

2. Plaintiffs' claims and/or alleged damages/relief are barred or reduced in whole or in part by quasi-estoppel and/or estoppel by conduct.

3. Plaintiffs' claims and/or alleged damages/relief are barred or reduced in whole or in part by judicial-proceedings immunity.

4. Plaintiffs' claims and/or alleged damages/relief are barred or reduced in whole or in part by the litigation privilege.

5. Plaintiffs' claims and/or alleged damages/relief are barred or reduced in whole or in part because Plaintiffs' alleged damages are not compensable injuries.

6. Plaintiffs' claims and/or alleged damages/relief are barred or reduced in whole or in part because the alleged wrongful conduct by Defendants was privileged or justified.

7. Defendants reserve the right to supplement or amend their answer.

III. CONCLUSION

For the foregoing reasons, Defendants respectfully request the Court enter judgment that Plaintiffs take nothing by reason of Plaintiffs' lawsuit, that Defendants be awarded their costs of suits, including costs of Court and reasonable legal expenses and attorneys' fees, and for any and other further relief, both at law and in equity, to which Defendants may be justly entitled.

DATED: November 14, 2019

Respectfully submitted,

/s/ Daniel C. Polese

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CERTIFICATE OF SERVICE

The undersigned certifies on November 14, 2019, a true and correct copy of the foregoing document was served on all counsel of record via electronic filing.

/s/ Daniel C. Polese

Daniel C. Polese