

NORTH CAROLINA
GUILFORD COUNTY
ROCKINGHAM CO., C.S.C.

FILED

2005 OCT -3 AM 11:02

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
05 CVS 999

NANCY E. ODELL, Individually and on
behalf of those similarly situated

Plaintiff,

v.

LEGAL BUCKS, LLC,
J. KEITH TART,
LYNN D. TART,

Defendants.

**REPLY to AMENDED
COUNTERCLAIM**

Plaintiff, replying to Defendants' counterclaim, says:

1. As to the allegations in paragraph 1 of the counterclaim, the document speaks for itself. Plaintiff denies she has breached the agreement and denies that the agreement is legal and enforceable.
2. As to the allegations in paragraph 2 of the counterclaim, the document speaks for itself. Plaintiff denies she has breached the agreement and denies that the agreement is legal and enforceable.
3. The allegations in paragraph 3 are denied.
4. The allegations in paragraph 4 are denied..
5. The allegations in paragraph 5 are denied.
6. The allegations in paragraph 6 are denied.
7. The allegations in paragraph 7 are denied.
8. Plaintiff's responses to the preceding paragraphs are incorporated herein by

Cml
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reference.

9. The allegations in paragraph 9 are denied.

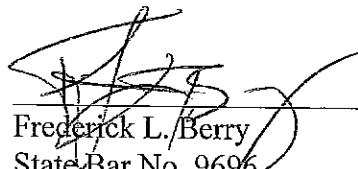
Affirmative Defenses

1. Plaintiff pleads the allegations in the complaint as affirmative defenses against the Defendants' counterclaims.
2. Defendants' counterclaims are barred by the doctrine of unclean hands.
3. Defendants' counterclaims are barred by the doctrine of estoppel.
4. Defendants' counterclaims are barred because the contract between the parties is illegal.
5. Defendants' counterclaims are barred because the contract constitutes usury.

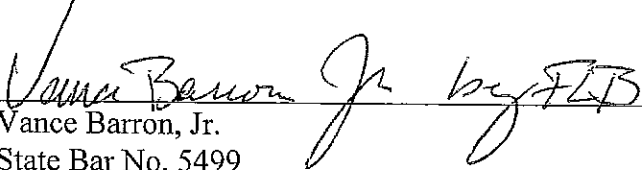
WHEREFORE, plaintiff prays that :

1. Defendant's counterclaim be dismissed.
2. That the court grant the relief requested in the complaint.
3. That a jury determine the issues of fact in this case.
4. That the court grant such other relief as it deems appropriate.

This the 5 day of September, 2005.

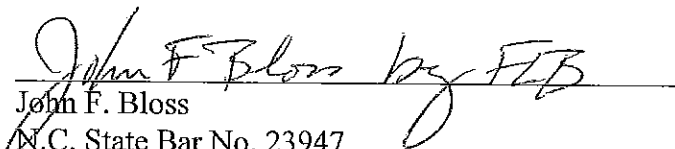


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CERTIFICATE OF SERVICE

FILED

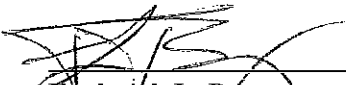
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ROCKINGHAM CO., C.S.C.

I hereby certify that I served the foregoing *Reply to Amended Counterclaim* upon the defendants in this action by mailing a copy thereof to their attorney by first-class mail, postage prepaid, addressed as follows:

Hada V. Haulsee, Esq.
Womble Carlyle Sandridge & Rice, PLLC
One West Fourth Street
Winston-Salem, North Carolina 27101

This the 30 day of ~~July~~^{September}, 2005.



Frederick L. Berry
State Bar No. 9696
Attorney for Plaintiff