

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 ROOSEVELT SIMMONS,)
 Plaintiff,)
)
 vs.)
)
 MASE and COMPANY, LLC,)
 J. AL CANNON, SHERIFF of)
 CHARLESTON COUNTY,)
 CHARLESTON COUNTY)
 Defendant.)
)
 _____)

IN THE COURT OF COMMON PLEAS

CASE NUMBER: 2011-CP-10-1084

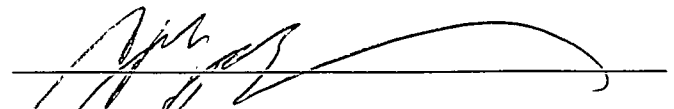
ANSWER OF DEFENDANT
 MASE and COMPANY, LLC

FILED
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 JULIE J. ARMSTRONG
 CLERK OF COURT
 BY _____

COMES NOW, MASE and COMPANY, LLC, Defendant in the within action, who hereby allege and respond to the Complaint, as follows:

1. They deny each and every allegation of the Complaint not hereafter specifically admitted.
2. Defendant lacks sufficient knowledge and information upon which to form an opinion or belief as to Paragraphs 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, (THIRD COUNT Paragraph numbers repeat, further denied) 16(2), 17(2), 18, 19, and 20 and therefore deny same and demand strict proof thereof.
3. They admit Paragraph 5 as being true and correct to the best of their knowledge.
4. Further answering the Complaint, and as and for a further defense thereto, Defendant alleges that the Complaint fails to state facts sufficient to constitute causes of action against it and should be dismissed.

WHEREFORE, having fully answered the Complaint, Defendant Mase and Company, LLC pray that the same be dismissed as to them with attorney's fees and costs, provide a QUITCLAIM deed by Roosevelt Simmons, Plaintiff, to Mase and Company, LLC, defendant, and for such other and further relief as the Court may deem appropriate.



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Sole owner, Mase and Company, LLC

CHARLESTON, SC
March 16, 2011