

United States District Court
For The Western District of Michigan

Patrick Collins, INC.,)	Civil Action Case No.: <u>1:12-cv-00618</u>
Plaintiff)	
)	
V.)	
)	
Jamie Campbell Baker)	
Defendant)	

Defendant Jamie Campbell-Baker's Answer and Reliance on Jury Demand

COMES NOW the Defendant Jamie Campbell-Baker in answering the allegations of the Complaint on file herein, affirms, denies and alleges as follows:

Introduction

1. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
2. Deny for reason that some is untrue.
3. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Jurisdiction and Venue

4. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
5. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
6. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Parties

7. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
8. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
9. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Factual Background

1. Defendant Used BitTorrent To Infringe Plaintiff's Copyrights

10. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
11. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
12. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
13. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
14. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
15. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
16. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
17. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

United States District Court
For the Western District of Michigan

Civil Action Case No. 12-1-cv-00618

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Patent Claims, LLC,

Plaintiff,

v.

Jamie Campbell Baker,

Defendant.

Defendant Jamie Campbell-Baker's Answer and Release on Jury Demand

PLEASE READ the defendant Jamie Campbell-Baker in answering the allegations of the Complaint on the
factual, affirm, denies and alleges as follows:

Introduction

- 1. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 2. Deny for reason that some is untrue.
- 3. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Jurisdiction and Venue

- 4. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 5. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 6. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Allegations

- 7. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 8. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 9. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Factual Background

- 10. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 11. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 12. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 13. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 14. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 15. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 16. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 17. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

18. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
19. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
20. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
21. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
22. Deny for reason that some is untrue.
23. Deny for reason that some is untrue.

Miscellaneous

24. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
25. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Count I

Direct Infringement Against Defendant

26. Deny for reason that some is untrue.
27. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
28. Deny for reason that some is untrue.
29. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
30.
 - A. Deny for reason that some is untrue.
 - B. Deny for reason that some is untrue.
 - C. Deny for reason that some is untrue.
 - D. Deny for reason that some is untrue.
31. Deny for Reason that some is untrue.
32. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Defense 1 – Failure to State a Claim

Defendant answering the Complaint herein, alleges that all allegations and counts brought forth therein fails to state a claim for which relief can be granted.

Defense 2 – Failure to Receive Proper Service of Summons and Complaint

Defendant answering the Complaint herein, alleges that on November 1, 2012, a copy of the complaint was hand delivered to the defendant's address however the Summons did not accompany the Complaint.

Affirmative Defenses

1. Plaintiff is barred by accord and satisfaction.
2. Plaintiff is barred by arbitration and award.
3. Plaintiff is barred by assumption of risk.
4. Plaintiff is barred by contributory negligence.
5. Plaintiff is barred by duress.
6. Plaintiff is barred by estoppel.
7. Plaintiff is barred by failure of consideration.
8. Plaintiff is barred by fraud.

- 28. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 29. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 30. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 31. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 32. Deny for reason that some is untrue.
- 33. Deny for reason that some is untrue.

Miscellaneous

- 34. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 35. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Count 1

Direct Infringement Against Defendant

- 36. Deny for reason that some is untrue.
- 37. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 38. Deny for reason that some is untrue.
- 39. Defendant is without sufficient knowledge or information to form an answer and therefore denies.
- 40.
 - A. Deny for reason that some is untrue.
 - B. Deny for reason that some is untrue.
 - C. Deny for reason that some is untrue.
 - D. Deny for reason that some is untrue.
- 41. Deny for Reason that some is untrue.
- 42. Defendant is without sufficient knowledge or information to form an answer and therefore denies.

Defense 1 – Failure to State a Claim

Defendant answering the Complaint herein alleges that all allegations and counts brought forth therein fails to state a claim for which relief can be granted.

Defense 2 – Failure to Receive Proper Service of Summons and Complaint

Defendant answering the Complaint herein alleges that on November 1, 2012, a copy of the complaint was hand delivered to the defendant's address however the summons did not accompany the complaint.

Affirmative Defenses

- 1. Plaintiff is barred by accord and satisfaction.
- 2. Plaintiff is barred by adjudication and award.
- 3. Plaintiff is barred by assumption of risk.
- 4. Plaintiff is barred by contributory negligence.
- 5. Plaintiff is barred by duress.
- 6. Plaintiff is barred by estoppel.
- 7. Plaintiff is barred by failure of consideration.
- 8. Plaintiff is barred by fraud.

9. Plaintiff is barred by illegality.
10. Plaintiff is barred by injury by fellow servant.
11. Plaintiff is barred by laches.
12. Plaintiff is barred by license.
13. Plaintiff is barred by payment.
14. Plaintiff is barred by release.
15. Plaintiff is barred by res judicata.
16. Plaintiff is barred by statute of frauds.
17. Plaintiff is barred by statute of limitations.
18. Plaintiff is barred by waiver.

WHEREFORE, Defendant prays that the Plaintiff take nothing and the Defendant have judgment against the Plaintiff and recover the costs of suit herein, and such other relief the court may deem proper.

Defendant hereby relies on Plaintiff's Jury Demand.

Dated this 19th day of November, 2012



Jamie Campbell-Baker
4039 S Rose Street Apt 102
Kalamazoo, MI 49001

I, Jamie Campbell-Baker, swear and affirm that I served a copy of Defendant's Answer and Reliance on Jury Demand upon Paul J Nicoletti by first class mail with postage prepaid by sender on this date.

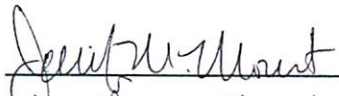


Jamie Campbell-Baker
Defendant Pro Se

Notarization

STATE OF MICHIGAN)
)
COUNTY OF KALAMAZOO)

The foregoing instrument was acknowledged before me this 19th Day of November 2012 by Jamie Campbell-Baker.



Jennifer M. Mount, Notary Public
Kalamazoo County, Michigan
My commission expires: 04/27/2015