IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION



	APR 1 9 2011
TODD MONTGOMERY FOREMAN, pro se) Western district court)
Plaintiff,))
VS.)
CHARLOTTE SCHOOL OF LAW (NC), INC.; CHARLOTTE SCHOOL OF LAW, LLC; INFILAW CORPORATION; SHIRLEY FULTON; HENRY RAMSEY, JR.; DENNIS ARCHER; RICHARD INATOME; DENNIS STONE; CHIDI OGENE; RENEE HILL; DENISE SPRIGGS; CARLA BOLES; MALIK EDWARDS; BRIANA URBINA; LESLEE WILLIAMS-POTTER; AMBER HOLT; JANE DOE 1-99; and JOHN DOE 1-99.	RESPONSE TO DEFENDANTS ANSWER CASE No. 3:11-cv-00098-MOC-DSC CASE No. 3:11-cv-00098-MOC-DSC
Defendants.))

PLAINTIFFS RESPONSE

HEREBY, Plaintiff submits to the Court his response to Defendants Answer submitted with the

United States District Court the Western District of North Carolina on the 13th day of April,

2011, See Docket 34. Plaintiff preserves all objections to Defendants Answer containing factually erroneous statements supported by clear and convincing evidence presented by Plaintiff, See Exhibits 1-63, Plaintiff submits to the Court his response to their reply, et seq.

FOR A THIRTY-FOURTH DEFENSE

As to all claims

Plaintiff denies Defendants are protected by affirmative defenses and looks forward to discovery.

FOR A THIRTY-THIRD DEFENSE

As to all claims

Plaintiff denies Defendants assertion they are only liable for direct causes as proximate causation has clearly been established.

FOR A THIRTY-SECOND DEFENSE

As to all claims

Plaintiff denies Defendants assertion he has not mitigated damages.

FOR A THIRTY-FIRST DEFENSE

As to all claims

Plaintiff denies Defendants assertions as it's the intention the State of North Carolina legislature to hold those accountable, either criminally or civilly, for said offenses.

FOR A THIRTIETH DEFENSE

As to Plaintiffs 22nd through 41st Causes of Action

Plaintiff denies Defendants allegations as he clearly did not initiate any email. Plaintiff denies Defendants allegations that a debated existed.

FOR A TWENTY-NINTH DEFENSE

As to Plaintiffs 22nd through 41st Causes of Action

Plaintiff denies Defendants allegations as he clearly did not consent to having her personal information blasted around school in secret then to be targeted with libelous statements.

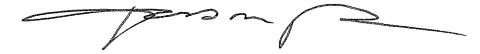
FOR A TWENTY-EIGHTH THROUGH FIRST DEFENSE

As to all claims

Plaintiff denies all and looks forward to discovery and trial moving forward.

This the 19th day of April, 2011.

Respectfully submitted,



pro se

Todd Montgomery Foreman

(<u>Redacted</u>)

Charlotte, North Carolina (Redacted)

Telephone: (*Redacted*)

E-mail: toddforeman@RocketMail.com

I HEREBY CERTIFY, pursuant with FRCP 4(l)(1)(3), LCvR 5.3(b)(c), North Carolina Gen. Stat XXX7A-311, and Western District of North Carolina Administrative Procedures II(B)(4) and III(A), that on the 19th day of April, 2011, I filed the foregoing document with the Clerk of Court in person. I also certify that the foregoing document is being served this day of record in the manner specified below:

CharlotteLaw, CharlotteLaw LLC, InfiLaw Corp., Sterling Partners, Fulton, Ramsey, Archer, Inatome, Stone, Ogene, Hill, Spriggs, Boles, Edwards, Urbina, Williams-Potter, and Holt.

Fisher & Phillips, LLP, attorney on record.

227 W. Trade Street, Suite 2020

Charlotte, North Carolina 28202

This the 19th day of April, 2011.

Respectfully submitted,

pro	3	SP
$\mu \iota$,	30

Todd Montgomery Foreman

(Redacted)
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