

5. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 5 and therefore denies it.

6. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 6 and therefore denies it.

7. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 7 and therefore denies it.

8. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 8 and therefore denies it.

9. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 9 and therefore denies it.

10. Goldenberg admits the allegations of paragraph 10.

11. Goldenberg admits the allegations of paragraph 11.

12. Goldenberg admits the allegations of paragraph 12.

13. Goldenberg admits the allegations of paragraph 13.

14. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 14 and therefore denies it.

15. Goldenberg admits the allegations of paragraph 15.

16. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 16 and therefore denies it.

17. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 17 and therefore denies it.

18. Goldenberg admits the allegations of paragraph 18.

19. Goldenberg admits the allegations of paragraph 19.

20. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 20 and therefore denies it.

21. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 21 and therefore denies it.

22. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 22 and therefore denies it.

23. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 23 and therefore denies it.

24. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 24 and therefore denies it.

25. Goldenberg admits that Surety Marketing Source, LLC was known as Unlimited Bond Source but denies the remaining averments of the first and second sentence of paragraph 25. Goldenberg denies the last sentence of paragraph 25.

26. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 26 and therefore denies it.

27. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 27 and therefore denies it.

28. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of the first part of the first sentence of paragraph 28 and therefore denies it. Goldenberg admits the remaining averments of paragraph 28 in the second half of the first sentence and in the second sentence.

29. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 29 and therefore denies it.

30. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 30 and therefore denies it.

31. Paragraph 31 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 30, they are again denied.

32. Goldenberg denies the averments of paragraph 32.

33. Paragraph 33 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 32, they are again denied.

34. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 34 and therefore denies it.

35. Goldenberg denies the averments of paragraph 35.

36. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 36 and therefore denies it.

37. Goldenberg denies the averments of paragraph 37.

38. Paragraph 38 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 37, they are again denied.

39. Goldenberg denies the averments of paragraph 39.

40. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 40 and therefore denies it.

41. Paragraph 41 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 40, they are again denied..

42. Goldenberg denies the averments of paragraph 42.

43. Paragraph 43 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 42, they are again denied.

44. Goldenberg denies the averments of paragraph 44.

45. Paragraph 45 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 44, they are again denied.

46. Goldenberg denies the averments of paragraph 46.

47. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 47 and therefore denies it.

48. Paragraph 48 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 47, they are again denied.

49. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 49 and therefore denies it.

50. Paragraph 50 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 49, they are again denied.

51. Goldenberg is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 51 and therefore denies it.

52. Paragraph 52 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 51, they are again denied.

53. Goldenberg denies the averments of paragraph 53.

54. Goldenberg denies the averments of paragraph 54.

55. Paragraph 55 does not require additional response, but to the extent that Goldenberg has denied the averments in paragraphs 1 through 54, they are again denied.

56. Goldenberg denies the averments of paragraph 56.

II. DEFENSES

1. Goldenberg asserts that Plaintiff is barred from recovery due to estoppel.

WHEREFORE, PREMISES CONSIDERED, David A. Goldenberg prays that the Court render a take-nothing judgment against Plaintiff, that the Court assess costs against Plaintiff and award Goldenberg all other relief to which he is justly entitled.

Respectfully submitted,

/s/ Kimberly Sims

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ATTORNEYS FOR DAVID A. GOLDENBERG

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument was served upon the following on this 30th day of April, 2007.

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/s/ Kimberly Sims

KIMBERLY M.J. SIMS