

## **BANKSTON & ASSOCIATES** A LIMITED LIABILITY COMPANY ATTORNEYS AT LAW

Larry S. Bankston Jenna H. Linn

jlinn@bblawyers.net

April 24, 2014

Clerk of Court 19<sup>th</sup> JDC, Parish of East Baton Rouge P.O. Box 1991 Baton Rouge, LA 70821

ATTN: CIVIL SUITS

RE:

Robert Burns and Rev. Freddie Phillips vs. LA Auctioneer's Licensing Board, et al Docket No.: 619,707; Section 27; 19<sup>th</sup> Judicial District Court

My File No.: 1107-0004

Dear Sir/Madam:

Enclosed please find the original and one (1) copy of defendant, Louisiana Auctioneer's Licensing Board, et al, Answer to Amendment to Pleadings. Please file the original into the suit record, and return a conformed copy to our office in the enclosed self-addressed, stamped envelope.

Please note that defendant, Louisiana Auctioneer's Licensing Board, is exempt from filing fees pursuant to La. R.S. 13:4521.

Thank you for your attention to this matter and should you have any questions or comments, please do not hesitate to contact our office.

Sincerely,

BANKSTON & ASSOCIATES, L.L.C.

Jenna/H. Linn

JHL: sms

Enclosure: Answer/envelope

Honorable Todd Hernandez (via facsimile no. 389-8941)

Robert Burns (via email only)

Rev. Freddie Phillips (via email only)

Client (via email only)



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BANKSTON & ASSOCIATES, L.L.C.

or, Answerienvelope
Anomable Todd Hernandez (yta facsimile no. 389-394))
Robert Burna (yta enzal only)
Rev. Freddic Phillips (yia enzal only)
Client (yia enzal only)

8708 Jefferson Highway, Suite A - Baton Rouge, LA 70808 Telephone (225) 786-3800 - Facsimile (225) 786-7800

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Date/Time: Apr. 25. 2014 11:54AM

1) BANKSTON & ASSOC

\* \* \* Communication Result Report ( Apr. 25. 2014 11:56AM ) \* \* \*

P. 1

Page

ROBERT BURNS AND REV. FREDDIE LEE PHILLIPS \* NUMBER 619707 SECTION 27

**VERSUS** 

\* 19TH JUDICIAL DISTRICT COURT

LOUISIANA AUCTIONEER'S LICENSING BOARD, JAMES M. SIMS, TESSA STEINKAMP GREGORY L. "GREG" BORDELON,

\* PARISH OF EAST BATON ROUGE

\* STATE OF LOUISIANA

## **DEFENDANTS' ANSWER TO AMENDMENT TO PLEADINGS**

NOW INTO COURT, through undersigned counsel, come Louisiana Auctioneer's Licensing Board, James M. Sims, Tessa Steinkamp, and Gregory L. Bordelon, who in response to Plaintiffs, Robert Burns and Freddie Phillips' *Amendment to Pleadings*, respectfully respond as follows:

1.

Paragraph 1 of Plaintiffs' Amendment to Pleadings does not require a response from Defendants; however, to the extent an answer is required by this Court, Defendants deny the allegations of Paragraph 1 for lack of sufficient information to justify a belief in the truth therein.

2.

The allegations of Paragraph 2 are admitted.

3.

Defendants admit that LALB had a regularly scheduled meeting on January 8, 2013.

4.

Defendants admit that an agenda for such meeting is in writing. Such writing is the best evidence of the contents therein. All other allegations contained in Paragraph 4 are denied for lack of sufficient information to justify a belief in the truth therein.

5.

The allegations of Paragraph 5 are denied for lack of sufficient information to justify a belief in the truth therein.

6.

The allegations of Paragraph 6 are denied for lack of sufficient information to justify a belief in the truth therein.

7.

The allegations of Paragraph 7 are denied for lack of sufficient information to justify a belief in the truth therein.

The allegations of Paragraph 8 are denied for lack of sufficient information to justify a belief in the truth therein.

9.

The allegations of Paragraph 9 are denied for lack of sufficient information to justify a belief in the truth therein.

10.

The allegations of Paragraph 10 are denied for lack of sufficient information to justify a belief in the truth therein.

11.

The allegations of Paragraph 6 are denied for lack of sufficient information to justify a belief in the truth therein.

12.

The allegations of Paragraph 12 are denied for lack of sufficient information to justify a belief in the truth therein.

13.

The allegations of Paragraph 13 are denied for lack of sufficient information to justify a belief in the truth therein.

14.

The allegations of Paragraph 6 are denied for lack of sufficient information to justify a belief in the truth therein.

15.

The allegations of Paragraph 15 are denied for lack of sufficient information to justify a belief in the truth therein.

16.

Defendants admit that a letter was sent from Mr. Bankston to the Governor's office. Such letter is in writing and is the best evidence of its contents. All other allegations of Paragraph 16 are denied for lack of sufficient information to justify a belief in the truth therein.

17.

The allegations of Paragraph 17 are denied for lack of sufficient information to justify a belief in the truth therein.

18.

The allegations of Paragraph 18 are denied for lack of sufficient information to justify a belief in the truth therein.

19.

The allegations of Paragraph 19 are denied for lack of sufficient information to justify a belief in the truth therein.

20.

The allegations of Paragraph 20 are denied.

21.

The allegations of Paragraph 21 are denied.

22.

The allegations of Paragraph 22 are denied for lack of sufficient information to justify a belief in the truth therein.

23.

The allegations of Paragraph 23 are denied for lack of sufficient information to justify a belief in the truth therein.

24.

The allegations of Paragraph 24 are denied.

WHEREFORE, Louisiana Auctioneer's Licensing Board, James M. Sims, Tessa Steinkamp, and Gregory L. Bordelon pray that their answer be deemed good and sufficient, and after all legal delays and proceedings had, that there be judgment in favor of the Defendants and against Plaintiffs, dismissing Plaintiffs' suit and demands of the Plaintiffs at the Plaintiffs' cost., and for all other just and equitable relief.

Respectfully submitted:

Bankston & Associates, L.L.C.

8708 Jefferson Hwy, Suite A Baton Rouge, LA 70809

Telephone No.: (225) 766-3800

Fax: (225) 766-7800

Larry S Bankston, Bar Roll # 02744

Jenna H. Linn, Bar Roll # 33246

## **CERTIFICATE**

I hereby certify on this April, 2014, a copy of the foregoing pleading was served on Robert Burns, by transmitting a copy of same via electronic mail, facsimile or regular United States mail, properly addressed, and first class postage prepaid.

/

Tenna H. Linn