

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAJOR LEAGUE BASEBALL
PLAYERS ASSOCIATION

Plaintiff,

v.

S.F. ADVISORS, LLC, D/B/A
AFFINITY CLUB NETWORK, LLC,
JOHN LAROCCA, RAVI V. KOTHARE,
AND DAVID M. MASER

Defendants.

Case No.: 06-5211

ANSWER OF DEFENDANT, JOHN LAROCCA, TO THE COMPLAINT

1-3. DENIED.

4. DENIED. It is denied that the defendant, John LaRocca, is an owner of S.F. Advisors, LLC. On the contrary, Mr. LaRocca is not an owner, officer, director, shareholder, or otherwise associated with this defendant. Moreover, Mr. LaRocca did not incorporate this defendant nor did he serve as counsel to the defendant at any time.

5-88. DENIED.

FIRST AFFIRMATIVE DEFENSE

The defendant, John LaRocca, is not an officer, director, shareholder, agent, officer and/or employee of defendant S.F. Advisors, LLC, d/b/a Affinity Club Network, LLC, Ravi V. Kothare or David M. Maser. The defendant, John LaRocca, did not incorporate any other defendant. He does not currently act and he has never acted as counsel to any other defendant. Defendant, John LaRocca's sole involvement was in permitting the other defendants to use his address for the receipt of mail until such time as they established a permanent office. This was

done as a courtesy for which Mr. LaRocca received no compensation or promise of compensation.

SECOND AFFIRMATIVE DEFENSE

No conduct by John LaRocca caused injury, damage, and/or loss to the plaintiffs.

THIRD AFFIRMATIVE DEFENSE

The plaintiffs' action is or may be barred by failure to effect proper process and/or service of process.

FOURTH AFFIRMATIVE DEFENSE

This Court is without jurisdiction over this matter and/or over the person of defendant, John LaRocca.

JURY TRIAL DEMAND

A jury trial is demanded to all issues.

Respectfully Submitted,

By: BPM3633
BRIAN P. MCVAN, ESQ.
Attorney for Defendant,
John LaRocca

Date: December 20, 2006

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PROOF OF FILING AND/OR SERVICE

I, Brian P. McVan, hereby certify as follows:

(1) I am an attorney at law admitted before the bar of this Court;

(2) On December 20, 2006, I filed the original of the Answer to the Complaint on behalf of the Defendant, John LaRocca, by submitting it electronically to the Clerk of Court at the United States Courthouse in Philadelphia, Pennsylvania;

(3) On December 20, 2006, I served a copy via first class U.S. mail, on counsel for plaintiff;

(4) I certify that the foregoing statements by me are true. If any of the foregoing statements made by me are wrongfully false I am subject to punishment.

BPM3633
BRIAN P. MCVAN, ESQ.