but demands strict proof thereof.

40. Defendant denies this allegation.

41. Defendant denies this allegation.

42. Defendant denies this allegation.

43. Defendant denies this allegation.

AFFIRMATIVE DEFENSES

I

This action fails to state a claim for which relief can be granted.

II

This Claim is barred by the Statute of limitations

III

Lack of Jurisdiction over the subject matter

IV

Lack of Jurisdiction over the person

VI

Insufficiency of service of process

VII

Insufficiency of Process

JURY DEMAND

Defendant demands a trial by jury on each and every issue raised.

Respectfully submitted,

/s/ Tony Graham, Sr. _____
Tony Graham, Sr. #14946
Michael L. Smith #
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Answer to Complaint to be mailed and e-filed on this 27th day of December, 2019 to:

/s/ Tony Graham, Sr. _____
Tony Graham, Sr.