

**IN THE CIRCUIT COURT OF THE  
SIXTEEN JUDICIAL CIRCUIT IN AND  
FOR MONROE COUNTY**

**THOMAS F. COLLINS, et al.,**

**Plaintiffs,**

**vs.**

**MONROE COUNTY,**

**Defendant,**

**vs.**

**STATE OF FLORIDA,**

**Third Party Defendant**

**CASE NO. CA-M-04-379**

**THIRD PARTY DEFENDANT'S ANSWER AND AFFIRMATIVE  
DEFENSES TO PLAINTIFFS' COMPLAINT**

Third Party Defendant, the State of Florida, hereby answers Plaintiffs' Complaint as

follows:

1. Admit
2. Admit
3. Deny
4. Without knowledge
5. Without knowledge
6. Admit the first sentence; deny all other allegations
7. Without knowledge
8. Without knowledge
9. Without knowledge
10. Without knowledge
11. Without knowledge
12. Without knowledge
13. Without knowledge
14. Without knowledge

15. Without knowledge
16. Without knowledge
17. Without knowledge
18. Without knowledge
19. Without knowledge
20. Without knowledge
21. Without knowledge
22. Without knowledge
23. Without knowledge
24. Without knowledge
25. Without knowledge
26. Without knowledge
27. Without knowledge
28. Without knowledge
29. Without knowledge
30. Deny
31. Deny
32. Without knowledge
33. Deny
34. Adopt previous answers
35. This paragraph is a statement of Plaintiffs' understanding of the law and it

requires no answer. To the extent an answer is required - deny

36. Without knowledge
37. Without knowledge
38. Deny
39. Deny
40. Deny

41. Deny

42. This paragraph is a statement of Plaintiffs' understanding of the law and it requires no answer. To the extent an answer is required - deny

43. Deny

44. Adopt previous answers

45. Deny

46. Adopt previous answers

47. Deny

48. Without knowledge

49. Deny

50. Deny

#### **AFFIRMATIVE DEFENSES**

1. Plaintiffs' claims are barred by the applicable statute of limitations.

2. Plaintiffs' claims are not ripe.

Respectfully submitted this 19<sup>th</sup> Day of July 2005.

CHARLES J. CRIST, Jr.  
ATTORNEY GENERAL

/s/

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served by U.S.

Mail this 19<sup>th</sup> Day of July, 2005, on:

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\_\_\_\_\_  
/s/  
Attorney