

1 THE HONORABLE MARY E. ROBERTS
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9 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
10 IN AND FOR THE COUNTY OF KING

11 ELIZABETH BUSLON; JESSILYN
12 ROBERTS; AMY DAVID; LAUREN
13 BAUMANN; DANIELLE ESQUIBEL; and
14 JOE DAVID,

15 Plaintiffs,

16 vs.

17 SEATTLE IMPACT FC, a Washington
18 company; PASL SOCCER LLC, a Delaware
19 company doing business as the MAJOR
20 ARENA SOCCER LEAGUE; KEVIN
21 MILLIKEN, individually and as Commissioner
of the Major Arena Soccer League; DION LEE
EARL, individually and the marital community
of DION and LAUREL EARL,

22 Defendants.

No. 14-2-30325-4 KNT

ANSWER FOR DEFENDANTS SEATTLE
IMPACT FC AND DION EARL

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24 Defendants SEATTLE IMPACT FC (Herein Impact) and DION LEE EARL
25 (Herein Earl) hereby answer the Complaint as set forth below. Each numbered paragraph
26 in the Answer corresponds with the same number in the Complaint:

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I. ANSWER

1.1 Defendant is without sufficient information to admit or deny the allegations, and therefore denies the same.

1.2 Defendant admits that he was invited to join the Major Arena Soccer League (herein MASL) in May 2014, but objects to Plaintiffs' characterization of events and denies the rest.

1.3 Defendant admits to inviting a dancer to his home to model potential dance team outfits, but would like to note that invitation was rescinded. Defendant objects to Plaintiffs' characterization of events and denies the rest.

1.4 Defendant is without sufficient information to admit or deny the allegations, and therefore denies the same.

1.5 Defendant is without sufficient evidence to identify the protection order referred to and therefore denies the same; but objects to the characterization of events and denies the rest.

1.6 Defendant is without sufficient evidence to identify the court records referred to and therefore denies the same; objects to the characterization of events and denies the rest.

1.7 Defendant is without sufficient information to admit or deny the allegations and therefore denies the same. Defendant objects to the characterization of events offered by Plaintiffs.

1 1.8 Defendant is without sufficient information to admit or deny the allegations,
2 and therefore denies the same. Defendant objects to the characterization of events offered
3 by Plaintiffs.

4 1.9 Defendant is without sufficient information to admit or deny the allegations,
5 and therefore denies the same. Defendant objects to the characterization of events offered
6 by Plaintiffs.

7 2.1 Defendant is without sufficient information to admit or deny the allegations,
8 and therefore denies the same.

9 2.2 Admit

10 2.3 This paragraph offers legal conclusions to which the Defendant is not
11 required to respond; To the extent that a response is required, Defendant denies the
12 allegation.

13 2.4 This paragraph contains a legal conclusion, to which Defendant is not
14 required to respond; To the extent that a response is required, Defendant denies the
15 allegation.

16 2.5 This paragraph contains a legal conclusion, to which Defendant is not
17 required to respond; To the extent that a response is required, Defendant denies the
18 allegation.

19 3.1 Defendant is without sufficient information to admit or deny the allegations
20 and therefore denies the same.

21 3.2 Defendant is without sufficient information to admit or deny the allegations
22 and therefore denies the same.
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1 3.3 Defendant is without sufficient information to admit or deny the allegations
2 and therefore denies the same.

3 3.4 Defendant is without sufficient information to admit or deny the allegations
4 and therefore denies the same.

5 3.5 Defendant is without sufficient information to admit or deny the allegations
6 and therefore denies the same.

7 3.6 Defendant is without sufficient information to admit or deny the allegations
8 and therefore denies the same.

9 3.7 Admit that Defendant Seattle Impact FC is an organization operating under
10 the laws of Washington State and doing business in King County, and admits to the location
11 of its headquarters; This paragraph contains legal conclusions as to Defendant's status as an
12 employer and agent, and therefore Defendant is not required to respond; To the extent that a
13 response is required, Defendant denies the rest.

14 3.8 Defendant is without sufficient information to admit or deny the allegations
15 and therefore denies the same.

16 3.9 Defendant is without sufficient information to admit or deny the allegations
17 and therefore denies the same.

18 3.10 Admit that Defendant Earl resides in Kent, WA and is the owner and CEO
19 of Seattle Impact FC; Denies the rest; This paragraph contains legal conclusions and
20 therefore Defendant is not required to respond; To the extent that a response is required,
21 Defendant denies the rest.

22 4.1 Defendant objects to the Plaintiffs' characterization of the allegations;
23 Admits that Defendant Earl did contact Kevin Milliken about becoming an owner, put
24

1 himself the Owner, CEO, Coach and Player for Impact, included himself in marketing
2 materials, and that he did sign autographs with his number 11; denies the rest.

3 4.2 Defendant objects to the Plaintiffs' characterization of the allegation, denies
4 the same.

5 4.3 Defendant objects to the Plaintiffs' characterization of the allegation, denies
6 the same.

7 4.4 Defendant objects to the Plaintiffs' characterization of the allegation; admits
8 that Plaintiff David did her job as Director of Operations to have employees sign
9 employment agreements; denies the rest.

10 4.5 Defendant objects to the Plaintiffs' characterization of the allegation, denies
11 the same.

12 4.6 Defendant objects to the Plaintiffs' characterization of the allegation, denies
13 the same.

14 4.7 Defendant objects to the Plaintiffs' characterization of the allegation; admits
15 to appointing Lauren Baumann as the Director of the Dance Team; denies the rest.

16 4.8 Defendant objects to the Plaintiffs' characterization of the allegation, denies
17 the same.

18 4.9 Defendant objects to the Plaintiffs' characterization of the allegation; admits
19 to informing sponsors of the formation of a dance team; denies the rest.

20 4.10 Defendant objects to the Plaintiffs' characterization of the allegation; admits
21 to being involved in the selection of uniforms for the dance team, being in discussions with
22 "Stripper Boutique" and asking Plaintiff Baumann to come to a fitting, which was later
23 cancelled; denies the rest.
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1 4.11 Defendant objects to the Plaintiffs' characterization of the allegation; admits
2 to being present at and involved in the selection of dance team members; denies the rest.

3 4.12 Defendant objects to the Plaintiffs' characterization of the allegation; admits
4 to congratulating dance team members on their selections; denies the rest.

5 4.13 Defendant objects to the Plaintiffs' characterization of the allegation; admits
6 to speaking with Plaintiff Roberts about joining the dance team in August 2014; denies the
7 rest.

8 4.14 Defendant objects to the Plaintiffs' characterization of the allegation; admits
9 discussing a potential job opportunity; Defendant lacks information regarding Plaintiff's
10 mental state and therefore denies the same; denies the rest.

11 4.15 Defendant objects to the Plaintiffs' characterization of the allegation, denies
12 the same.

13 4.16 Defendant objects to the Plaintiffs' characterization of the allegation; admits
14 to hiring Plaintiff Roberts in a promotional role prior to officially hiring her as a dancer due
15 to timing constraints; denies the rest.

16 4.17 Defendant objects to the Plaintiffs' characterization of the allegation; admits
17 to contacting Plaintiff Roberts about that date to do promotional work; denies the rest.

18 4.18 Admit

19 4.19 Defendant objects to Plaintiffs' characterization of the allegation; admits to
20 splitting up to hand out flyers; denies the rest.

21 4.20 Defendant objects to the Plaintiffs' characterization of the allegation; admits
22 going to a strip club with Plaintiff Roberts and Mr. Gurson; denies the rest.

1 4.21 Defendant objects to the Plaintiffs’ characterization of the allegation, denies
2 the same.

3 4.22 Defendant objects to the Plaintiffs’ characterization of the allegation, denies
4 the same.

5 4.23 Defendant objects to the Plaintiffs’ characterization of the allegation;
6 Defendant is without sufficient information to admit or deny the allegations regarding
7 Plaintiff’s mental state and therefore denies the same; denies the rest.

8 4.24 Defendant objects to the Plaintiffs’ characterization of the allegation;
9 Defendant is without sufficient information to admit or deny the allegations regarding
10 Plaintiff’s mental state and therefore denies the same; denies the rest.

11 4.25 Defendant objects to the Plaintiffs’ characterization of the allegation;
12 Defendant is without sufficient information to admit or deny the allegations regarding
13 Plaintiff’s mental state and therefore denies the same; denies the rest.

14 4.26 Defendant objects to the Plaintiffs’ characterization of the allegation, denies
15 the same.

16 4.27 Defendant objects to the Plaintiffs’ characterization of the allegation, denies
17 the same.

18 4.28 Defendant is without sufficient information to admit or deny the allegations
19 and therefore denies the same.

20 4.29 Defendant objects to the Plaintiffs’ characterization of the allegation; admits
21 to speaking with Plaintiff Buslon about joining the dance team; denies the rest.

22 4.30 Defendant objects to the Plaintiffs’ characterization of the allegation; admits
23 to offering a position on the dance team; denies the rest.

1 4.31 Defendant objects to the Plaintiffs' characterization of the allegation; admits
2 to speaking with Plaintiff Buslon outside of normal work hours about the dance team;
3 denies the rest.

4 4.32 Defendant objects to the Plaintiffs' characterization of the allegation;
5 Defendant is without sufficient information to admit or deny the allegations and therefore
6 denies the same.

7 4.33 Defendant objects to the Plaintiffs' characterization of the allegation; admits
8 to being informed of the change in policy; denies the rest.

9 4.34 Defendant objects to the Plaintiffs' characterization of the allegation; admits
10 contacting Plaintiff Buslon about accompanying him along with another dance team
11 member to perform promotional work; Defendant is without sufficient information to admit
12 or deny the allegations regarding Plaintiff's mental state and therefore denies the same;
13 denies the rest.

14 4.35 Defendant objects to the Plaintiffs' characterization of the allegation; admits
15 to meeting with Plaintiff Buslon prior to a trip to Chicago; denies the rest.

16 4.36 Defendant objects to the Plaintiffs' characterization of the allegation; denies
17 the same.

18 4.37 Defendant objects to the Plaintiffs' characterization of the allegation;
19 Defendant is without sufficient information to admit or deny the allegations regarding the
20 steps Plaintiff took to ensure that she would not be alone, and therefore denies the same;
21 denies the rest.
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1 4.38 Defendant objects to the Plaintiffs' characterization of the allegation;
2 Defendant is without sufficient information to admit or deny the allegations regarding
3 Plaintiff's mental state and therefore denies the same; denies the rest.

4 4.39 Defendant objects to the Plaintiffs' characterization of the allegation; denies
5 the same.

6 4.40 Defendant objects to the Plaintiffs' characterization of the allegation; denies
7 the same.

8 4.41 Defendant objects to the Plaintiffs' characterization of the allegation; denies
9 the same.

10 4.42 Defendant objects to the Plaintiffs' characterization of the allegation; denies
11 the same.

12 4.43 Defendant objects to the Plaintiffs' characterization of the allegation; denies
13 the same.

14 4.44 Defendant objects to the Plaintiffs' characterization of the allegation; denies
15 the same.

16 4.45 Defendant objects to the Plaintiffs' characterization of the allegation; denies
17 the same.

18 4.46 Defendant objects to the Plaintiffs' characterization of the allegation; denies
19 the same.

20 4.47 Defendant objects to the Plaintiffs' characterization of the allegation; denies
21 the same.

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1 4.48 Defendant objects to the Plaintiffs’ characterization of the allegation;
2 Defendant is without sufficient information to admit or deny the allegations and therefore
3 denies the same.

4 4.49 Defendant objects to the Plaintiffs’ characterization of the allegation;
5 Defendant is without sufficient information to admit or deny the allegations and therefore
6 denies the same
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8 4.50 Defendant objects to the Plaintiffs’ characterization of the allegation; admits
9 a temporary protection order was entered against Earl – the court documents speak for
10 themselves.

11 4.51 Defendant objects to the Plaintiffs’ characterization of the allegation; admits
12 that a permanent protection order was entered against Earl – the court documents speak for
13 themselves.
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15 4.52 Defendant objects to the Plaintiffs’ characterization of the allegation;
16 Defendant is without sufficient information to admit or deny the allegations and therefore
17 denies the same.

18 4.53 Defendant objects to the Plaintiffs’ characterization of the allegation;
19 Defendant is without sufficient information to admit or deny the allegations and therefore
20 denies the same.
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22 4.54 Defendant objects to the Plaintiffs’ characterization of the allegation;
23 Defendant is without sufficient information to admit or deny the allegations and therefore
24 denies the same.
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1 4.55 Defendant objects to the Plaintiffs' characterization of the allegation;
2 Defendant is without sufficient information to admit or deny the allegations and therefore
3 denies the same.

4 4.56 Defendant objects to the Plaintiffs' characterization of the allegation;
5 Defendant is without sufficient information to admit or deny the allegations and therefore
6 denies the same.

7 4.57 Admit

8 4.58 Defendant objects to the Plaintiffs' characterization of the allegation; admits
9 to being informed of the dance team's resignation, refusing to accept said resignations, and
10 terminating the dance team; denies the rest.

11 4.59 Defendant objects to the Plaintiffs' characterization of the allegation; admits
12 instructing Plaintiff David to send a cease and desist letter; denies the rest.

13 4.60 Defendant objects to the Plaintiffs' characterization of the allegation; admits
14 to statements made in his sworn statement; denies the rest.

15 4.61 Admit

16 4.62 Defendant objects to the Plaintiffs' characterization of the allegation; admits
17 to expanding Plaintiff David's role; denies the rest.

18 4.63 Admit

19 4.64 Defendant objects to the Plaintiffs' characterization of the allegation; admits
20 to promoting Plaintiff David; denies the rest.

21 4.65 Defendant objects to the Plaintiffs' characterization of the allegation; admits
22 to hiring Plaintiff David and his job functions; denies the rest.

23 4.66 Admit

1 4.67 Defendant objects to the Plaintiffs' characterization of the allegation;
2 Defendant is without sufficient information to admit or deny the allegations and therefore
3 denies the same.

4 4.68 Defendant objects to the Plaintiffs' characterization of the allegation; admits
5 that Defendant David processed the termination of each dance team member; Defendant is
6 without sufficient information to admit or deny the remaining allegations and therefore
7 denies the rest.

9 4.69 Defendant objects to the Plaintiffs' characterization of the allegation; admits
10 calling Defendant Esquibel to discuss her employment; denies the rest.

11 4.70 Defendant objects to the Plaintiffs' characterization of the allegation; admits
12 directing Plaintiff David to terminate Plaintiff Esquibel's employment; denies the rest.

13 4.71 Defendant objects to the Plaintiffs' characterization of the allegation; admits
14 to receiving Plaintiff David's resignation; Defendant is without sufficient information to
15 admit or deny the reasons for Plaintiff David's resignation and therefore denies the same.

16 4.72 Defendant objects to the Plaintiffs' characterization of the allegation;
17 Defendant is without sufficient information to admit or deny Plaintiff's mental state and
18 therefore denies the same; denies the rest.

19 4.73 Defendant objects to the Plaintiffs' characterization of the allegation; admits
20 terminating Plaintiff David's employment; denies the rest.

21 4.74 Defendant objects to the Plaintiffs' characterization of the allegation;
22 Defendant is without sufficient information to admit or deny allegation and therefore denies
23 the same.

24 4.75 Admit
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1 4.76 Defendant objects to the Plaintiffs' characterization of the allegation; admit.

2 4.77 Defendant objects to the Plaintiffs' characterization of the allegation;
3 Defendant admits to being terminated from his coaching position in 1998; denies the rest.

4 4.78 Defendant admits to receiving a letter prior to his termination – the
5 document speaks for itself.

6 4.79 Defendant objects to the Plaintiffs' characterization of the allegation; admits
7 to being featured in the referenced Seattle Times Report – the report speaks for itself.

8 4.80 Defendant objects to the Plaintiffs' characterization of the allegation; admits
9 to owning and operating youth soccer camps; lacks information to admit or deny what is
10 contained in the court documents and denies the same – the documents will speak for
11 themselves; denies the rest.

12 4.81 Defendant objects to the Plaintiffs' characterization of the allegation; admits
13 to being involved in various court cases; denies the rest.

14 4.82 Admit

15 4.83 Admit

16 4.84 Admit

17 4.85 Admit

18 4.86 Admit

19 4.87 Admit

20 4.88 Admit

21 4.89 Admit

22 4.90 Defendant objects to the Plaintiffs' characterization of the allegation; admits
23 to taking reasonable measure to fight legal actions commenced against him; denies the rest.
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1 4.91 Defendant objects to the Plaintiffs' characterization of the allegation;
2 Defendant is without sufficient information to admit or deny allegation and therefore denies
3 the same.

4 4.92 Defendant objects to the Plaintiffs' characterization of the allegation;
5 Defendant is without sufficient information to admit or deny allegation and therefore denies
6 the same.

7 4.93 Defendant objects to the Plaintiffs' characterization of the allegation;
8 Defendant is without sufficient information to admit or deny allegation and therefore denies
9 the same.

10 4.94 Defendant objects to the Plaintiffs' characterization of the allegation;
11 Defendant is without sufficient information to admit or deny allegation and therefore denies
12 the same.

13 4.95 Defendant objects to the Plaintiffs' characterization of the allegation;
14 Defendant is without sufficient information to admit or deny allegation and therefore denies
15 the same.

16 4.96 Defendant objects to the Plaintiffs' characterization of the allegation;
17 Defendant is without sufficient information to admit or deny allegation and therefore denies
18 the same.

19 4.97 Defendant is without sufficient information to admit or deny allegation and
20 therefore denies the same.

21 4.98 Defendant is without sufficient information to admit or deny allegation and
22 therefore denies the same.

1 4.99 Defendant objects to the Plaintiffs' characterization of the allegation and
2 therefore denies the same.

3 4.100 Defendant admits to becoming owner of the Seattle Impact FC; This
4 paragraph makes a legal conclusion and Defendant is not required to respond.
5

6 4.101 Defendant objects to the Plaintiffs' characterization of the allegation;
7 Defendant is without sufficient information to admit or deny allegation and therefore denies
8 the same.

9 4.102 Defendant objects to the Plaintiffs' characterization of the allegation;
10 Defendant is without sufficient information to admit or deny allegation and therefore denies
11 the same.

12 4.103 Defendant objects to the Plaintiffs' characterization of the allegation;
13 Defendant is without sufficient information to admit or deny allegation and therefore denies
14 the same.
15

16 4.104 Defendant objects to the Plaintiffs' characterization of the allegation;
17 Defendant is without sufficient information to admit or deny allegation and therefore denies
18 the same.

19 4.105 Defendant objects to the Plaintiffs' characterization of the allegation; admits
20 to requiring the dance team members sign employment contracts; denies the rest.
21

22 4.106 Admit

23 4.107 Defendant objects to the Plaintiffs' characterization of the allegation and
24 therefore denies the same.
25
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1 4.108 Defendant objects to the Plaintiffs' characterization of the allegation;
2 Defendant is without sufficient information to admit or deny allegations and therefore
3 denies the same.

4 4.109 Defendant objects to the Plaintiffs' characterization of the allegation; admits
5 to having unpaid wages for Plaintiff David; denies the rest.
6

7 4.110 Defendant objects to the Plaintiffs' characterization of the allegation; admits
8 to having unpaid wages for Plaintiffs David and Esquibel; denies the rest.

9 5.1 Defendants reallege paragraphs 1.1 through 4.110 of this answer and
10 incorporate the same by reference.

11 5.2 This paragraph offers legal conclusions to which the Defendant is not
12 required to respond; To the extent that a response is required, Defendant objects to the
13 characterization of the allegation and denies the same.
14

15 5.3 This paragraph offers legal conclusions to which the Defendant is not
16 required to respond; To the extent that a response is required, Defendant objects to the
17 characterization of the allegation and denies the same.

18 5.4 This paragraph offers legal conclusions to which the Defendant is not
19 required to respond; To the extent that a response is required, Defendant objects to the
20 characterization of the allegation and denies the same.
21

22 5.5 This paragraph offers legal conclusions to which the Defendant is not
23 required to respond; To the extent that a response is required, Defendant objects to the
24 characterization of the allegation and denies the same.

25 6.1 Defendants reallege paragraphs 1.1 through 5.5 of this answer and
26 incorporate the same by reference.

1 6.2 Defendant objects to the characterization of the allegations; Defendant lacks
2 information regarding this allegation and denies the same.

3 6.3 This paragraph makes a legal assertion to which the Defendant is not
4 required to respond; Defendant objects to the characterization of the allegations; Defendant
5 lacks information regarding the Plaintiffs' mental states and denies the same; denies the
6 rest.

7
8 6.4 This paragraph offers legal conclusions to which the Defendant is not
9 required to respond; To the extent that a response is required, Defendant objects to the
10 characterization of the allegation and denies the same.

11 6.5 Defendant objects to the characterization of this allegation and denies the
12 same as it pertains to Seattle Impact FC; Defendants lack information to admit or deny the
13 allegation as it pertains to MASL and therefore denies the same.

14
15 6.6 This paragraph offers legal conclusions to which the Defendant is not
16 required to respond; To the extent that a response is required, Defendant objects to the
17 characterization of the allegation and denies the same; Defendant lacks information to
18 admit or deny the allegations as they pertain to MASL and therefore denies the same.

19 7.1 Defendants reallege paragraphs 1.1 through 6.6 of the Answer and hereby
20 incorporate the same by reference.

21 7.2 This paragraph offers legal conclusions to which the Defendant is not
22 required to respond; To the extent that a response is required, Defendant objects to the
23 characterization of the allegation and denies the same.
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1 7.3 This paragraph offers legal conclusions to which the Defendant is not
2 required to respond; To the extent that a response is required, Defendant objects to the
3 characterization of the allegation and denies the same.

4 7.4 This paragraph offers legal conclusions to which the Defendant is not
5 required to respond; To the extent that a response is required, Defendant objects to the
6 characterization of the allegation and denies the same.

7 8.1 Defendants reallege paragraphs 1.1 through 7.4 of the Answer and hereby
8 incorporate the same by reference.

9 8.2 This paragraph offers legal conclusions to which the Defendant is not
10 required to respond; To the extent that a response is required, Defendant objects to the
11 characterization of the allegation and denies the same.

12 8.3 This paragraph offers legal conclusions to which the Defendant is not
13 required to respond; To the extent that a response is required, Defendant objects to the
14 characterization of the allegation and denies the same.

15 8.4 This paragraph offers legal conclusions to which the Defendant is not
16 required to respond; To the extent that a response is required, Defendant objects to the
17 characterization of the allegation and denies the same.

18 9.1 Defendants reallege paragraphs 1.1 through 8.4 of the Answer and hereby
19 incorporate the same by reference.

20 9.2 This paragraph offers legal conclusions to which the Defendant is not
21 required to respond; To the extent that a response is required, Defendant objects to the
22 characterization of the allegation and denies the same.

1 9.3 This paragraph offers legal conclusions to which the Defendant is not
2 required to respond; To the extent that a response is required, Defendant objects to the
3 characterization of the allegation and denies the same.

4 10.1 Defendants reallege paragraphs 1.1 through 9.3 of the Answer and hereby
5 incorporate the same by reference.

6 10.2 This paragraph offers legal conclusions to which the Defendant is not
7 required to respond; To the extent that a response is required, Defendant objects to the
8 characterization of the allegation and denies the same.

9 10.3 This paragraph offers legal conclusions to which the Defendant is not
10 required to respond; To the extent that a response is required, Defendant objects to the
11 characterization of the allegation and denies the same.

12 10.4 This paragraph offers legal conclusions to which the Defendant is not
13 required to respond; To the extent that a response is required, Defendant objects to the
14 characterization of the allegation and denies the same.

15 11.1 Defendants reallege paragraphs 1.1 through 10.4 of the Answer and hereby
16 incorporate the same by reference

17 11.2 This paragraph offers legal conclusions to which the Defendant is not
18 required to respond; To the extent that a response is required, Defendant objects to the
19 characterization of the allegation and denies the same.

20 11.3 This paragraph offers legal conclusions to which the Defendant is not
21 required to respond; To the extent that a response is required, Defendant objects to the
22 characterization of the allegation and denies the same.

1 12.1 Defendants reallege paragraphs 1.1 through 11.3 of the Answer and hereby
2 incorporate the same by reference.

3 12.2 This paragraph offers legal conclusions to which the Defendant is not
4 required to respond; To the extent that a response is required, Defendant objects to the
5 characterization of the allegation and denies the same.
6

7 12.3 This paragraph offers legal conclusions to which the Defendant is not
8 required to respond; To the extent that a response is required, Defendant objects to the
9 characterization of the allegation and denies the same.

10 13.1 Defendants reallege paragraphs 1.1 through 12.3 of the Answer and hereby
11 incorporate the same by reference.

12 13.2 This paragraph offers legal conclusions to which the Defendant is not
13 required to respond; To the extent that a response is required, Defendant objects to the
14 characterization of the allegation and denies the same.
15

16 13.3 This paragraph offers legal conclusions to which the Defendant is not
17 required to respond; To the extent that a response is required, Defendant objects to the
18 characterization of the allegation and denies the same.

19 13.4 This paragraph offers legal conclusions to which the Defendant is not
20 required to respond; To the extent that a response is required, Defendant objects to the
21 characterization of the allegation and denies the same.
22

23 14.1 Defendants reallege paragraphs 1.1 through 13.4 of the Answer and hereby
24 incorporate the same by reference.
25
26

1 14.2 This paragraph offers legal conclusions to which the Defendant is not
2 required to respond; To the extent that a response is required, Defendant objects to the
3 characterization of the allegation and denies the same.

4 14.3 This paragraph offers legal conclusions to which the Defendant is not
5 required to respond; To the extent that a response is required, Defendant objects to the
6 characterization of the allegation and denies the same.

7 15.1 Defendants reallege paragraphs 1.1 through 14.3 of the Answer and hereby
8 incorporate the same by reference.

9 15.2 This paragraph offers legal conclusions to which the Defendant is not
10 required to respond; To the extent that a response is required, Defendants lack information
11 to affirm or deny the allegations and therefore deny the same.
12

13 15.3 This paragraph offers legal conclusions to which the Defendant is not
14 required to respond; To the extent that a response is required, Defendants lack information
15 to affirm or deny the allegations and therefore deny the same.
16

17 15.4 This paragraph offers legal conclusions to which the Defendant is not
18 required to respond; To the extent that a response is required, Defendants lack information
19 to affirm or deny the allegations and therefore deny the same.
20

21 15.5 This paragraph offers legal conclusions to which the Defendant is not
22 required to respond; To the extent that a response is required, Defendants lack information
23 to affirm or deny the allegations and therefore deny the same.

24 15.6 This paragraph offers legal conclusions to which the Defendant is not
25 required to respond; To the extent that a response is required, Defendants lack information
26 to affirm or deny the allegations and therefore deny the same.

- 1 Q. Sole negligence of co-defendant
- 2 R. Offset
- 3 S. Failure to exhaust administrative remedies
- 4 T. Necessity
- 5 U. Parol evidence rule
- 6 V. Unjust enrichment
- 7 W. Unrelated to defendant's conduct
- 8 X. Lack of causal relationship
- 9 Y. Acquiescence
- 10 Z. Good faith
- 11 AA. At-will employment
- 12 BB. Breach of contract
- 13 CC. Cancellation of contract/resignation
- 14 DD. Business judgment rule

17 **III. RELIEF REQUESTED**

18 WHEREFORE, Defendants pray for relief as follows:

- 19 A. An order dismissing Plaintiffs' lawsuit without prejudice;
- 20 B. Reasonable attorney's fees and costs; and
- 21 C. Whatever further and additional relief the court shall deem just and equitable

22 DATED: December 5, 2014

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24
25 /s/ Ross D. Gardner
26 Ross D. Gardner, WSBA #46232
RossGardner.ESQ@gmail.com

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community of Dion and Laurel Earl*