

In the Courts of the Saw Creek and Pine Ridge Indian Communities

CIVIL DIVISION

_____ ,)	Case No. _____
Plaintiff,)	
)	
VS.)	ANSWER,
)	COUNTERCLAIM,
)	AND
)	MOTION FOR DISMISSAL
)	
_____ ,)	
Defendant)	

TO THE ABOVE-NAMED PLAINTIFF AND TO REPRESENTING ATTORNEY OF RECORD:

COMES NOW, Defendant and without waiving challenges to this courts jurisdiction and without submitting thereto, for its Answer to the Plaintiff's Complaint alleges and states as follows:

I.

Denies each and every allegation contained in the Plaintiff's Complaint except as hereinafter admitted, qualified or explained.

II.

That the Complaint fails to state a claim against Defendant upon which relief can be granted.

III.

That the Court lacks jurisdiction over the subject matter of this action and the person of Defendant.

IV.

That there is insufficiency of process and service of process.

V.

That the Plaintiff has failed to (GIVE THE REASON FOR THIS CLAIM) for a just adjudication.

VI.

That venue in the above entitled matter is improper.

VII.

That the Plaintiff's cause of action is barred by the statute of limitations, statute of repose or by the equitable doctrine of laches.

VIII.

Specifically, the Defendant denies the allegations contained in their paragraphs 1, 2, 3 and 6.

COUNTERCLAIM FOR DAMAGES

That the Defendant counterclaims for Compensatory damages, Punitive Damages, Loss of Income, Attorneys Fees and Costs and disbursements.

MOTION FOR DISMISSAL

FOR the reasons stated herein the Defendant is requesting that this Court grant a Dismissal of this Complaint and for damages stated herein.

Dated this _____ day of _____, 20_____.

(NAME ATTORNEY/ADVOCATE BAR ID#
ADDRESS, PHONE #, FAX #
SPECIFY ATTORNEY FOR DEFENDANT)