

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
Baltimore Division

ALBERT SNYDER, :  
 :  
Plaintiff : Civ. No. 1:06-cv-01389-RDB  
 :  
FRED PHELPS, et al, :  
 :  
Defendant. :

**ANSWER TO AMENDED COMPLAINT BY DEFENDANTS FRED W. PHELPS, SR.,  
AND WESTBORO BAPTIST CHURCH, INC.**

Defendants Fred W. Phelps, Sr. ("Phelps") and Westboro Baptist Church, Inc. ("Westboro") (collectively, "Defendants"), through undersigned counsel, hereby answer the Amended Complaint as follows:

1. Defendants reincorporate by reference the First, Second, Third, and Fourth Defenses of Defendants' original Answer to the original Complaint.

2. As to the allegations contained in the Amended Complaint that are not contained in the original Complaint, Defendants state as follows (using the paragraph numbers contained in the Amended Complaint):

a. Paragraphs 8 and 9 refer to the addresses of the new defendants, and, therefore, do not require an answer from Defendants. Nevertheless, Defendants admit that Shirley Phelps-Roper and Rebekah Phelps Davis are adult individuals.

b. Defendants' original Answer responds to Paragraph 10.

c. As to paragraphs 17 and 18, Westboro hosts the websites listed in this paragraph of the Complaint. All remaining allegations are denied.

3. Defendants have answered all numbered paragraphs of the Complaint. To the extent that Defendants have not answered all allegations in the Complaint, the remaining allegations that have not already been answered are hereby denied.

WHEREFORE, having fully answered, Defendants pray that the Amended Complaint be dismissed, and that an order be issued for Plaintiff to pay Defendants for all Defendants' litigation costs and expenses, and attorney's fees.

Respectfully submitted

**MARKS & KATZ, L.L.C.**

    /s/ Jonathan L. Katz      
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**JURY TRIAL DEMAND**

Defendants respectfully demand a jury.

    /s/ Jonathan L. Katz      
Jonathan L. Katz

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Answer to Amended Complaint was served by the CM/ECF filing system on March 19, 2007, to:

Paul W. Minnich, Esquire  
Rees Griffiths, Esquire  
Craig T. Trebilcock, Esquire  
Sean E. Summers, Esquire

\_\_\_\_\_/s/ Jonathan L. Katz\_\_\_\_\_  
Jonathan L. Katz