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SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY

BRITTANY WENTWORTH and KELLI)	
HADEN, a married couple.)	
)	NO. 21-2-03285-7SEA
Plaintiffs,)	
vs.)	
)	ANSWER AND
JOSEPH PERNORIO and his marital)	AFFIRMATIVE DEFENSES
community;)	
)	
Defendants.)	
)	

COMES NOW DEFENDANT who answers Plaintiff's Complaint and alleges as follows:

1. Defendant admits paragraph 1.
2. Defendant denies paragraph 2 for want of information sufficient to form a belief as to the truth or falsity of the allegations contained therein.
3. Defendant admits paragraphs 3, 4, 5, and 6.
4. Defendant denies paragraphs 7, 8, and 9 for want of information sufficient to form a belief as to the truth or falsity of the allegations contained therein.
5. Defendant denies paragraphs 10, 11, 12, and 13.
6. Defendant denies paragraphs 14, 15, 16, and 17 for want of information sufficient to form a belief as to the truth or falsity of the allegations contained therein.
7. Defendant admits paragraph 18 insofar as Defendant did not seek veterinary care for Ghost.
8. Defendant denies paragraphs 19, 20, 21, and 22.

1 9. Defendant denies paragraphs 23, 24, 25, 26, 27, 28, 29, 30, and 31 for want of
2 information sufficient to form a belief as to the truth or falsity of the allegations contained
3 therein.

4 10. Defendant denies paragraph 32, 33, 34, and 35.

5 11. Defendant denies Claims I-VI *in toto*.

6 12. Defendant denies the balance of Plaintiff's Complaint.

7 BY WAY OF AFFIRMATIVE DEFENSE, Defendant alleges:

8 13. Plaintiffs possessed a dangerous, illegal animal in violation of statute or ordinance.

9 14. Plaintiffs failed to control said animal, which entered upon Defendants property and
10 attacked Defendants chickens with the intention of killing and/or eating them.

11 15. Defendant was justified in destroying Plaintiff's dangerous animal to protect his
12 person and property.

13 16. Plaintiffs fail to state claims upon which relief can be granted.

14 17. Plaintiffs are estopped from making claims against Defendant when they in fact
15 unleashed a dangerous, wild animal upon a quiet, tranquil corner of West Seattle.

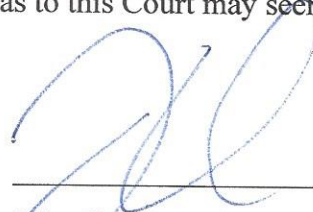
16 WHEREFORE, Defendant prays for dismissal of the Complaint with prejudice and that
17 Plaintiffs take nothing thereby, and

18 18. That the Court apportion fault if found, pursuant to R.C.W. 4.22, and,

19 19. Attorneys' fees pursuant to RCW 4.24.630, and

20 20. For such other and further relief as to this Court may seem just and equitable.

21 Dated this 23rd of April, 2021,

22
23
24 
25 _____
26 John H. O'Rourke WSBA 21615
27 Attorney for Defendants
28 johnhorourke@comcast.net
29
30