

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 99-2082-CIV-MOORE

MANSANTO COMPANY and
THE NUTRASWEET COMPANY,

MAGISTRATE JUDGE SULLIVAN

Plaintiffs,

vs.

FAUSTO J. CAMPUZANO, etc.,
et al.,

Defendants.

CLERK OF DISTRICT
CLERK OF DISTRICT
S.D. OF FLA.-MIAMI

99 SEP -7 PM 12:15

FILED IN _____ D.C.

**DEFENDANTS, FAUSTO J. CAMPUZANO, MARIA CAMPUZANO
AND F. GARCIA WHOLESALE & EXPORT, INC. ANSWER TO COMPLAINT**

Defendants, FAUSTO J. CAMPUZANO, MARIA CAMPUZANO and F. GARCIA
WHOLESALE & EXPORT, INC. answer the Plaintiffs' Complaint as follows:

1. Defendants admit that this action purports to be an action for seeking a permanent injunction but denies the validity of said action.
2. Without knowledge, therefore denied.
3. Without knowledge, therefore denied.
4. Without knowledge, therefore denied.
5. Admitted.
6. Defendants admit that F. GARCIA WHOLESALE & EXPORT, INC. is a Florida corporation with its principal place of business located at 300 Sevilla Avenue, Coral Gables, Florida 33134. All other allegations set forth in this paragraph are denied.
7. Denied.
8. Denied.
9. Without knowledge, therefore denied.
10. Without knowledge, therefore denied.
11. Without knowledge, therefore denied.

12. Without knowledge, therefore denied.
13. Without knowledge, therefore denied.
14. Without knowledge, therefore denied.
15. Without knowledge, therefore denied.
16. Without knowledge, therefore denied.
17. Without knowledge, therefore denied.
18. Without knowledge, therefore denied.
19. Without knowledge, therefore denied.
20. Without knowledge, therefore denied.
21. Without knowledge, therefore denied.
22. Without knowledge, therefore denied.
23. Without knowledge, therefore denied.

24. Admitted.

25. Admitted as to these Defendants, but without knowledge as to the remaining

Defendants.

26. Admitted
27. Without knowledge, therefore denied.
28. Without knowledge, therefore denied.
29. Without knowledge, therefore denied.
30. Without knowledge, therefore denied.
31. Without knowledge, therefore denied.
32. Without knowledge, therefore denied.
33. Without knowledge, therefore denied.
34. Without knowledge, therefore denied.

- 35. Without knowledge, therefore denied.
- 36. Without knowledge, therefore denied.
- 37. Without knowledge, therefore denied.
- 38. Without knowledge, therefore denied.
- 39. Without knowledge, therefore denied.
- 40. Without knowledge, therefore denied.
- 41. Without knowledge, therefore denied.
- 42. Without knowledge, therefore denied.
- 43. Without knowledge, therefore denied.
- 44. Without knowledge, therefore denied.
- 45. Without knowledge, therefore denied.
- 46. Without knowledge, therefore denied.
- 47. Without knowledge, therefore denied.
- 48. Without knowledge, therefore denied.
- 49. Defendants admit that GARCIA sold some institutional cartons of Equal to Defendant

TRIO which were shipped to Sari. All other allegations set forth in this paragraph are denied.

- 50. Without knowledge, therefore denied.
- 51. Without knowledge, therefore denied.
- 52. Without knowledge, therefore denied.
- 53. Without knowledge, therefore denied.
- 54. Without knowledge, therefore denied.
- 55. Without knowledge, therefore denied.
- 56. Without knowledge, therefore denied.
- 57. Without knowledge, therefore denied.

- 58. Without knowledge, therefore denied.
- 59. Without knowledge, therefore denied.
- 60. Without knowledge, therefore denied.
- 61. Denied.
- 62. Denied.
- 63. Denied.
- 64. Denied.
- 65. Denied.
- 66.(including sub-parts) Denied.

FIRST COUNT

- 67. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.
- 68. Denied.
- 69. Denied.

SECOND COUNT

- 70. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.
- 71. Denied.
- 72. Denied.

THIRD COUNT

- 73. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.
- 74. Denied.
- 75. Denied.

FOURTH COUNT

76. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.

77. Denied.

78. Denied.

FIFTH COUNT

79. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.

80. Denied.

81. Denied.

SIXTH COUNT

82. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.

83. Denied.

84. Denied.

85. Denied.

SEVENTH COUNT

86. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.

87. Denied.

88. Denied.

EIGHTH COUNT

89. Defendants repeat and reallege their answers to paragraphs 1 through 66 as if fully set forth herein.

90. Denied.

91. Denied.

All other allegations not specifically admitted herein are denied.

WHEREFORE, having filed their Answer, Defendants request that this Court enter judgment in their favor and award them costs and attorneys' fees pursuant to Rule 11, 15 U.S.C. §1117, 17 U.S.C. §505, Fla. Stat. 501.2105.

DEMAND FOR JURY TRIAL

Defendants demand trial by jury on all claims.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand-delivery to Alan Rosenthal, Esq., Keith Mack LLP, Twentieth Floor, 200 South Biscayne Boulevard, Miami, FL and mailed to Rodney A. Brown, Esq., Brown & Fox, P.C., 110 East 59th Street, New York, New York 10022, on this 26 day of August, 1999.

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BY: _____

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