

IN THE CIRCUIT COURT OF CLAY COUNTY, ARKANSAS  
WESTERN DISTRICT  
CIVIL DIVISION

NINA ALLYN

V.

BARBARA WOOLARD AND  
THE UNITED STATES DEPARTMENT OF AGRICULTURE

CASE NO. CIV-2016-3

FILED FOR RECORD  
PLAINTIFF 2016 FEB 11 A 9:53

JANET LUFFKILBREATH, CLERK

BY AS  
DEFENDANTS

ANSWER

The defendant, Barbara Woolard, by and through her attorney, Mike Trail, and for her Answer, states as follows:

1. The defendant admits that both plaintiff and defendant are residents of the Western District of Clay County, Arkansas. The defendant denies that the United States Department of Agriculture pays her any money or that the Court has jurisdiction over the United States Department of Agriculture.

2. The defendant denies the allegations contained in paragraph two of plaintiff's complaint.

3. The defendant denies the allegations contained in paragraph three of the plaintiff's complaint.

4. The defendant denies that Exhibit "A", mentioned in paragraph four of plaintiff's complaint, is a valid deed and denies that the plaintiff is an owner of the property described therein.

5. The defendant admits that Exhibit "B", mentioned in paragraph five of plaintiff's complaint is a valid deed.

6. The defendant denies the allegations contained in paragraph six of

Exhibit B

plaintiff's complaint.

7. The defendant denies the allegations contained in paragraph seven of plaintiff's complaint.

8. The defendant denies the allegations contained in paragraph eight of plaintiff's complaint.

9. The defendant denies the allegations contained in paragraph nine of plaintiff's complaint.

10. The defendant asserts the affirmative defenses of fraud and set off

11. The defendant denies all allegations contained in the plaintiff's complaint not specifically admitted to herein.

12. The defendant asserts that not all necessary parties are included in this lawsuit herein.

13. The defendant prays for an award of attorney's fees for the defense of this frivolous matter.

WHEREFORE, the defendant, Barbara Woolard, prays that the complaint of the plaintiff be dismissed and held for naught, for an award of attorney's fees and for all other relief to which she is entitled.

Respectfully Submitted,

Mike Trail  
Attorney at Law  
114 W. 4<sup>th</sup> St.  
P.O. Box 45  
Rector, AR 72461  
(870) 595-1020

BY: Mike Trail  
Mike Trail, Attorney for the Defendant  
AR Bar No. 97212

Certificate of Service

The undersigned, states under oath the above-titled pleading has been served on opposing counsel or the opposing party by mailing it, U.S. mail, postage prepaid, to the attorney for the plaintiff, John Ogles, P.O. Box 891, Jacksonville, AR 72078, on the 11<sup>th</sup> day of February, 2016.

Mike Trail  
Mike Trail