

Alan Cooper,  
Plaintiff,

Court File No.: 27-CV-13-3464  
Judge: Honorable Ann Leslie Alton

v.  
John Lawrence Steele, Prenda Law Inc., AF  
Holdings, LLC, Ingenuity13, LLC,  
Defendants.

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**DEFENDANT PRENDA LAW, INC.'S ANSWER TO PLAINTIFF'S COMPLAINT**

Defendant Prenda Law, Inc. ("Defendant") hereby files the following answers to Plaintiff Alan Cooper's ("Plaintiff") Complaint. Except for those paragraphs specifically admitted to or otherwise dealt with, Defendant denies all allegations in Plaintiff's Complaint.

**JURISDICTION AND VENUE**

1. Defendant lacks information sufficient to admit or deny the allegations in paragraph #1.
2. Defendant lacks information sufficient to admit or deny the allegations in paragraph #2.
3. Defendant admits it is a corporation with principal offices in Chicago, Illinois. Defendant denies the remaining allegations contained in paragraph #3.
4. Defendant denies the allegations contained in paragraph #4.
5. Defendant lacks information sufficient to admit or deny the allegations in paragraph #5.
6. Defendant lacks information sufficient to admit or deny the allegations in paragraph #6.
7. Defendant admits venue is proper in Hennepin County, Minnesota. Defendant denies the remaining allegations contained in paragraph #7.

## **FACTS**

8. Defendant lacks information sufficient to admit or deny the allegations in paragraph #8.
9. Defendant lacks information sufficient to admit or deny the allegations in paragraph #9.
10. Defendant lacks information sufficient to admit or deny the allegations in paragraph #10.
11. Defendant lacks information sufficient to admit or deny the allegations in paragraph #11.
12. Defendant lacks information sufficient to admit or deny the allegations in paragraph #12.
13. Defendant lacks information sufficient to admit or deny the allegations in paragraph #13.
14. Defendant lacks information sufficient to admit or deny the allegations in paragraph #14.
15. Defendant denies the allegations in paragraph #15.
16. Defendant denies the allegations in paragraph #16.
17. Defendant lacks information sufficient to admit or deny the allegations in paragraph #17.
18. Defendant admits the allegations in paragraph #18.
19. Defendant lacks information sufficient to admit or deny the allegations in paragraph #19 because Exhibit A is not attached to this complaint.
20. Defendant lacks information sufficient to admit or deny the allegations in paragraph #20 because Exhibit A is not attached to this complaint.
21. Defendant lacks information sufficient to admit or deny the allegations in paragraph #21.
22. Defendant lacks information sufficient to admit or deny the allegations in paragraph #22 because Exhibit B is not attached to this complaint.
23. Defendant lacks information sufficient to admit or deny the allegations in paragraph #23 because Exhibit B is not attached to this complaint.
24. Defendant lacks information sufficient to admit or deny the allegations in paragraph #24 because Exhibit C is not attached to this complaint.



25. Defendant lacks information sufficient to admit or deny the allegations in paragraph #25 because Exhibits A and C are not attached to this complaint.
26. Defendant lacks information sufficient to admit or deny the allegations in paragraph #26.
27. Defendant lacks information sufficient to admit or deny the allegations in paragraph #27.
28. Defendant denies the allegations in paragraph #28.
29. Defendant denies the allegations in paragraph #29.
30. Defendant denies the allegations in paragraph #30.
31. Defendant lacks information sufficient to admit or deny the allegations in paragraph #31.
32. Defendant denies the allegations in paragraph #32.
33. Defendant denies the allegations in paragraph #33.
34. Defendant denies the allegations in paragraph #34.
35. Defendant denies the allegations in paragraph #35.
36. Defendant lacks information sufficient to admit or deny the allegations in paragraph #36.
37. Defendant lacks information sufficient to admit or deny the allegations in paragraph #37.
38. Defendant lacks information sufficient to admit or deny the allegations in paragraph #38.
39. Defendant lacks information sufficient to admit or deny the allegations in paragraph #39 because Exhibit D is not attached to this complaint.
40. Defendant lacks information sufficient to admit or deny the allegations in paragraph #40.
41. Defendant lacks information sufficient to admit or deny the allegations in paragraph #41.

## **COUNT I**

### **INVASION OF PRIVACY - APPROPRIATION**

42. Defendant repeats and alleges the above answers as if fully set forth below.
43. Defendant denies the allegations in paragraph #43.

44. Defendant denies the allegations in paragraph #44.

45. Defendant denies the allegations in paragraph #45.

46. Defendant denies the allegations in paragraph #46.

## **COUNT II**

### **VIOLATION OF MINN. STAT. § 325D.44**

47. Defendant repeats and alleges the above answers as if fully set forth below.

48. Defendant denies the allegations in paragraph #48.

49. Defendant denies the allegations in paragraph #49.

50. Defendant lacks information sufficient to admit or deny the allegations in paragraph #50.

51. Defendant denies the allegations in paragraph #51.

52. Defendant lacks information sufficient to admit or deny the allegations in paragraph #52.

53. Defendant denies the allegations in paragraph #53.

54. Defendant denies the allegations in paragraph #54.

## **COUNT III**

### **CIVIL CONSPIRACY**

55. Defendant repeats and alleges the above answers as if fully set forth below.

56. Defendant denies the allegations in paragraph #56.

57. Defendant denies the allegations in paragraph #57.

58. Defendant denies the allegations in paragraph #58.

59. Defendant denies the allegations in paragraph #59.

60. Defendant denies the allegations in paragraph #60.



### **COUNT III**

#### **ALTER EGO – PIERCING CORPORATE VEIL – AF HOLDINGS**

61. Defendant repeats and alleges the above answers as if fully set forth below.
62. Defendant lacks information sufficient to admit or deny the allegations in paragraph #62.
63. Defendant denies the allegations in paragraph #63.
64. Defendant lacks information sufficient to admit or deny the allegations in paragraph #64 because Exhibit A is not attached to this complaint.
65. Defendant lacks information sufficient to admit or deny the allegations in paragraph #65 because Exhibit A is not attached to this complaint.
66. Defendant lacks information sufficient to admit or deny the allegations in paragraph #66.
67. Defendant lacks information sufficient to admit or deny the allegations in paragraph #67.
68. Defendant lacks information sufficient to admit or deny the allegations in paragraph #68.
69. Defendant lacks information sufficient to admit or deny the allegations in paragraph #69.
70. Defendant lacks information sufficient to admit or deny the allegations in paragraph #70.
71. Defendant lacks information sufficient to admit or deny the allegations in paragraph #71.
72. Defendant lacks information sufficient to admit or deny the allegations in paragraph #72.
73. Defendant lacks information sufficient to admit or deny the allegations in paragraph #73.
74. Defendant lacks information sufficient to admit or deny the allegations in paragraph #74.
75. Defendant lacks information sufficient to admit or deny the allegations in paragraph #75.

### **COUNT IV**

#### **ALTER EGO – PIERCING CORPORATE VEIL – INGENUITY13, LLC**

76. Defendant repeats and alleges the above answers as if fully set forth below.
77. Defendant lacks information sufficient to admit or deny the allegations in paragraph #77.

78. Defendant denies the allegations in paragraph #78.
79. Defendant lacks information sufficient to admit or deny the allegations in paragraph #79 because Exhibit B is not attached to this complaint.
80. Defendant lacks information sufficient to admit or deny the allegations in paragraph #80 because Exhibit B is not attached to this complaint.
81. Defendant lacks information sufficient to admit or deny the allegations in paragraph #81 because Exhibit B is not attached to this complaint.
82. Defendant lacks information sufficient to admit or deny the allegations in paragraph #82 because Exhibit B is not attached to this complaint.
83. Defendant lacks information sufficient to admit or deny the allegations in paragraph #83.
84. Defendant lacks information sufficient to admit or deny the allegations in paragraph #84.
85. Defendant lacks information sufficient to admit or deny the allegations in paragraph #85.
86. Defendant lacks information sufficient to admit or deny the allegations in paragraph #86.
87. Defendant lacks information sufficient to admit or deny the allegations in paragraph #87.
88. Defendant lacks information sufficient to admit or deny the allegations in paragraph #88.
89. Defendant lacks information sufficient to admit or deny the allegations in paragraph #89.
90. Defendant lacks information sufficient to admit or deny the allegations in paragraph #90.
91. Defendant lacks information sufficient to admit or deny the allegations in paragraph #91.
92. Defendant lacks information sufficient to admit or deny the allegations in paragraph #92.

#### **COUNT V**

#### **ALTER EGO – PIERCING CORPORATE VEIL – INGENUITY13, LLC**

93. Defendant repeats and alleges the above answers as if fully set forth below.
94. Defendant admits the allegations in paragraph #94.



95. Defendant denies the allegations in paragraph #95.
96. Defendant denies the allegations in paragraph #96.
97. Defendant denies the allegations in paragraph #97.
98. Defendant denies the allegations in paragraph #95.
99. Defendant denies the allegations in paragraph #95.
100. Defendant denies the allegations in paragraph #95.
101. Defendant denies the allegations in paragraph 101.
102. Defendant denies the allegations in paragraph 102.
103. Defendant denies the allegations in paragraph 103.
104. Defendant denies the allegations in paragraph 104.
105. Defendant denies the allegations in paragraph 105.
106. Defendant denies the allegations in paragraph 106.
107. Defendant denies the allegations in paragraph 107.

#### **AFFIRMATIVE DEFENSE**

*Plaintiff fails to state a claim upon which relief can be granted.*

#### **PRAYER FOR RELIEF**

WHEREFORE, having answered Plaintiff's Complaint, Defendant herein prays for relief as follows:

- A. That the Court enter judgment in Defendant's favor, with prejudice and on the merits;
- B. That Plaintiff take nothing by his claims;

- C. That Defendant be awarded its costs and attorneys' fees incurred in responding to the Plaintiff's Complaint; and
- D. That the Court grant Defendant such other and further relief as is deemed just and proper.

Respectfully submitted,

Prenda Law, Inc.

DATED: May 6, 2013

By: s/ Paul R. Hansmeier  
Paul R. Hansmeier  
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