

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

SHANA SANDLER,

Plaintiff

vs.

**MIA CALCAGNI, RALPH CALCAGNI,
MAUREEN CALCAGNI, PETER
MARS, and BOOKSURGE, LLC,**

Defendants

Case No. 1:07-cv-00029

**ANSWER OF PETER MARS TO CROSS-CLAIM OF
CALCAGNI DEFENDANTS**

1. Defendant Mars admits the allegations of paragraph 1.
2. Defendant Mars admits the allegations of paragraph 2.
3. Defendant Mars admits the allegations of paragraph 3.
4. Defendant Mars admits the allegations of paragraph 4.
5. The allegations of paragraph 5 relate to prior pleadings of the Calcagni defendants. Denied by defendant Mars to the extent necessary.
6. Defendant Mars denies the allegations of paragraph 6.
7. Defendant Mars denies the allegations of paragraph 7.

Wherefore, defendant Peter Mars requests that the cross-claim of the Calcagni defendants be dismissed and for such other and further relief as the court deems just and proper.

FIRST AFFIRMATIVE DEFENSE

The cross-claim of the Calcagni defendants fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

The cross-claim of the Calcagni defendants is barred or reduced by the fault or negligence of the Calcagni defendants.

THIRD AFFIRMATIVE DEFENSE

The Calcagni defendants cross-claims are barred by the doctrines of waiver, estoppel, laches, or unclean hands.

FOURTH AFFIRMATIVE DEFENSE

Defendant Mars incorporates the affirmative defenses set forth in his answer to the amended complaint filed against him by plaintiff Shanda Sandler as if fully set forth at this point.

Dated at Waterville, Maine, this 14th day of November 2007.

/s/ J. William Druary, Jr.

J. William Druary, Jr., Esquire
Attorney for Defendant Peter Mars

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