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June 13, 2022

Mr. Keith Duncan
3469 Pin Oak Circle
Atlanta, GA 30340-2547

Via Regular Mail

RE: Keith Duncan v. City of Marietta, et al.
Cobb County Superior Court Civil Action File No.: 22-1-3042-68

Dear Mr. Duncan:

Pursuant to the above matter, enclosed please find the Answer of the City of Marietta and others.

Sincerely,

Haynie, Litchfield & White, P.C.
Attorneys for the City of Marietta



Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

KEITH DUNCAN)

Petitioner,)

v.)

CITY OF MARIETTA,)

MARIETTA POLICE CHIEF DAN FLYNN)

BENITO WISHON, Marietta Police Officer)

J.C. SCOTT HENSON, Marietta Police Officer)

MAJOR KING, Marietta Police Officer)

And others,)

Defendant.)

Civil Action No.
22-1-3042-68

ANSWER OF CITY OF MARIETTA AND

ALL DEFENDANTS NAMED ABOVE

Come now, Defendants City of Marietta and all Defendants named above, and file the following Answer in the above-styled action on behalf of the City of Marietta, Marietta Police Chief Dan Flynn, Marietta Police Officer Benito Wishon, Marietta Police Officer J.C. Scott Henson, and Marietta Police Officer Major King:

ANSWER

Plaintiff's Complaint does not comply with the Georgia Civil Practice Act and this document is not specific, is not precise, and further, is not understandable. As such, the City of Marietta responds to the allegations of Plaintiff's Complaint as

follows:

1.

Marietta Defendants deny each and every allegation contained herein.

2.

There are no ascertainable or concise allegations against any of the above-named Defendants.

RESPONSE TO ANY PRAYERS

Defendants deny any prayers contained in Plaintiff's Complaint.

RESPONSES TO ALL ALLEGATIONS

Every allegation and every prayer for relief of Plaintiff's Complaint are hereby denied.

Respectfully submitted this 10th day of JUNE, 2022.

/s/ Douglas R. Haynie

DOUGLAS R. HAYNIE

Georgia Bar No. 340800

DANIEL W. WHITE

Georgia Bar No. 153033

Attorneys for Defendant City of Marietta

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Marietta, GA 30060

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CERTIFICATE OF SERVICE

I, DOUGLAS R. HAYNIE, do hereby certify that I have this date served opposing counsel in the above-styled matter with a true and correct copy of the foregoing ANSWER OF THE CITY OF MARIETTA by depositing same in the United States mail, in a properly addressed envelope, with sufficient postage affixed thereon, addressed to:

MR. KEITH DUNCAN
3469 PIN OAK CIRCLE
ATLANTA, GA 30340-2547

This 10th day of JUNE, 2022.

/s/ Douglas R. Haynie
DOUGLAS R. HAYNIE
Georgia Bar No. 340800
DANIEL W. WHITE
Georgia Bar No. 153033

Attorneys for Defendant City of Marietta

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