

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FILED

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

JAMES D. SILVER, not individually,
but solely in his capacity as Receiver
for NEXSTAR COMMUNICATIONS,
LLC; TMT EQUIPMENT COMPANY, LLC;
TMT MANAGEMENT GROUP, LLC;
POSA, LLC; POSA TMT, LLC; TELEVEST
COMMUNICATIONS, LLC; TELEVEST
GROUP, LLC; and SPIN DRIFT, LLC.

Plaintiff

Case No. 6:06-cv-290-Orl-PCF-DAB

v.

EDWARD S. DIGGES, JR., an
individual; KATHERINE KERR, an
individual; KBK PARTNERSHIP, LLP,
a/k/a KBK, a foreign limited liability
partnership; LOUIS CHRISTIAN
HAUG, an individual; K. BRIGID
PETERSON, f/k/a K. BRIGID
MCGONNIGAL, an individual, J.
BRUCE MCGONNIGAL, an individual;
K. BRETT MCGONNIGAL, an individual;
RICHARD F. MCGONNIGAL, an individual;
and CHILHAM, LLC, a foreign limited
liability company.

Defendants

ANSWER TO AMENDED COMPLAINT

Pursuant to Rule 12(b), Fed. R. Civ. P., Defendant, Louis Christian Haug, in proper
person, responds to the Amended Complaint filed by the Plaintiff, and states:

GENERAL DENIAL OF LIABILITY

The Defendant generally denies the allegations in the Amended Complaint and

demands strict proof thereof.

NEGATIVE DEFENSES

1. The Plaintiff lacks the capacity to sue.
2. The Plaintiff lacks the authority to sue in a representative capacity.
3. The claims are barred as the Plaintiff failed to mitigate its alleged damages and/or properly cure any alleged defects.

4. The Plaintiff had no legal existence at the time of the wrongs alleged.
5. The Plaintiff has no legal existence.

AFFIRMATIVE DEFENSES

1. The claims asserted are barred by the applicable statute of limitations.
2. The claims asserted are barred by the statute of frauds.
3. The claims asserted are barred by the doctrine of estoppel.
4. The claims asserted are barred by the doctrine of contributory negligence.
5. The claims asserted are barred by the doctrine of assumption of risk.
6. The claims asserted are barred by the doctrine of unclean hands.
7. The claims asserted are barred by the doctrine of collateral estoppel.
8. The claims asserted are barred by the doctrine of promissory estoppel.
9. The claims asserted are barred by the doctrine of waiver.
10. The claims asserted are barred by the doctrine of accord and satisfaction.
11. The claims asserted are barred by the doctrine of illegality.
12. The claims asserted are barred by the doctrine of ultra vires.
13. The action is barred by the doctrine of fraud.
14. The action is barred by the doctrine of release.

15. The action is barred by the doctrine of payment.

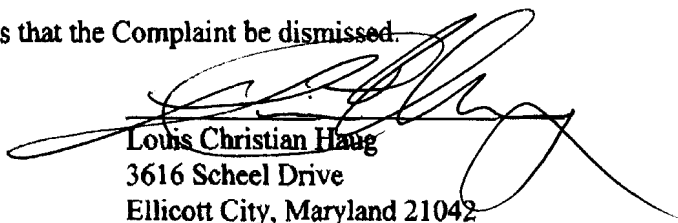
ENUMERATED DEFENSES

- 1. The Complaint fails to assert subject matter jurisdiction over the matter.
- 2. The Complaint fails to assert personal jurisdiction over the defendant.
- 3. The Complaint is barred because of improper venue.
- 4. The Complaint is barred because of insufficient process.
- 5. The Complaint is barred because of insufficient service of process.
- 6. The Complaint fails to state a claim upon which relief can be granted.
- 7. The Complaint fails to join a Party under Rule 19.

OTHER DEFENSES

Defendant admits the allegation contained in paragraph 1; denies the allegations in paragraph 14, in part, specifically, wherein the Plaintiff alleges that “[H]aug either participated in or had knowledge of or reasonably should have known of the fraud described herein, although the full extent of the financial benefit to Haug is not yet fully known. In any event, Haug aided and abetted the fraud described herein.”; and further denies the allegations in paragraph 31(i), and alleges that he is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in each and every other paragraph of the complaint.

WHEREFORE, having fully responded to the Amended Complaint filed by the Plaintiff, the Defendant respectfully requests that the Complaint be dismissed.

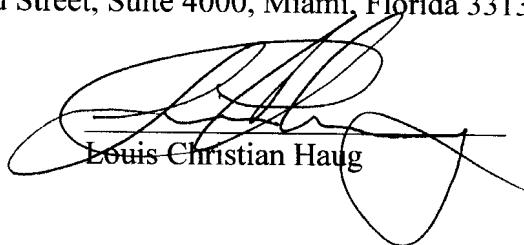


Louis Christian Haug
 3616 Scheel Drive
 Ellicott City, Maryland 21042
 (410) 531-3028

In Proper Person

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of May, 2006, a copy of the foregoing Answer to Amended Complaint was mailed, first class, postage prepaid, to David James Smith, Esquire, counsel for the Plaintiff, at Carlton Fields, P.A., Bank of America Tower at International Place, 100 S.E. Second Street, Suite 4000, Miami, Florida 33131.


Louis Christian Haug