# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA CIVIL ACTION NUMBER 1:07-CV-00953

RYAN McFADYEN, et al.,	)	
Plaintiffs,	)	
<b>v.</b>	)	ANSWER OF DEFENDANT
	)	LINWOOD WILSON TO
DUKE UNIVERSITY, et al.,	)	SECOND AMENDED
Defendants.	)	COMPLAINT
	)	

Linwood Wilson responds as follows to the Second Amended Complaint filed in this action:

## FIRST DEFENSE

Plaintiffs' Second Amended Complaint violates Rule 8 of the Federal Rules of Civil Procedure, which requires a complaint to contain a "short and plain statement of the claim showing that the pleader is entitled to relief." Instead, Plaintiffs' Second Amended Complaint includes a large number of implicit allegations that are undefined and bases its allegations on a large number of false premises. It contains 428 pages and 1,388 numbered paragraphs, "most of which are not relevant to the actual legally-recognized claims that may be available." (See D.E. 186 at 221.)

## SECOND DEFENSE

Defendant Linwood Wilson denies anything that is not explicitly admitted in the same terms in which it is alleged. It is not the intention of Defendant Wilson to make any implicit admissions of facts, premises, or concepts that are logically, or otherwise, implied by the allegations within the Second Amended Complaint. Where facts, premises, or concepts are admitted, Defendant Linwood Wilson will admit those facts, premises or concepts expressly. Defendant Linwood Wilson denies all other allegations within this Second Amended Complaint that are not admitted.

#### **THIRD DEFENSE**

Defendant Linwood Wilson has not engaged in discovery regarding the circumstances of the Plaintiffs' allegations. Defendant Linwood Wilson thus expressly reserves the right to move to amend his answer to add additional responses and defenses as discovery progresses and additional information regarding this action becomes available.

#### FOURTH DEFENSE

To the extent that any of the headings contained within the Second Amended Complaint are construed as allegations, Defendant Linwood Wilson denies the allegations.

#### FIFTH DEFENSE

Defendant Linwood Wilson was at all times a civilian investigator with the State of North Carolina, Administrative Offices of the Court, and worked in the 14<sup>th</sup> Judicial District under District Attorney Michael Nifong. Mr. Wilson assumed the position of the District Attorney Investigator (a civil position described under NC General Statues) in October 2006. Prior to that time

Defendant Wilson was a worthless check coordinator in the District Attorney's office. Defendant Wilson, as a civilian employee, had no power of arrest or judicial authority. Defendant Wilson's primary job was to prepare the cases he was assigned by Defendant Nifong or any other Assistant District Attorney only for the preparation of trial.

### SIXTH DEFENSE

Defendant Linwood Wilson responds as follows to the numbered allegations contained in the Second Amended Complaint: To the extent that the heading that precedes Paragraph 1 is construed as allegations, Defendant Linwood Wilson denies the allegations.

 Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint.
 Defendant Linwood Wilson is not even named in this "consortium" allegation. To the extent that this allegation is found to include Defendant Linwood Wilson then Defendant Linwood Wilson denies the allegations.

2. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is not even named in this "consortium" allegation. To the extent that this allegation is found to include Defendant Linwood Wilson then Defendant Linwood Wilson denies the allegations.

3. Defendant Linwood Wilson is not even named in this allegation. To the extent that this allegation is found to include Defendant Linwood Wilson then Defendant Linwood Wilson denies the allegations.

4. Defendant Linwood Wilson denies the allegations.

5. Upon information and belief, Defendant Linwood Wilson admits that the North Carolina Attorney General's office conducted an independent investigation of the allegations made by Ms. Mangum. Upon information and belief, Defendant Linwood Wilson admit that on April 11, 2007, the North Carolina Attorney General dismissed all charges against David Evans, Colin Finnerty, and Reade Seligmann arising from the rape allegations that are the subject of this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the heading that precedes Paragraph 6 is construed as allegations, Defendant Linwood Wilson denies the allegations.

6. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

7. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

9. Defendant Linwood Wilson admits that upon information and belief, the Plaintiffs were undergraduates at Duke University and members of its men's lacrosse team during the spring semester of 2006. Defendant Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

10. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations.

11. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations.

12. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

13. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

14. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

15. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

16. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

17. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

18. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

19. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

20. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

21. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

22. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

23. Upon information and belief Defendant Linwood Wilson believes that Richard Brodhead serves as President of Duke University, including during the period from March 13, 2006 (the date of Plaintiffs' party) to the present. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations

24. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations

25. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

26. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

27. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations.

28. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

29. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the further allegations.

30. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations

31. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

32. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

33. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

34. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

35. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

36. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

37. The claims against Theresa Arico were dismissed by the Court's Order of March 31, 2011. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

38. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations.

39. Defendant Wilson admits that Duke University, former Chairman Steel, President Brodhead, former Senior Vice President Burness, former Director Drummond, Chancellor Dzau, former Associate Vice President Graves, former Director Dean, Sergeant Smith, DUHS and Nurse Levicy are Defendants in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

40. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

41. Defendant Wilson admits that Former Chairman Steel, President Brodhead, former Senior Vice President Burness, former Director Drummond and Chancellor Dzau are Defendants in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

42. Defendant Wilson admits that Nurse Levicy, DUHS and Duke University are Defendants named in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

43. Defendant Wilson admits that President Brodhead, former Associate Vice President Graves, Sergeant Smith, and former Director Dean are Defendants in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

44. Defendant Wilson admits that President Brodhead, former Associate Vice President Graves, and former Director Dean are Defendants in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

45. Defendant Wilson admits that Sergeant Smith is a Defendant in this
Action. Defendant Linwood Wilson is without knowledge or information
sufficient to form a belief about the truth of the remaining allegations.
46. Defendant Wilson admits that Former Director Drummond is a Defendant in
this Action. Defendant Linwood Wilson is without knowledge or information
sufficient to form a belief about the truth of the remaining allegations.

47. Defendant Linwood Wilson admits that Former Chairman Steel, Sergeant Smith, former Director Dean, former Associate Vice President Graves, and President Brodhead are Defendants in this Action. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

To the extent that the heading that precedes Paragraph 48 is construed as allegations, Defendant Linwood Wilson denies the allegations.

48. Defendant Linwood Wilson admits that the City of Durham is a municipal corporation formed under the laws of North Carolina. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

49. Defendant Linwood Wilson admits that Michael Nifong was the District Attorney for Durham County. Upon information and belief, it is further admitted that former District Attorney Nifong was disbarred by the North Carolina State Bar for his actions relating to the prosecution of David Evans, Colin Finnerty, and Reade Seligmann. Other than reports of the disbarment proceedings, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations. To the extent that the heading that precedes Paragraph 50 is construed as

allegations Defendant Wilson denies the allegations.

50. Upon information and belief, Defendant Linwood Wilson admits that Patrick Baker was the City Manager for the City of Durham. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

51. Upon information and belief, Defendant Linwood Wilson admits that Steven Chalmers was the Chief of Police for the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations. 52. Upon information and belief, Defendant Linwood Wilson admits that Ronald Hodge was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

53. Upon information and belief, Defendant Linwood Wilson admits that Lee Russ was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

54. Upon information and belief, Defendant Linwood Wilson admits that Stephen Mihaich was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

55. Upon information and belief, Defendant Linwood Wilson, admits that Beverly Council was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

56. Upon information and belief, Defendant Linwood Wilson admits that Jeff Lamb was employed by the Durham Police Department and is now retired. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

57. Upon information and belief, Defendant Linwood Wilson admits that Michael Ripberger was employed by the Durham Police Department. Defendant

Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

58. Upon information and belief, Defendant Linwood Wilson admits that Laird Evans was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

59. Upon information and belief, Defendant Linwood Wilson admits that James Soukup was employed by the Durham Police Department. Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

To the extent that the heading that precedes Paragraph 60 is construed as allegations, Defendant Linwood Wilson denies the allegations.

60. Upon information and belief, Defendant Linwood Wilson admits that Kammie Michael was employed by the Durham Police Department. Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

61. Upon information and belief, Defendant Linwood Wilson admits that David Addison was employed by the Durham Police Department. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

To the extent that the heading that precedes Paragraph 62 is construed as allegations, Defendant Wilson denies the allegations.

62. Upon information and belief, Defendant Linwood Wilson admits that Mark Gottlieb was employed by the Durham Police Department. Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

63. Upon information and belief, Defendant Linwood Wilson admits that Benjamin Himan was employed by the Durham Police Department. Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

64. Defendant Linwood Wilson admits that he was employed by the District Attorney for the Fourteenth Judicial District as a civilian employee. Defendant Wilson admits that he was fired by Interim District Attorney Jim Hardin, who was appointed by former and now disgraced Governor Michael Easley, on June 25, 2007. Defendant Linwood Wilson denies the remaining allegations.

65. Upon information and belief, Defendant Linwood Wilson admits that Richard Clayton was employed by the Durham Police Department Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations.

66. Defendant Linwood Wilson denies the allegations.

67. Defendant Linwood Wilson denies the allegations.

69. Defendant Linwood Wilson denies being a Durham Investigator and, therefore, denies the allegations.

71. Defendant Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

72. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 73 is construed as allegations, Defendant Linwood Wilson denies the allegations.

73. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

74. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

75. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

77. Defendant Linwood Wilson specifically denies that he, or anyone acting on behalf of him, were a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the heading that precedes Paragraph 78 is construed as allegations Defendant Linwood Wilson denies the allegations.

78. As a result of the matters alleged in the Second Amended Complaint, which are denied, Defendant Linwood Wilson admits that the Plaintiffs purport to allege violations of 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 1988, the North Carolina statutes, and the North Carolina common law. Defendant Linwood Wilson denies that the allegations in the Second Amended Complaint state claims upon which relief can be granted. Defendant Linwood Wilson denies the remaining allegations.

79. As a result of the matters alleged in the Second Amended Complaint, which are denied, Defendant Linwood Wilson admits that these allegations place jurisdiction in this Court. Defendant Linwood Wilson denies that the allegations in the Second Amended Complaint state claims upon which relief can be granted. Defendant Linwood Wilson denies the remaining allegations.

80. As a result of the matters alleged in the Second Amended Complaint, which are denied, Defendant Linwood Wilson admits that these allegations place jurisdiction in this Court. Defendant Linwood Wilson denies that the allegations in the Second Amended Complaint state claims upon which relief can be granted. Defendant Linwood Wilson denies the remaining allegations.

81. As a result of the matters alleged in the Second Amended Complaint, which are denied, Defendant Linwood Wilson admits these allegations place venue in the United States District Court for the Middle District of North Carolina. Defendant Linwood Wilson denies that the allegations in the Second Amended Complaint state claims upon which relief can be granted. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the headings that precede Paragraph 82 are construed as allegations, Defendant Linwood Wilson denies the allegations.

82. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

84. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

85. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

87. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

88. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

89. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

90. Defendant Linwood Wilson admits that a video, referenced as Attachment 1 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

91. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

93. The allegations in Paragraph 93 call for a legal conclusion to which no response is required. To the extent that a response is required, Defendant Linwood Wilson denies the allegations.

94. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

95. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

96. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

97. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

98. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

100. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

101. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

102. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

103. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

104. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

105. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

107. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

108. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

109. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

110. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

111. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

112 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 113 is construed as allegations Defendant Wilson denies the allegations.

113. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

114. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

115. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

116. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

117. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Wilson denies the remaining allegations.

118. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

119. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

120. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

121. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

122. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

123. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to

form a belief about the truth of the allegations and, therefore, denies the allegations.

124. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

125. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson further specifically denies any involvement in conducting "warrantless raids of student homes and unlawful detention and interrogation" of any students at Duke University. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations as he was not employed by the State of NC AOC / Durham DA.

126. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

127. Defendant Linwood Wilson specifically denies that he participated in or condoned in any way any sort of "war" on Duke students. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as

alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

128. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson further specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the heading that precedes Paragraph 129 is construed as allegations, Defendant Linwood Wilson denies the allegations.

129. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

130. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

131. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

133. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

134. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

135. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson was not even employed by the District Attorney's Office during the times set out in this paragraph. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

136. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the headings that precede Paragraph 138 are construed as allegations, Defendant Linwood Wilson denies the allegations.

138. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson admits that there is a photograph that has been inserted into Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations since he wasn't employed with the State or DA's office at this time and, therefore, denies the remaining allegations.

139. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

140. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

141. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

143. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

144. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the headings that precede Paragraph 145 are construed as allegations, Defendant Linwood Wilson denies the allegations.

145. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State or DA's office at that time and, therefore, denies the allegations.

146. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

147. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State or DA's office at that time and, therefore, denies the allegations.

148. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

149. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

150. Defendant Linwood Wilson admits that a document, referenced as Attachment 5 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

151. Defendant Linwood Wilson admits that a document, referenced as Attachment 6 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

152. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 153 is construed as allegations, the Defendant Linwood Wilson denies the allegations.

153. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

154 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

155. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

156. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 157 is construed as allegations, Defendant Linwood Wilson denies the allegations.

157. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not

employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

158. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

159. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 160 is construed as allegations, Defendant Linwood Wilson denies the allegations.

160. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

161. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

162. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not

employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

163. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

164. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

165. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

166. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

167. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

168. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 169 is construed as allegations, Defendant Linwood Wilson denies the allegations.

169. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

170. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations since he was not employed by the State of NC AOC / DA's office at that time and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 171 are construed as allegations, Defendant Linwood Wilson denies the allegations.

171. Defendant Linwood Wilson denies that it was known by him that Officer Gottlieb was a "rogue officer." Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

172. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 173 is construed as allegations, Defendant Linwood Wilson denies the allegations.

174. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

175. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

176. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 177 is construed as allegations, Defendant Linwood Wilson denies the allegations.

177. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

178. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 180 is construed as allegations, Defendant Linwood Wilson denies the allegations.

180. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

181. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

182. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

183. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

184. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 185 is construed as allegations, Defendant Linwood Wilson denies the allegations.

186. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

187. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

188. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

189. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

190. Defendant Linwood Wilson admit that a document, referenced as Attachment 7 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

192. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

193. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 194 are construed as allegations, Defendant Linwood Wilson denies the allegations.

194. Upon information and belief, Defendant Linwood Wilson admits that evidence has been presented in other legal proceedings arising from this same series of events, including the criminal proceedings and the State Bar's proceedings against Michael Nifong, that on March 13, 2006, members of the Duke University men's 2005-2006 lacrosse team attended a party at a house located in Durham at 610 North Buchanan Boulevard. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

195. Upon information and belief, Defendants Linwood Wilson admits that evidence has been presented in other legal proceedings arising from this same series of events, including the criminal proceedings and the State Bar's

proceedings against Michael Nifong, that some of the members of the 2005-2006 Duke University men's lacrosse team chose to hire dancers for a party at 610 North Buchanan Boulevard. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

196. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 196 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

197. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 196 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

198. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

199. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 199 were provided to the District Attorneys Office through

written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

200. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 200 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

201. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 201 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

202. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 202 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

203. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 203 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

204. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

205. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

206. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 206 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

207. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 207 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or

information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

208. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

209. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 209 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

210. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 210 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

211. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

213. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

214 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. Upon information and belief, Defendant Linwood Wilson admits that on April 11, 2007, the North Carolina Attorney General dismissed all charges against David Evans, Colin Finnerty, and Reade Seligmann arising from the rape allegations that are the subject of this Second Amended Complaint. To the extent that the heading that precedes Paragraph 215 is construed as allegations Defendant Linwood Wilson denies the allegations.

215. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

216. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

218. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, and D and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 219 are construed as allegations, Defendant Linwood Wilson denies the allegations.

219. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 219 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

220. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 220 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

221. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 221 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb that Sgt. Shelton and Officer Stewart arrived at 610 N. Buchanan Blvd. and walked around the house and no one was present. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

222. Defendant Linwood Wilson admits that a video, referenced as Attachment 8 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 223 is construed as allegations, Defendant Linwood Wilson denies the allegations.

223. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

224. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 224 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or

information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 225 is construed as allegations, Defendant Linwood Wilson denies the allegations.

225. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 225 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

226. Defendant Linwood Wilson admits that an audio recording, referenced as Attachment 9 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 226 were provided to the District Attorneys Office through written or audio reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

227 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

229. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 229 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

230. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 230 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

231. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 231 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

232. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 232 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

233. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 233 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

234 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 235 is construed as allegations, Defendant Linwood Wilson denies the allegations.

235. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 235 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or

information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

236. Defendant Linwood Wilson admits that an audio recording, referenced as Attachment 10 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 236 were provided to the District Attorneys Office through written or oral reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

237 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

238. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 239 is construed as allegations, Defendant Linwood Wilson denies the allegations.

239. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

241. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

242. Defendant Linwood Wilson admits that an audio segment, referenced as Attachment 11 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 243 are construed as allegations Defendant Linwood Wilson denies the allegations.

243. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

244. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 245 is construed as allegations, Defendant Linwood Wilson denies the allegations.

246. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 247 is construed as allegations, Defendant Linwood Wilson denies the allegations.

247. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

248. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

249. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

250. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 250 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or

information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

251. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 251 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

252. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 252 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

253. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

254. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 255 is construed as allegations, Defendant Linwood Wilson denies the allegations.

255. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 255 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

256. Defendant Linwood Wilson denies the allegations.

257. Defendant Linwood Wilson specifically denies that he or anyone acting on behalf of him had any involvement in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

258. Defendant Linwood Wilson specifically denies that he or anyone acting on behalf of him had any involvement in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Wilson denies the remaining allegations.

259. Defendant Linwood Wilson specifically denies that he or anyone acting on behalf of him had any involvement in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Wilson denies the allegations.

260. Defendant Linwood Wilson specifically denies that he or anyone acting on behalf of him had any involvement in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

262. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 262 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

263. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 263 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

264. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

265. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

267. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 267 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

268. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

269. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

270. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

271. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 272 is construed as allegations, Defendant Linwood Wilson denies the allegations.

272. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

273. The allegations in Paragraph 273 call for a legal conclusion to which no response is required. To the extent that a response is required, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

274 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

275 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

276 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

277. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 278 are construed as

allegations, Defendant Linwood Wilson denies the allegations.

278. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

279. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

280. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

281. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

282. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

283. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

284. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

286. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

287. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

288. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

289. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

290. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

291. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

293. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

294. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

295. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

296. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

297. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

298. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

300. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

301. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 302 is construed as allegations, Defendant Linwood Wilson denies the allegations.

302. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

303. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

304. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

306. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

307. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

308. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

309. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

310 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

311. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

313. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

314. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 315 is construed as allegations, Defendant Linwood Wilson denies the allegations.

315. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations in subparagraphs A, B, C, and D, and, therefore, denies the allegations.

316. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

317. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

319. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

320. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 321 is construed as allegations, Defendant Linwood Wilson denies the allegations.

321. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, G, H, I, J, K, L, and M, subparts i, ii, and iii of subparagraph I, subparts i, ii, iii, iv, and v of subparagraph K, and subparts i and ii of subparagraph M, and, therefore, denies the allegations.

322. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

324. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

325. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

326. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

327. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

328. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

329. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

331. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

332. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 333 are construed as allegations, Defendant Linwood Wilson denies the allegations.

333. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

334. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

335. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

337. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

338. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

339. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

340. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

341. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 342 is construed as allegations, Defendant Linwood Wilson denies the allegations.

343. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

344. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

345. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 346 is construed as allegations, Defendant Linwood Wilson denies the allegations.

346. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

347. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

348. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the

allegations contained in subparagraphs A, B, C, and D, and, therefore, denies the allegations.

349. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 350 is construed as allegations, Defendant Linwood Wilson denies the allegations.

350. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

351. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

352. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

353. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

354. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

356. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

357 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 358 is construed as allegations, Defendant Linwood Wilson denies the allegations.

358. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

359. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

360. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

362. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 362 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 363 is construed as allegations, Defendant Linwood Wilson denies the allegations.

363. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 363 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 364 is construed as allegations, Defendant Linwood Wilson denies the allegations.

364. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 366 is construed as allegations, Defendant Linwood Wilson denies the allegations.

366. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 366 were provided to the District Attorneys Office through written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb as to Adam, Bret and Matt. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

367. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

368. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

369. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

371. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 372 is construed as allegations, Defendant Linwood Wilson denies the allegations.

372. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

373. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

374. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

375. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the allegations contained in subparagraphs A, B, and C, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 376 is construed as

allegations, Defendant Linwood Wilson denies the allegations.

376. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

377. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

378. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

379. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

380. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

381. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

382. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies

the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, and G, and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 383 is construed as allegations, Defendant Linwood Wilson denies the allegations.

383. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, and E, and, therefore, denies the allegations.

384. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 385 is construed as allegations, Defendant Linwood Wilson denies the allegations.

385. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

386. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 387 are construed as allegations, Defendant Linwood Wilson denies the allegations.

388. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

389. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

390. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. Defendant Linwood Wilson specifically denies any fabrication with Mangum to change the timeline. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations. To the extent that the heading that precedes Paragraph 391 is construed as allegations, Defendant Linwood Wilson denies the allegations.

391. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 393 is construed as allegations, Defendant Linwood Wilson denies the allegations.

393 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

394. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 395 is construed as allegations, Defendant Linwood Wilson denies the allegations.

395. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

396. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

397. Upon information and belief, Defendant Linwood Wilson admits that, at some point, the photos referenced in these allegations were provided the District Attorneys office by either being downloaded from the internet or from Detective

398. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

399. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

400. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

401. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 402 is construed as allegations, Defendant Linwood Wilson denies the allegations.

402. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 403 is construed as allegations, Defendant Linwood Wilson denies the allegations.

403. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations in subparagraphs A, B, C, D, E, and F.

To the extent that the heading that precedes Paragraph 404 is construed as allegations, Defendant Linwood Wilson denies the allegations.

404. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations in subparagraphs A, B, and C.

To the extent that the heading that precedes Paragraph 405 is construed as allegations, Defendant Linwood Wilson denies the allegations.

405. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

406. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 407 is construed as allegations, Defendant Linwood Wilson denies the allegations.

408. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

409. The allegations in Paragraph 409 call for a legal conclusion to which no response is required. To the extent that a response is required, Defendant Linwood Wilson denies the allegations.

410. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

411. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

412. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

413. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 414 is construed as

allegations, Defendant Linwood Wilson denies the allegations.

414. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, and C, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 415 is construed as allegations, Defendant Linwood Wilson denies the allegations.

415. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

416. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

417. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

418. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 419 is construed as allegations, Defendant Linwood Wilson denies the allegations.

420. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

421 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

422. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 423 is construed as allegations, Defendant Linwood Wilson denies the allegations.

423. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

424. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

425. Upon information and belief, Defendant Linwood Wilson admits that the allegations made in 425 were provided to the District Attorneys Office through

written reports by the Durham Police Department Officers and Lead Investigators Himan and Gottlieb. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

426. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

427. Defendant Linwood Wilson admits that the document, which appears to be a photograph, has been attached to Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

428. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

429. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

430. Defendant Linwood Wilson admits that photographs have been attached to Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is

without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 431 is construed as allegations, Defendant Linwood Wilson denies the allegations.

431. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

432. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

433. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

434. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 435 is construed as allegations, Defendant Linwood Wilson denies the allegations.

435. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

437. Defendant Linwood Wilson admits that a photograph has been attached to Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

438. Defendant Linwood Wilson admits that a photograph has been attached to Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 439 is construed as allegations, Defendant Linwood Wilson denies the allegations.

439. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 440 is construed as allegations, Defendant Linwood Wilson denies the allegations.

440. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 441 is construed as allegations, Defendant Linwood Wilson denies the allegations.

441. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

442. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

443. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

444. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 445 is construed as allegations, Defendant Linwood Wilson denies the allegations.

445. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

447. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

448. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

449. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

450. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

451. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

453. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

455. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 456 is construed as allegations, Defendant Linwood Wilson denies the allegations.

456. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, and E.

457. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

458. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 459 is construed as allegations, Defendant Linwood Wilson denies the allegations.

459. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

460. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 461 is construed as allegations, Defendant Linwood Wilson denies the allegations.

461. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

462. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

463. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

464. Defendant Linwood Wilson specifically denies that he or anyone acting on behalf of him had any involvement in any sort of conspiracy as alleged

within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

465. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 466 is construed as allegations, Defendant Linwood Wilson denies the allegations.

466. Upon information and belief, Defendant Linwood Wilson admits that members of the Duke University Police Department provided written statements to the District Attorney's Office. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

467. Upon information and belief, Defendant Linwood Wilson admits that members of the Duke University Police Department provided written statements to the District Attorney's Office. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 468 is construed as allegations, Defendant Linwood Wilson denies the allegations.

468. Upon information and belief, Defendant Linwood Wilson admits that former Duke University Police Officer Mazurek wrote a statement on or about

469. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 470 is construed as allegations, Defendant Linwood Wilson denies the allegations.

470. Upon information and belief, Defendant Linwood Wilson admits that former Duke University Police Officer Sara Falcon wrote a statement on or about March 28, 2006. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

471. Upon information and belief, Defendant Wilson admits that Officer Sara Falcon made a statement which was put in the file at the District Attorneys Office. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

472. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 473 is construed as

allegations, Defendant Linwood Wilson denies the allegations.

473. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

474. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

475. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 476 is construed as allegations, Defendant Linwood Wilson denies the allegations.

476. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations and, therefore, denies the allegations in subparagraphs A and B.

477. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the headings that precede Paragraph 478 are construed as allegations, Defendant Linwood Wilson denies the allegations.

479. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 480 is construed as allegations, Defendant Linwood Wilson denies the allegations.

480. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

481. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

482. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

483. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 484 is construed as allegations, Defendant Linwood Wilson denies the allegations.

484. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

485. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

486. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

487. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

488. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

489. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

491. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

492. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

493. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

494. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

495. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 496 is construed as allegations, Defendant Linwood Wilson denies the allegations.

496. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

497. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

498. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

499. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 500 is construed as allegations, Defendant Linwood Wilson denies the allegations.

500. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. 501. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

502. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, G, H, I, J, K, L, M, N, and O, and, therefore, denies the remaining allegations.

503. Defendant Linwood Wilson admits that a video, referenced as Attachment 12 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 504 is construed as allegations, Defendant Linwood Wilson denies the allegations.

505. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, G, and H, and, therefore, denies the allegations.

506. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 507 is construed as allegations, Defendant Linwood Wilson denies the allegations.

507. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

508. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

509. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

511. Defendant Linwood Wilson admits that a document, referenced as Attachment 13 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

512. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

513. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

514. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

515. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

517. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 518 is construed as allegations, Defendant Linwood Wilson denies the allegations.

518. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

519. Defendant Linwood Wilson admits that a document, referenced as Attachment 14 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

520. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

521. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

523. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

524. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 525 is construed as allegations, Defendant Linwood Wilson denies the allegations.

525. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

526. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

527. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 528 is construed as allegations, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 529 is construed as allegations, Defendant Linwood Wilson denies the allegations.

529. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

530. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

531. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

532. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

533. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 534 is construed as allegations, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 535 is construed as allegations, Defendant Linwood Wilson denies the allegations.

535. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 536 is construed as allegations, Defendant Linwood Wilson denies the allegations.

536. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

537. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

538. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

540. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

541. Upon information and belief, Defendant Linwood Wilson admits that on March 25, 2006, former Athletic Director Alleva and President Brodhead made public statements about the forfeiture of two lacrosse games. Defendant Linwood Wilson became aware of these statements through the media. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

542. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

543. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 544 are construed as allegations, Defendant Linwood Wilson denies the allegations.

545. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

546. Defendant Linwood Wilson admits that a video recording, referenced as Attachment 15 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

547. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

548. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

549. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

550. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the

allegations contained in subparagraphs A, B, C, and D, and, therefore, denies the allegations.

551. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 552 is construed as allegations, Defendant Linwood Wilson denies the allegations.

552. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

553. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 554 is construed as allegations, Defendant Linwood Wilson denies the allegations.

554. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 555 is construed as allegations, Defendant Linwood Wilson denies the allegations.

556. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

557. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

558. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 559 is construed as allegations, Defendant Linwood Wilson denies the allegations.

559. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

560. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

562. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 563 is construed as allegations, Defendant Linwood Wilson denies the allegations.

563. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

564. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 565 is construed as allegations, Defendant Linwood Wilson denies the allegations.

565. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 566 is construed as allegations, Defendant Linwood Wilson denies the allegations.

567. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 568 is construed as allegations, Defendant Linwood Wilson denies the allegations.

568. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

569. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 570 is construed as allegations, Defendant Linwood Wilson denies the allegations.

570. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

572. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

573. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

574. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, and D, and, therefore, denies these allegations.

575. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

576. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 577 is construed as allegations, Defendant Linwood Wilson denies the allegations.

577. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, G, and H, and, therefore, denies the remaining allegations.

578. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

579. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

580. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 581 is construed as allegations, Defendant Linwood Wilson denies the allegations.

582. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

583. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 584 are construed as allegations, Defendant Linwood Wilson denies the allegations.

584. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 585 is construed as allegations, Defendant Linwood Wilson denies the allegations.

585. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

586. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. To the extent that the heading that precedes Paragraph 587 is construed as allegations, Defendant Linwood Wilson denies the allegations.

587. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

588. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

589. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson specifically denies any "agreement" as alleged within Paragraph 589. Defendant Linwood Wilson denies the remaining allegations.

590. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 591 are construed as allegations, Defendant Linwood Wilson denies the allegations.

591. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

593. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 594 is construed as allegations, Defendant Linwood Wilson denies the allegations.

594. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

595. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 596 is construed as allegations, Defendant Linwood Wilson denies the allegations.

596. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

597. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

599. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

600. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

601. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

602. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

603. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

604. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

606. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

607. Defendant Linwood Wilson admits that a photograph has been attached to Plaintiffs' Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

608. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

609. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

610. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 611 is construed as allegations, Defendant Linwood Wilson denies the allegations.

612. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

613. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

614. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

615. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

616. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 617 are construed as allegations, Defendant Linwood Wilson denies the allegations.

618. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

619. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

620. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 621 is construed as allegations, Defendant Linwood Wilson denies the allegations.

621. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

622. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

624. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

625. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

626. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, and E, and, therefore, denies the allegations. To the extent that the heading that precedes Paragraph 627 is construed as allegations, Defendant Linwood Wilson denies the allegations.

627. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

628. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

630. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

631. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, and G.

632. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

633. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

634. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

635. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

637. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

638. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

639. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

640. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the headings that precede Paragraph 641 are construed as allegations, Defendant Linwood Wilson denies the allegations.

641. The allegation in Paragraph 641 calls for a legal conclusion to which no response is required. To the extent that a response is required, Defendant Linwood Wilson denies the allegations.

642. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the

allegations contained in subparagraphs A, B, and C, and, therefore, denies the allegations.

643. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 644 is construed as allegations, Defendant Linwood Wilson denies the allegations.

644. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 645 is construed as allegations, Defendant Linwood Wilson denies the allegations.

645. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

646. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 647 are construed as allegations, Defendant Linwood Wilson denies the allegations.

647. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies

the allegations, including the allegations contained in subparagraphs A, B, C, D, and E, and, therefore, denies the remaining allegations.

648. Defendant Linwood Wilson admits that former District Attorney Nifong generated significant media coverage regarding the investigation into Ms. Mangum's allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

649. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

650. Defendant Linwood Wilson admits that a video, referenced as Attachment 16 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

651. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

652. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

654. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 655 is construed as allegations, Defendant Linwood Wilson denies the allegations.

655. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

656. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

657. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

658. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 660 is construed as allegations, Defendant Linwood Wilson denies the allegations.

660. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

661. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

662. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

663. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

664. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 666 are construed as allegations, Defendant Linwood Wilson denies the allegations.

666. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

667. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

668. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, and G, and, therefore, denies the allegations.

669. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 670 is construed as allegations, Defendant Linwood Wilson denies the allegations.

671. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

672. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

673. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

674. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

675. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 676 is construed as allegations, Defendant Linwood Wilson denies the allegations.

677. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

678. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the allegations contained in subparagraphs A, B, and C, and, therefore, denies the allegations.

679. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

680. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

681. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

682. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

684. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

685. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

686. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

687. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 688 are construed as allegations, Defendant Linwood Wilson denies the allegations.

688. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

690. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

691. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

692. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 693 is construed as allegations, Defendant Linwood Wilson denies the allegations.

693. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

694. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

696. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

698. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

699. Defendant Linwood Wilson admits that a video file, referenced as Attachment 17 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the remaining allegations.

700. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

701. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 703 is construed as allegations, Defendant Linwood Wilson denies the allegations.

703. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

704. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

705. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 706 are construed as allegations, Defendant Linwood Wilson denies the allegations.

706. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

707. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

709. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

710. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

711. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

712. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

713 Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

714. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

716. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

717. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

718. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

719. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

721. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 722 is construed as allegations, Defendant Linwood Wilson denies the allegations.

722. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

723. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

724. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

725. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

726. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

727. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 728 is construed as allegations, Defendant Linwood Wilson denies the allegations.

729. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

730. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 731 is construed as allegations, Defendant Linwood Wilson denies the allegations.

731. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

732. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

733. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

735. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

736. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

737. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

738. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

739. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 740 is construed as allegations, Defendant Linwood Wilson denies the allegations.

741. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

742. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

743. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 744 is construed as allegations, Defendant Linwood Wilson denies the allegations.

744. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

745. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 746 is construed as allegations, Defendant Linwood Wilson denies the allegations.

747. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

748. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

749. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

750. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

751. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

752. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

753. Defendant Linwood Wilson admits that a video, referenced as Attachment 18 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

754. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

755. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

756. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

757. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 758 is construed as allegations, Defendant Linwood Wilson denies the allegations.

758. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

759. Defendant Linwood Wilson admits that a chart accompanies the allegations in Paragraph 759. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

760. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

761. Defendant Linwood Wilson admits that a document, referenced as Attachment 19, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

762. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, including the allegations contained in subparagraphs A, B, C, and D, and, therefore, denies the allegations.

763. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

764. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 765 is construed as allegations, Defendant Linwood Wilson denies the allegations.

765. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

766. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

767. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

768. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 769 is construed as allegations, Defendant Linwood Wilson denies the allegations.

769. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

770. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

772. Upon information and belief, Defendant Linwood Wilson admits that the Attorney General's office issued a report of its review of the evidence arising from the rape allegations that are the subject of this Second Amended Complaint. Other than from reading the report of those findings, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 773 is construed as allegations, Defendant Linwood Wilson denies the allegations.

773. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

774. Defendant Linwood Wilson admits that a video, referenced as Attachment 20 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

775. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

777. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

778. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 779 is construed as allegations, Defendant Linwood Wilson denies the allegations.

779. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 780 is construed as allegations, Defendant Linwood Wilson denies the allegations.

780. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

781. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

782. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. With respect to subparagraphs B and D, Defendant Linwood Wilson admits that videos, referenced as Attachments 21 and 22 to Plaintiffs' Second Amended Complaint, have been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, and E, and, therefore, denies the remaining allegations, including the allegations contained in subparagraphs A, B, C, D, and E.

783. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 784 is construed as allegations, Defendant Linwood Wilson denies the allegations.

784. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 785 is construed as allegations, Defendant Linwood Wilson denies the allegations.

785. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. Defendant Linwood Wilson is without knowledge or information

sufficient to form a belief about the truth of the allegations, including the allegations contained in subparagraphs A, B, and C, and, therefore, denies the remaining allegations, including the allegations contained in subparagraphs A, B, and C.

786. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

787. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

788. Defendant Wilson admits that he was part of an interview conducted in the DA's office by Durham Police Detective Himan of Nurse Levicy. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

789. Defendant Linwood Wilson specifically denies that he was part of any agreement with Defendants Nifong, Gottlieb and Himan and Levicy that Nurse Levicy would testify to forensic medical evidence that she did not observe and did not exist. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

791. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

792. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

793. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

794. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

795. Defendant Linwood Wilson admits that Nurse Levicy responded to multiple questions about condoms during her interview on January 10, 2007. To the extent Paragraph 795 characterizes statements made by Nurse Levicy, Defendant Linwood Wilson denies that characterization. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

796. Upon information and belief, Defendant Linwood Wilson admits that Nurse Levicy stated that she "wasn't surprised when [she] heard no DNA was found because rape is not about passion or ejaculation but about power." Defendant Linwood Wilson also admits that Nurse Levicy called him back to clarify her statement on the next day. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

797. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

798. Defendant Linwood Wilson admits that he met Nurse Levicy and Investigator Himan on the evening of January 10, 2007. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

799. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson admits that Nurse Levicy called him back to clarify her statement on the next day. Nurse Levicy's telephone statement to Defendant Linwood Wilson was cleary to say, "that in addition to the use of condoms the other possibility was that no rape occurred". Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

To the extent that the headings that precede Paragraph 800 are construed as allegations, Defendant Linwood Wilson denies the allegations.

800. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

801. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

802. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

803. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, and G, and, therefore, denies the allegations, including the allegations contained in subparagraphs A, B, C, D, E, F, and G.

804. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 805 is construed as allegations, Defendant Linwood Wilson denies the allegations.

806. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

807. Defendant Linwood Wilson admits that two videos, referenced as Attachment 23 to Plaintiffs' Second Amended Complaint, have been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

808. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

809. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

810. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 812 is construed as allegations, Defendant Linwood Wilson denies the allegations.

812. Defendant Linwood Wilson admits that documents, referenced as Attachment 24 to Plaintiffs' Second Amended Complaint, have been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

813. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

814. Defendant Linwood Wilson specifically denies that he took any actions that violated "Plaintiffs' federally protected rights." Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

815. Defendant Linwood Wilson admits that a video file, referenced as Attachment 25, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 816 is construed as allegations, Defendant Linwood Wilson denies the allegations.

816. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

817. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 818 is construed as allegations, Defendant Linwood Wilson denies the allegations.

818. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. To the extent that Paragraph 818 alleges any actions by Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

819. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 820 is construed as allegations, Defendant Linwood Wilson denies the allegations.

821. To the extent the allegations in Paragraph 821 are construed to include Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

822. To the extent the allegations in Paragraph 822 are construed to include Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 823 is construed as allegations, Defendant Linwood Wilson denies the allegations.

823. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

824. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

826. To the extent that Paragraph 826 purports to characterize any statements made by Defendant Linwood Wilson, Defendant Linwood Wilson denies the characterizations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 827 is construed as allegations, Defendant Linwood Wilson denies the allegations.

827. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

828. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

829. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

830. Defendant Linwood Wilson admits that a video, referenced as Attachment 26 to Plaintiffs' Second Amended Complaint, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient

to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

831. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

832. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

833. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

834. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

835. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

836. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

838. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

839. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

840. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

841. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

842. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

843. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

845. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

846. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

847. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

848. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

849. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

850. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

852. Defendant Linwood Wilson admits that a document, referenced as
Attachment 27, has been filed with the Court. Defendant Linwood Wilson is
without knowledge or information sufficient to form a belief about the truth of the
remaining allegations, and, therefore, denies the remaining allegations.
To the extent that the heading that precedes Paragraph 853 is construed as
allegations, Defendant Linwood Wilson denies the allegations.

853. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

854. The allegations in Paragraph 854 call for a legal conclusion to which no response is required. To the extent that a response is required, Defendant Linwood Wilson denies the allegations.

855. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

856. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

858. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

859. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

860. Defendant Linwood Wilson cannot admit or deny this allegation because it refers to unnamed "others". To the extent that an answer is required on behalf of these unnamed "others", Defendant Linwood Wilson denies the allegations. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies these remaining allegations.

861. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

862. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

864. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

865. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

866. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. To the extent that the allegation "among others", contained in paragraph 866, includes Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations.

867. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

868. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. To the extent that the allegation "among others", contained in paragraph 868, includes Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations.

869. Upon information and belief, Defendant Linwood Wilson admits that the court granted the motion to quash the subpoena for the DukeCard information. Other than court records, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

870. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

871. Defendant Linwood Wilson admits that a video file, referenced as Attachment 28, has been filed with the Court. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations. To the extent that the heading that precedes Paragraph 872 is construed as allegations, Defendant Linwood Wilson denies the allegations.

872. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

873. Defendant Linwood Wilson specifically denies any participation in any sort of conspiracy as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. To the extent that the heading that precedes Paragraph 874 is construed as allegations, Defendant Linwood Wilson denies the allegations.

874. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

875. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

876. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations. To the extent that the allegation "among others", contained in paragraph 876, includes Defendant Linwood Wilson, Defendant Linwood Wilson denies the allegations.

877. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

878. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

879. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

881. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

882. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

883. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

884. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

885. Defendant Linwood Wilson specifically denies that he was a part of any type of "consortium" as alleged within this Second Amended Complaint. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and, therefore, denies the remaining allegations.

887. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 888 is construed as allegations, Defendant Linwood Wilson denies the allegations.

888. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

889. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the heading that precedes Paragraph 890 is construed as allegations, Defendant Linwood Wilson denies the allegations.

890. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

891. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

893. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

894. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

895. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

896. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

To the extent that the headings that precede Paragraph 897 are construed as allegations, Defendant Linwood Wilson denies the allegations.

897. Upon information and belief, Defendant Linwood Wilson admits that the North Carolina Attorney General's office conducted an independent investigation of the evidence. Other than reports of those findings, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

898. Upon information and belief, Defendant Linwood Wilson admits that the North Carolina Attorney General's office conducted an independent investigation of the evidence. Other than reports of those findings, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

899. Upon information and belief, Defendant Linwood Wilson admits that the North Carolina Attorney General's office conducted an independent investigation of the evidence. Other than reports of those findings, Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations. To the extent that Defendant Linwood Wilson is alleged to be part of "and other defendants", as alleged in paragraph 899, Defendant Linwood Wilson denies those allegations.

900. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 901 is construed as allegations, Defendant Linwood Wilson denies the allegations.

901. Upon information and belief, Defendant Linwood Wilson admits that former District Attorney Nifong was disbarred by the North Carolina State Bar for his actions relating to the prosecution of David Evans, Colin Finnerty, and Reade Seligmann. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the remaining allegations and, therefore, denies the remaining allegations.

To the extent that the heading that precedes Paragraph 902 is construed as allegations, Defendant Linwood Wilson denies the allegations.

902. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations. To the extent that Defendant Linwood Wilson is alleged to be consider as "and others to conceal from the Plaintiffs the exonerating DNA evidence they were required to produce to Plaintiffs immediately", Defendant Linwood Wilson denies the allegations.

903. To the extent Defendant Linwood Wilson is alleged to have "done" anything in Paragraph 903, Defendant Linwood Wilson denies the allegations. To the extent that the heading that precedes Paragraph 904 is construed as allegations, Defendant Linwood Wilson denies the allegations.

904. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 903 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

905. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

906. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

907. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

908. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

909. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

910. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations. To the extent that Defendant Linwood Wilson is alleged to have been part of any sort of conspiracy, Defendant Linwood Wilson denies the allegations.

911. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

912. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

913. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

914. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

915. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

916. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

917. The cause of action alleged in Count 1 does not include or list Defendant Linwood Wilson as being a named defendant in Count 1. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

918. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 917 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

919. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

920. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

921. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

922. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

923. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

924. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

925. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

926. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

927. The cause of action alleged in Count 2 does not include or list Defendant Linwood Wilson as being a named defendant in Count 2. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

928. The cause of action alleged in Count 2 does not include or listDefendant Linwood Wilson as being a named defendant in Count 2. To the extenta response is required, Defendant Linwood Wilson denies the allegations.To the extent that the heading that precedes Paragraph 929 is construed asallegations, Defendant Linwood Wilson denies the allegations.

929. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

930. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

931. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

932. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

933. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

934. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

935. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

936. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

937. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 938. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

939. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

940. The cause of action alleged in Count 3 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 941 is construed as allegations, Defendant Linwood Wilson denies the allegations.

941. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

942. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

943. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 944. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

945. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

946. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

947. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

948. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

949. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

950. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 951. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

952. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

953. The cause of action alleged in Count 4 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 954 is construed as allegations, Defendant Linwood Wilson denies the allegations.

954. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 953 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

955. Defendant Linwood Wilson denies the allegations

956. Defendant Linwood Wilson denies the allegations, including subparagraphs A, B, C, D, E, F, G, H, I. Defendant Linwood Wilson specifically denies being involved in any "conspiracy" or "acting in concert" as set out in the Second Amended Complaint.

957. Defendant Linwood Wilson denies the allegations, including subparagraphs A, B, C, D, E, F, G.

958. Defendant Linwood Wilson denies the allegations.

959. Defendant Linwood Wilson denies the allegations.

960. Defendant Linwood Wilson denies the allegations.

961. Defendant Linwood Wilson denies the allegations.

962. Defendant Linwood Wilson denies the allegations.

To the extent that the heading preceding Paragraph 963 is construed as allegations, Defendant Linwood Wilson denies the allegations.

963. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

964. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

965. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

966. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

967. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations, and, therefore, denies the allegations.

969. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

970. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

971. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

972. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

973. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

974. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 975. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

976. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

977. The cause of action alleged in Count 6 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 978 is construed as allegations, Defendant Linwood Wilson denies the allegations.

978. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

979. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

980. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 981. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

982. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

983. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

984. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

985. The cause of action alleged in Count 7 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 986 is construed as allegations, Defendant Wilson denies the allegations.

986. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 987. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

988. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

989. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

990. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

991. The cause of action alleged in Count 8 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 992 is construed as allegations, Defendant Linwood Wilson denies the allegations.

992. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 993. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

994. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

995. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

996. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

997. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

998. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

999. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1000. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1001. The cause of action alleged in Count 9 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1002 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1002. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1003. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1004. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1005. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1006. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1007. The cause of action alleged in Count 10 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1008 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1008. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1009 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1009. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1010. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1011. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1012. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1013. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1014. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1015. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1016. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1017. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1018. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1019. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1020. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1021 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1021. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1022. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1023. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1024. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1025 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1025. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1026. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1027. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1028. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1029. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1030. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1031. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1032 is construed as

allegations, Defendant Linwood Wilson denies the allegations.

1032. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1033. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1034. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1035. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1036. The cause of action alleged in Count 11 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1037 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1037. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1036 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

To the extent that the headings that precede Paragraph 1039 are construed as allegations, Defendant Linwood Wilson denies the allegations.

1039. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1040. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1041. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1042. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1044. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1045. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1046 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1046. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1047. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1049. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1050. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1051. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1052. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1053. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1054. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1055 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1055. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1056. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1057. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1058. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1059. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1060. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1061 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1061. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1062. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1063. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1064. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1065. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the headings that precede Paragraph 1066 are construed as allegations, Defendant Linwood Wilson denies the allegations.

1066. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1067. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1068. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1069. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1070. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1071. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1072. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1073. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1074 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1074. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1075. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1076. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1077. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1078 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1078. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1079. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1080. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1081. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1082. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1083. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1085. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1086. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1087. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1088 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1088. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1090. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1091. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1092. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1093. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1094. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March

1095. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1096. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1097. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1098. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1099. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1101. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1102. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1103. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1104. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1105. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1106. The cause of action alleged in Count 12 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1107 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1107. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1106 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1108. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1109. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1110. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1111. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1112. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1113. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1114. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1115. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1117. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1118. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1119. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1120. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1121. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1122. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1123. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1124 The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1125 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1125. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1126. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of

1127. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1128. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1129. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1130. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1131. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1133. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1134 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1134. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1135. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1136. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1138. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1139. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1140. The cause of action alleged in Count 13 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1141 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1141. The cause of action alleged in Count 14 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1143. The cause of action alleged in Count 14 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1144. The cause of action alleged in Count 14 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1145. The cause of action alleged in Count 14 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1146. The cause of action alleged in Count 14 was dismissed to the extent that it was asserted against Defendant Linwood Wilson by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1147 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1147. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1148. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1149. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1150. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1151. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1152. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1153. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1154. The cause of action alleged in Count 15 was dismissed by the Court's

1155. The cause of action alleged in Count 15 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1156 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1156. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1157. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1158. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1159. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1160. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1161. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1162. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1163. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1164. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1165. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1166. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1167. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1168. The cause of action alleged in Count 16 was dismissed by the Court's

1169. The cause of action alleged in Count 16 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1170 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1170. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1171. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1172. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1173. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1174. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1175. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1176. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1177. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1178. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1179. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1180. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1181. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1182. The cause of action alleged in Count 17 was dismissed by the Court's

1183. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1184. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1185. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1186. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1187. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1188. The cause of action alleged in Count 17 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1189 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1189. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1188 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1190. Defendant Linwood Wilson specifically denies being part of any conspiracy as alleged in the Second Amended Complaint. Defendant Linwood Wilson denies the allegations.

1191. Defendant Linwood Wilson denies the allegations.

1192. Defendant Linwood Wilson denies the allegations.

1193. Defendant Linwood Wilson denies the allegations.

1194. Defendant Linwood Wilson denies the allegations.

1195. Defendant Linwood Wilson denies the allegations.

1196. Defendant Linwood Wilson is not alleged in Paragraph 1196. To the extent that Defendant Linwood Wilson is required to respond, Defendant Linwood Wilson denies the allegations.

1197. Defendant Linwood Wilson denies the allegations.

1198. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, Defendant Linwood Wilson denies the allegations.

1199. Defendant Linwood Wilson denies the allegations.

1200. Defendant Linwood Wilson denies the allegations.

1201. Defendant Linwood Wilson denies the allegations.

1202. Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1203 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1203. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1204. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1205. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1206. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1207. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1208. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1209. The cause of action alleged in Count 19 was dismissed by the Court's

1210. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1211. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1212. The cause of action alleged in Count 19 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1213 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1213. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1214. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1215. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1216. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1217. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1218. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1219. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1220. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1221. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1222. The cause of action alleged in Count 20 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1223 is construed as

allegations, Defendant Linwood Wilson denies the allegations.

1223. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1222 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1224. The cause of action alleged in Count 21 does not include or list Defendant Linwood Wilson as being a named defendant in Count 21. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1225. The cause of action alleged in Count 21 does not include or list Defendant Linwood Wilson as being a named defendant in Count 21. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1226. The cause of action alleged in Count 21 does not include or list Defendant Linwood Wilson as being a named defendant in Count 21. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1227. The cause of action alleged in Count 21 does not include or list Defendant Linwood Wilson as being a named defendant in Count 21. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1228. The cause of action alleged in Count 21 does not include or list Defendant Linwood Wilson as being a named defendant in Count 21. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1229. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1230. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1231. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1232. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1233. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1234. The cause of action alleged in Count 22 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1235 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1235. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1236. The cause of action alleged in Count 23 was dismissed by the Court's

1237. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1238. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1239. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1240. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1241. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1242. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1243. The cause of action alleged in Count 23 was dismissed by the Court's

1244. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1245. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1246. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1247. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1248. The cause of action alleged in Count 23 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1249 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1249. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1248 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations. 1250. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1251. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1252. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1253. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1254. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1255. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1256. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1257. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1258. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1259. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1260. The cause of action alleged in Count 24 does not include or list Defendant Linwood Wilson as being a named defendant in Count 24. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1261. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1260 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1262. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1263. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1264. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1265. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1266. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1267. The cause of action alleged in Count 25 does not include or list Defendant Linwood Wilson as being a named defendant in Count 25. To the extent a response is required, Defendant Linwood Wilson denies the allegations. To the extent that the heading that precedes Paragraph 1268 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1268. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1267 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1269. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1270. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1271. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1272. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1273. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1274. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1275. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1276. The cause of action alleged in Count 26 does not include or list Defendant Linwood Wilson as being a named defendant in Count 26. To the extent a response is required, Defendant Linwood Wilson denies the allegations. To the extent that the heading that precedes Paragraph 1277 is construed as

allegations, Defendant Wilson denies the allegations.

1277. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1278. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1279. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1280. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1281. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1282. The cause of action alleged in Count 27 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1283 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1283. The cause of action alleged in Count 28 was dismissed by the Court's

1284. The cause of action alleged in Count 28 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1285. The cause of action alleged in Count 28 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1286. The cause of action alleged in Count 28 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1287. The cause of action alleged in Count 28 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1288. The cause of action alleged in Count 28 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1289 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1289. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1290. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1291. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1292. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1293. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1294. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1295. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1296. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1297. The cause of action alleged in Count 29 was dismissed by the Court's

1298. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1299. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1300. The cause of action alleged in Count 29 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1301 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1301. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1302. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1303. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1304. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1305. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1306. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1307. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1308. The cause of action alleged in Count 30 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1309 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1309. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1310. The cause of action alleged in Count 31 was dismissed by the Court's

1311. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1312. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1313. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1314. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1315. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1316. The cause of action alleged in Count 31 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1317. The cause of action alleged in Count 31 was dismissed by the Court's

To the extent that the heading that precedes Paragraph 1318 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1318. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1317 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1319. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1320. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1321. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1322. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1323. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1324. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1325. The cause of action alleged in Count 32 does not include or list Defendant Linwood Wilson as being a named defendant in Count 32. To the extent a response is required, Defendant Linwood Wilson denies the allegations. To the extent that the heading that precedes Paragraph 1326 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1326. The cause of action alleged in Count 33 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1327. The cause of action alleged in Count 33 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1328. The cause of action alleged in Count 33 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1329. The cause of action alleged in Count 33 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1330. The cause of action alleged in Count 33 was dismissed by the Court's

1331. The cause of action alleged in Count 33 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1332 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1332. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1333. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1334. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1335. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1336. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1337. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1338. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1339. The cause of action alleged in Count 34 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1340 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1340. To the extent that the contents of Paragraph 1340 are allegations, Defendants Linwood Wilson denies the allegations.

1341. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1340 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations.

1342. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1343. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1344. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1345. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1346. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1347. The cause of action alleged in Count 35 does not include or list Defendant Linwood Wilson as being a named defendant in Count 35. To the extent a response is required, Defendant Linwood Wilson denies the allegations. To the extent that the heading that precedes Paragraph 1348 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1348. The cause of action alleged in Count 36 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1349. The cause of action alleged in Count 36 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1350. The cause of action alleged in Count 36 was dismissed by the Court's

1351. The cause of action alleged in Count 36 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1352. The cause of action alleged in Count 36 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1353. The cause of action alleged in Count 36 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1354 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1354. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1355. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1356. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1357. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1358. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1359. The cause of action alleged in Count 37 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1360 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1360. The cause of action alleged in Count 38 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1361. The cause of action alleged in Count 38 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1362. The cause of action alleged in Count 38 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1363. The cause of action alleged in Count 38 was dismissed by the Court's

1364. The cause of action alleged in Count 38 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1365. The cause of action alleged in Count 38 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1366 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1366. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1367. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1368. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1369. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations. 1370. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1371. The cause of action alleged in Count 39 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1372 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1372. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1373. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1374. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1375. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1376. The cause of action alleged in Count 40 was dismissed by the Court's

1377. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1378. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1379. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1380. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

1381. The cause of action alleged in Count 40 was dismissed by the Court's Order of March 31, 2011. To the extent a response is required, Defendant Linwood Wilson denies the allegations.

To the extent that the heading that precedes Paragraph 1382 is construed as allegations, Defendant Linwood Wilson denies the allegations.

1382. Defendant Linwood Wilson incorporates by reference and restates his responses to paragraphs 1 through 1381 as if fully set forth herein. Defendant Linwood Wilson denies the remaining allegations. 1383. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

1384. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

1385. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

1386. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

1387. Defendant Linwood Wilson is without knowledge or information sufficient to form a belief about the truth of the allegations and, therefore, denies the allegations.

1388. Defendant Linwood Wilson denies the allegations, including the allegations contained in subparagraphs A, B, C, D, and E.

#### FIRST AFFIRMATIVE DEFENSE

To the extent Plaintiffs seek to hold Defendant Linwood Wilson responsible for the action or inaction of the City of Durham, the Durham Defendants, the Duke University Defendants, the Duke University Police Defendants, or the Duke SANE Defendants, Defendant Wilson incorporates any

defenses asserted by, or available to, the City of Durham, the Durham Defendants, the Duke University Defendants, the Duke University Police Defendants, or the Duke SANE Defendants.

#### SECOND AFFIRMATIVE DEFENSE

To the extent that Defendant Linwood Wilson, is determined to be a state actor, then Defendant Linwood Wilson is entitled to the same privileges and immunities as any other state actor including prosecutorial immunity and qualified immunity.

#### THIRD AFFIRMATIVE DEFENSE

Plaintiffs have waived and/or are estopped from asserting any and all claims they may have or have had against Defendant Linwood Wilson.

## FOURTH AFFIRMATIVE DEFENSE

The damages sustained by Plaintiffs, if any, were proximately caused by the intervening and superseding acts of other persons or parties over whom Defendant Linwood Wilson had no control and for whose conduct Defendant Linwood Wilson is not reasonably responsible. These intervening and superseding acts were not reasonably foreseeable to Defendant Linwood Wilson. These acts bar and/or diminish Plaintiffs' recovery, if any, against Defendant Linwood Wilson. By way of example, these intervening and superseding acts include, but are not limited to, the false rape allegations made by Crystal Mangum and the actions of former District Attorney Michael Nifong in directing the investigation of those allegations.

## FIFTH AFFIRMATIVE DEFENSE

Plaintiffs failed to mitigate their damages.

## SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the applicable statutes of limitations and periods of limitations and repose. To the extent that any of Plaintiffs' claims are equitable in nature, they are barred by the doctrine of laches.

#### SEVENTH AFFIRMATIVE DEFENSE

Any award of punitive damages violates the United States Constitution, the Constitution of the State of North Carolina, and other applicable state and federal laws, in that an award of punitive damages is impermissible in this case because it would (1) constitute an excessive fine and forfeiture in contravention of the Eighth Amendment of the United States Constitution and corresponding state constitution provisions, (2) violate the Defendant Linwood Wilson's right to due process and equal protection of the laws in contravention of the Fourteenth Amendment to the United States Constitution and corresponding state constitution provisions, (3) violate Defendant Linwood Wilson's right to procedural safeguards provided by the Sixth Amendment to the United States Constitution for alleged penal conduct, including but not limited to permitting imposition of punitive damages with a burden of proof less than "beyond a reasonable doubt", and (4) bear no proportional or rational relationship to any actual damages or to the type of conduct involved and violates the United States Constitution the Constitution of the State of North Carolina, and other applicable laws, including but not limited to

the provisions of Chapter 1D of the North Carolina General Statutes. Defendant Linwood Wilson reserves the right to assert any additional and further defenses as may be revealed during discovery or upon receipt of additional information.

# JURY TRIAL DEMAND

Defendant Linwood Wilson respectfully demand trial by jury on all issues so triable in this action.

## **PRAYER FOR RELIEF**

WHEREFORE, Defendant Linwood Wilson requests that this Court:

1. Dismiss this action with prejudice;

2. Denies any relief to Plaintiffs; and

3. For such other and further relief as the Court deems just and proper.

This the 14th day of June, 2011. /s/ Linwood Wilson, *Pro Se* 6910 Innesbrook Way Bahama, North Carolina 27503 Telephone: (919) 471-8950 Email: LinwoodW@aol.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2011, I electronically filed the foregoing Answer of Defendant Linwood Wilson with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

This 14th day of June, 2011. /s/ Linwood Wilson, *Pro Se* 6910 Innesbrook Way Bahama, North Carolina 27503 Telephone: (919) 471-8950 Email: LinwoodW@aol.com