

NOV 25 2020

IN THE CHANCERY COURT OF COFFEE COUNTY TENNESSEE

TIME 08:00 AM/PM

COFFEE COUNTY, a Political)
Subdivision of the State of Tennessee,)
)
Plaintiff,)
)
v.)
)
COFFEE COUNTY/MANCHESTER/)
TULLAHOMA MUSEUM, INC.)
)
Defendant.)

Case No.: 2020-cv-252

ANSWER TO DECLARATORY JUDGMENT SUIT

Comes the named Defendant, Coffee County/Manchester/Tullahoma Museum, Inc., by and through counsel, for answer to the Declaratory Judgment Suit filed against it and would respectfully show unto this Honorable Court that:

FIRST DEFENSE

The Defendant submits that the Declaratory Judgment Suit fails to state a cause of action upon which relief can be granted.

SECOND DEFENSE

For Answer to the specific statements contained in the Declaratory Judgment Suit, Defendant states as follows:

1. The statements contained in paragraph I are accepted;

2. The statement contained in sentence three of paragraph II is accepted. The defendant has insufficient information with which to either accept or reject all other statements contained in paragraph II;

3. The statements contained in paragraph III are accepted, but corrected as the name is more accurately reflected as Arrowheads/Aerospace Museum;

4. The statements contained in sentences one and two of paragraph IV are accepted. The statements contained in sentence three of paragraph IV are neither accepted nor rejected. Defendant has insufficient information with which to either accept or reject the statement contained in sentence four of paragraph IV. The statement contained in sentence five of paragraph IV is rejected;

5. Defendant has insufficient information with which to either accept or reject the statements contained in sentences one through seven of paragraph V. The statement contained in sentence eight of paragraph V is accepted. The statement contained in sentence nine of paragraph V is rejected;

6. The statement contained in sentence one of Paragraph VI is accepted. The Defendant has insufficient information with which to either accept or reject the remaining statements contained in sentences one through seven of paragraph VI; and

7. The statements contained in paragraph VII are rejected.

8. The remaining statements of Plaintiff's Declaratory Judgment Suit constitute a prayer for relief and thus, no response is required.

To the extent a response is deemed required, Defendant denies that the Plaintiff is entitled to any requested relief; and

9. Any statements of the Declaratory Judgment Suit neither accepted, explained, rejected or otherwise treated hereinabove are here and now specifically rejected as though set out verbatim.

THIRD DEFENSE

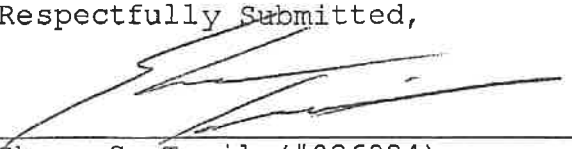
Defendant reserves the right to amend its Answers to the Declaratory Judgment Suit and/or to allege additional affirmative defenses.

WHEREFORE the Defendant having answered the Declaratory Judgment Suit filed against it in this cause denies that the Plaintiff is entitled to any of the relief for which it prays; and prays that the Declaratory Judgment Suit filed against Defendant be dismissed against it reasonable costs and attorney fees and any other general relief to which it may be entitled.

COFFEE COUNTY/MANCHESTER/TULLAHOMA,
MUSEUM, INC.

By: Keith A. Nash
Keith A. Nash, Chairman

Respectfully Submitted,



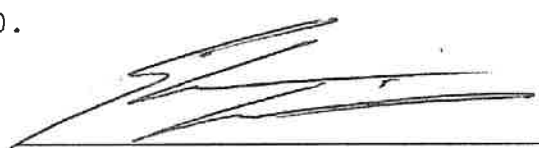
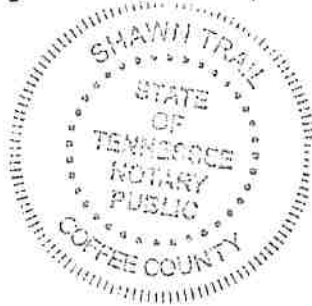
Shawn C. Trail (#026924)
Attorney for Defendant
117 South Spring Street
Manchester, Tennessee 37355
(931) 728-0419

CERTIFICATE OF SERVICE

I hereby certify that I have electronically and physically mailed a true and exact copy of the foregoing ANSWER TO DECLARATORY JUDGMENT SUIT to Attorney for Plaintiff, Mr. Robert L. Huskey, 514 Hillsboro Boulevard, Manchester, Tennessee 37355.

This the ~~24th~~ day of November, 2020.

25th



Shawn C. Trail