

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

FILED
CHARLOTTE, NC

APR 19 2011

U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

TODD MONTGOMERY FOREMAN, *pro se*

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.

Defendants.

RESPONSE TO DEFENDANTS
ANSWER

CASE No. 3:11-cv-00098-MOC-DSC

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~~ed~~ 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 ^{his} ~~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,



Todd Montgomery Foreman *pro se*
(Redacted)
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,



Todd Montgomery Foreman
(*Redacted*)
Charlotte, North Carolina (*Redacted*)
Telephone: (*Redacted*)
E-mail: toddforeman@RocketMail.com