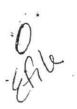
Fulton County Superior Court

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Date: 2/13/2017 4:27:25 PM

Cathelene Robinson, Clerk



IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

ANGEL CHARLENE GARRON,)	*,. *
Plaintiff,)	κ.
)	CW IV 4 CW 63.7
VS.)	CIVIL ACTION
)	FILE NO. 2016-CV-283902
SOUTHEAST MORTGAGE OF GEORGIA, INC.,)	
LOANCARE LLC AND STEARNS LENDING LLC,)	
LAKE VIEW LOAN SERVICE AND EVERBANK,)	
MORTGAGE ELECTION REGISTRATION)	
SYSTEM, AND ALL THE WORLD)	
Defendants.)	

ANSWER AND AFFIRMATIVE DEFENSES OF DEFENDANT SOUTHEAST MORTGAGE OF GEORGIA, INC.

COME NOW the Defendant, Southeast Mortgage of Georgia, Inc., a Georgia corporation ("SEMG"), by and through its counsel, and files this Answer and Affirmative Defenses in response to Plaintiff's Amended Action to Quiet Title et al. ("Plaintiff"s Action").

FIRST AFFIRMATIVE DEFENSE

Plaintiff's complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of waiver.

THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by a partial or total failure of consideration.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred since any damages which may have been suffered by Plaintiff were not caused by the actions of Defendant SEMG.

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 8 and all allegations of that paragraph are denied.

9

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 9 and all allegations of that paragraph are denied.

10.

Defendant admits that Plaintiff entered into a transaction with D.R. Horton to purchase the Subject Property identified therein, but denies that Defendant was a party to that transaction.

11.

Defendant admits each of the allegations contained in paragraph 11.

12.

Defendant denies each of the allegations contained in paragraph 12.

13.

Defendant admits each of the allegations contained in paragraph 13.

14.

Defendant admits each of the allegations contained in paragraph 14.

15.

Defendant admits each of the allegations contained in paragraph 15.

16.

Defendant denies each of the allegations contained in paragraph 16.

Fulton County Superior Court

EFILEDTMM

Date: 10/2/2017 8:08 AM

Cathelene Robinson, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

ANGEL CHARLENE GARRON,)
Plaintiff,	
vs.) Civil Action) File No. 2017CV295182
SOUTHEAST MORTGAGE OF GEORGIA, INC.,) File No. 2017C V295182
LOANCARE LLC AND STEARNS LENDING LLC,	j
LAKE VIEW LOAN SERVICE AND EVERBANK,)
AND ALL THE WORLD)
Defendants.)

ANSWER AND AFFIRMATIVE DEFENSES OF DEFENDANT SOUTHEAST MORTGAGE OF GEORGIA, INC.

COME NOW the Defendant, Southeast Mortgage of Georgia, Inc., a Georgia corporation ("Defendant"), by and through its counsel, and files this Answer and Affirmative Defenses in response to Plaintiff's Complaint.

FIRST AFFIRMATIVE DEFENSE

Plaintiff's complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of waiver.

THIRD AFFIRMATIVE DEFENSE

By way of further defense, Defendant responds to each of the numbered paragraphs in Plaintiff's Acton and shows this Court as follows:

1.

Defendant admits the allegations contained in paragraph 1 of the Complaint.

2.

Defendant admits the allegations contained in paragraph 2 of the Complaint.

3.

Defendant admits the allegations contained in paragraph 3 of the Complaint.

4.

Defendant admits the allegations contained in paragraph 4 of the Complaint.

5.

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 5 and all allegations of that paragraph are denied.

6.

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 6 and all allegations of that paragraph are denied.

7

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 7 and all allegations of that paragraph are denied.

8.

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 8 and all allegations of that paragraph are denied.

9.

Defendant does not have information sufficient to admit or deny the allegations contained in paragraph 9 and all allegations of that paragraph are denied.

10.

Defendant admits that Plaintiff entered into a transaction with D.R. Horton to purchase the Subject Property identified therein, but denies that Defendant was a party to that transaction.