

SHAYONNA FEATHERSTONE, et al	*	IN THE
Plaintiffs	*	CIRCUIT COURT
VS.	*	FOR
KENNEDY KRIEGER INSTITUTE, INC et al	*	BALTIMORE CITY
Defendants	*	CASE NO.: 24-C-07-002027
* * * * *		

ANSWER TO COMPLAINT

Now comes the Defendants, Pythagoras Passas and Anne L. Passas, by and through their attorney, Timothy P. Knepp, and respectfully answers Complaint as follows:

GENERAL DENIAL

THE DEFENDANTS DID NOT COMMIT THE WRONG ALLEGED.

THE DEFENDANTS ARE NOT INDEBTED AS ALLEGED.

1. The Defendants deny the allegations contained in paragraph one.
2. The Defendants deny the allegations contained in paragraph two.
3. The Defendants deny the allegations contained in paragraph three.
4. The Defendants deny the allegations contained in all parts of paragraph four.
5. The Defendants deny the allegations contained in paragraph five.
6. The Defendants deny the allegations contained in paragraph six.
7. The Defendants deny the allegations contained in paragraph seven.
8. The Defendants deny the allegations contained in paragraph eight.
9. The Defendants deny the allegations contained in paragraph nine.

10. The Defendants deny the allegations contained in paragraph ten.
11. The Defendants deny the allegations contained in paragraph eleven.
12. The Defendants deny the allegations contained in paragraph twelve.
13. The Defendants deny the allegations contained in paragraph thirteen.
14. The Defendants deny the allegations contained in paragraph fourteen.
15. The Defendants deny the allegations contained in paragraph fifteen.
16. The Defendants deny the allegations contained in paragraph sixteen.
17. The Defendants deny the allegations contained in paragraph seventeen.
18. The Defendants deny the allegations contained in paragraph eighteen.
19. The Defendants deny the allegations contained in paragraph nineteen.
20. The Defendants deny the allegations contained in paragraph twenty.
21. The Defendants deny the allegations contained in paragraph twenty-one.
22. The Defendants deny the allegations contained in paragraph twenty-two.
23. The Defendants deny the allegations contained in paragraph twenty-three.
24. The Defendants deny the allegations contained in paragraph twenty-four.
25. The Defendants deny the allegations contained in paragraph twenty-five.
26. The Defendants deny the allegations contained in paragraph twenty-six.
27. The Defendants deny the allegations contained in paragraph twenty-seven.
28. The Defendants deny the allegations contained in paragraph twenty-eight.
29. The Defendants deny the allegations contained in paragraph twenty-nine.
30. The Defendants deny the allegations contained in paragraph thirty.
31. The Defendants deny the allegations contained in paragraph thirty-one.
32. The Defendants deny the allegations contained in paragraph thirty-two.

33. The Defendants deny the allegations contained in paragraph thirty-three.

34. The Defendants deny the allegations contained in paragraph thirty-four.

35. The Defendants deny the allegations contained in paragraph thirty-five.

COUNT ONE

36. Paragraph thirty-six does not require an affirmative response.

37. The Defendants deny the allegations contained in paragraph thirty-seven.

38. The Defendants deny the allegations contained in paragraph thirty-eight.

39. The Defendants deny the allegations contained in paragraph thirty-nine.

40. The Defendants deny the allegations contained in all parts of paragraph forty.

41. The Defendants deny the allegations contained in paragraph forty-one.

COUNT TWO

42. Paragraph forty-two does not require an affirmative response.

43. The Defendants deny the allegations contained in paragraph forty-three.

44. The Defendants deny the allegations contained in paragraph forty-four.

45. The Defendants deny the allegations contained in paragraph forty-five.

COUNT THREE

46. Paragraph forty-six does not require an affirmative response.

47. The Defendants deny the allegations contained in paragraph forty-seven.

48. The Defendants deny the allegations contained in paragraph forty-eight.

49. The Defendants deny the allegations contained in paragraph forty-nine.

COUNT FOUR

50. Paragraph fifty does not require an affirmative response.

51. The Defendants deny the allegations contained in paragraph fifty-one.

52. The Defendants deny the allegations contained in paragraph fifty-two.

53. The Defendants deny the allegations contained in paragraph fifty-three.

54. The Defendants deny the allegations contained in paragraph fifty-four.

55. The Defendants deny the allegations contained in paragraph fifty-five.

56. The Defendants deny the allegations contained in paragraph fifty-six.

57. The Defendants deny the allegations contained in paragraph fifty-seven.

58. The Defendants deny the allegations contained in paragraph fifty-eight.

59. The Defendants deny the allegations contained in paragraph fifty-nine.

COUNT FIVE

60. Paragraph sixty does not require an affirmative response.

61. The Defendants deny the allegations contained in paragraph sixty-one.

62. The Defendants deny the allegations contained in paragraph sixty-two.

63. The Defendants deny the allegations contained in paragraph sixty-three.

64. The Defendants deny the allegations contained in paragraph sixty-four.

65. The Defendants deny the allegations contained in paragraph sixty-five.

COUNT SIX

66. Paragraph sixty-six does not require an affirmative response.

67. The Defendants deny the allegations contained in paragraph sixty-seven.

68. The Defendants deny the allegations contained in paragraph sixty-eight.

69. The Defendants deny the allegations contained in paragraph sixty-nine.

70. The Defendants deny the allegations contained in paragraph seventy.

71. The Defendants deny the allegations contained in paragraph seventy-one.

72. The Defendants deny the allegations contained in paragraph seventy-two.

73. The Defendants deny the allegations contained in paragraph seventy-three.

74. The Defendants deny the allegations contained in paragraph seventy-four.

75. The Defendants deny the allegations contained in paragraph seventy-five.

COUNT SEVEN

76. Paragraph seventy-six does not require an affirmative response.

77. The Defendants deny the allegations contained in paragraph seventy-seven.

78. The Defendants deny the allegations contained in paragraph seventy-eight.

79. The Defendants deny the allegations contained in paragraph seventy-nine.

80. The Defendants deny the allegations contained in paragraph eighty.

81. The Defendants deny the allegations contained in paragraph eighty-one.

82. The Defendants deny the allegations contained in paragraph eighty-two.

COUNT EIGHT

83. Paragraph eighty-three does not require an affirmative response.

84. The Defendants deny the allegations contained in paragraph eighty-four.

85. The Defendants deny the allegations contained in paragraph eighty-five.

86. The Defendants deny the allegations contained in paragraph eighty-six.

87. The Defendants deny the allegations contained in paragraph eighty-seven.

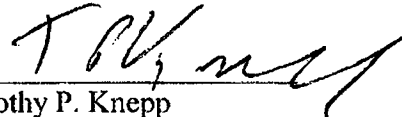
88. The Defendants deny the allegations contained in paragraph eighty-eight.

89. The Defendants deny the allegations contained in paragraph eighty-nine.

AFFIRMATIVE DEFENSES

1. The Defendants assert the defense of assumption of risk.
2. The Defendants assert the defense of contributory negligence.
3. The Defendants assert the defense of statute of limitations.

4. The Defendants assert the defense of laches.



Timothy P. Knepp
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(410) 686- 5151

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of April,

2007, a copy of the foregoing **Answer To Complaint** was mailed, first-class, postage prepaid to the following:

Nicholas A. Szokoly
Law Offices of Evan K. Thalenberg, P.A.
216 East Lexington Street
Baltimore, Maryland 21202

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Seven Saint Paul Street
Baltimore, Maryland 21202

Kennedy Krieger Institute, Inc.
707 North Broadway
Baltimore, Maryland 21205

Ms. Cecilia Davoli
707 North Broadway
Baltimore, Maryland 21205

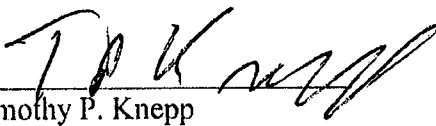
N. A. C. I. Corporation
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416 East 25th Street
Baltimore, Maryland 21218

Shenan Management, Inc.
(A Maryland Corporation)
1900 Lexington Street
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7955 Starburst Drive
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