

V I R G I N I A :

IN THE CIRCUIT COURT OF ARLINGTON COUNTY
Civil Division

U.S. NEWS & WORLD REPORT, INC.,)
)
) Plaintiff,)
)
v.) In Chancery No. 96-203
)
RAM AVRAHAMI,)
)
) Defendant.)

U.S. NEWS' ANSWER TO BILL OF COMPLAINT

Defendant U.S. News & World Report, Inc. ("U.S. News") for its answer to the Bill of Complaint filed by plaintiff Ram Avrahami ("Avrahami") states as follows:

FIRST DEFENSE

With respect to the specific paragraphs of the Bill of Complaint, U.S. News states as follows:

1. Admitted.
2. The first sentence of paragraph 2 is admitted. The second sentence of paragraph 2 is a legal conclusion by plaintiff to which no response is required.
3. Admitted.
4. U.S. News denies that the defendant Avrahami accepted U.S. News' offer to subscribe, but affirmatively avers that someone named Ram Avrahani accepted the solicitation sent to Ram Avrahami. The remaining allegations of paragraph 4 are denied.
5. Denied.

6. Denied.
7. Denied.
8. Denied.
9. Denied.

SECOND DEFENSE

The Bill of Complaint fails to state a claim upon which relief may be granted.

THIRD DEFENSE

The claims in the Bill of Complaint are barred by the doctrine of estoppel.

FOURTH DEFENSE

The claims in the Bill of Complaint are barred by the doctrine of unclean hands.

FIFTH DEFENSE

The plaintiff has waived the claims contained in the Bill of Complaint.

WHEREFORE, U.S. News prays that judgment be entered in favor of U.S. News & World Report, Inc. and that Avrahami's Bill of Complaint be dismissed with prejudice.

Dated: April 26, 1996

Respectfully submitted,

U.S. NEWS & WORLD REPORT, INC.
By Counsel

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By: /S/
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