

Johnathan Miller
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Defendant, Self-Represented

**SUPERIOR COURT OF CALIFORNIA COUNTY OF
RIVERSIDE**

Evergreen Recovery Solutions, LLC, Plaintiff, vs. Johnathan Miller, Defendant(s)	ANSWER Civil No.: RIC-2025-118392 Judge:
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Defendant answers Plaintiff's Complaint as follows:

RESPONSE TO ALLEGATIONS

1. Defendant admits the allegation in paragraph 1.
2. Defendant denies the allegation in paragraph 2 for lack of knowledge sufficient to know the truth or falsity thereof.
3. Defendant denies the allegation in paragraph 3.
4. Defendant denies the allegation in paragraph 4.
5. Defendant denies the allegation in paragraph 5.
6. Defendant denies the allegation in paragraph 6.

7. Defendant denies the allegation in paragraph 7.
8. Defendant denies the allegation in paragraph 8.
9. Defendant denies the allegation in paragraph 9.
10. Defendant denies the allegation in paragraph 10.

Defendant denies each and every allegation in the Complaint that is not expressly admitted herein.

With respect to all paragraphs in which Plaintiff prays for damages or other relief, Defendant denies that Plaintiff is entitled to such relief under law.

AFFIRMATIVE DEFENSES

1. Plaintiff's claims are barred in whole or in part by the doctrines of laches, equitable estoppel, and unclean hands.
2. Plaintiff's claims are barred in whole or in part because of a failure to mitigate damages.
3. Plaintiff's claims are barred in whole or in part by the statute of limitations.
4. Plaintiff's claims are barred in whole or in part because Defendant paid all or part of the debt.
5. Plaintiff's claims are barred in whole or in part because Plaintiff does not correctly state the amount owed.
6. Plaintiff's claims are barred in whole or in part because Plaintiff breached its contract with Defendant.
7. Defendant requests that Plaintiff perform an accounting and provide Defendant with documentation that proves the amount that Defendant allegedly owes.

WHEREFORE, Defendant requests the following relief:

1. That Plaintiff's Complaint be dismissed with prejudice, and Plaintiff take nothing therefrom;
2. The Defendant recover its reasonable fees and costs incurred in defending against this lawsuit;
3. For such other and further relief as this Court may deem just and proper.

DATED: 09/26/2021

/s/ *Johnathan Miller*

Johnathan Miller

Self-represented

Original of the foregoing was caused to be filed via mail on

09/26/2021 to: The Court

Copy caused to be sent via mail on this day to:

Jane Doe

1450 Summit Ridge Plaza, Suite 210

Riverside, CA 92507

/s/ *Johnathan Miller*

Johnathan Miller

Self-represented