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February 8, 2017

Clifton A. Jackson #A652-163  
Lake Erie Correctional Institution  
501 Thompson Road/PO Box 8000  
Conneaut, Ohio 44030

Re: Clifton A. Jackson, et al. v. Mark Aufdenkampe, Esq., et al.  
Franklin County Case No. 17CV616  
Our File No. C20170025

Dear Mr. Jackson:

Enclosed for your records is a service copy of Defendant Mark Aufdenkampe's Answer to Plaintiff's Complaint in connection with the above-captioned matter.

Very truly yours,

A handwritten signature in black ink that reads "John C. Nemeth".

John C. Nemeth

JCN/ap  
Enc.

IN THE COMMON PLEAS COURT OF FRANKLIN COUNTY, OHIO  
CIVIL DIVISION

CLIFTON A. JACKSON, et al,

Plaintiff(s),

v.

MARK A. AUFDENKAMPE, ESQ., et al.,

Defendant(s).

CASE NO. 17CVH-616

JUDGE DAVID YOUNG

**ANSWER OF DEFENDANT MARK AUFDENKAMPE, ESQ.  
TO PLAINTIFF'S COMPLAINT  
(WITH JURY DEMAND ENDORSED HEREON)**

Now come Defendant Mark A. Aufdenkampe, Esq., by and through his undersigned counsel, and for his Answer to Plaintiff's Complaint makes the following admissions, denials, and sets forth these affirmative defenses.

**First Defense**

1. There has been an insufficiency of process and/or service of process upon this Defendant.

**Second Defense**

2. The court lacks personal jurisdiction of this answering Defendant.

**Third Defense**

3. Further answering, this Defendant specifically denies the allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41 and 42 of Plaintiff's Complaint.

4. In response to the allegations contained in paragraph 43 of Plaintiff's Complaint, under claim number 13, this Defendant admits that he is an attorney licensed to practice law in the State of Ohio, but specifically denies each and every allegation throughout the remainder of paragraph 43.
5. Further answering, this Defendant denies the allegations contained in paragraphs 44, 45, 46, 47, 48 and 49 of Plaintiff's Complaint, as well as each and every allegation throughout Plaintiff's Complaint not previously and expressly admitted to be true.

**Fourth Defense**

6. Plaintiff's Complaint is barred by the applicable statute of limitations.

**Fifth Defense**

7. Plaintiff's Complaint fails to state a claim upon which relief can be granted.

**Sixth Defense**

8. Venue is improper in Franklin County, Ohio

**Seventh Defense**

9. As to all other named Plaintiffs in the Complaint not only is there a failure to state a claim upon which relief can be granted, but there is no prayer for relief in the Complaint, which is otherwise deficient under the Ohio Rules of Civil Procedure.

**Eighth Defense**

10. Plaintiffs claim in whole or in part is barred under the doctrine of laches, judicial estoppel, waiver and/or estoppel.

**Ninth Defense**

11. This Defendant reserves the right to further amend his answer and to raise additional affirmative defenses as ongoing investigation and discovery so warrant.

Wherefore, Defendant Mark Aufdenkampe, Esq. demands that the Complaint as to him be dismissed and that he recovers his costs, fees and expenses herein and any further relief deemed appropriate by the Court.

Respectfully submitted,

/s/John C. Nemeth  
John C. Nemeth (0005670)  
David A. Herd (0059448)  
Anspach Meeks and Ellenberger LLP  
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Attorneys for Defendant Mark A.  
Aufdenkampe, Esq.

**JURY DEMAND**

Now comes the Defendant, by and through his undersigned counsel, and hereby demands a jury to hear the within cause.

/s/John C. Nemeth  
John C. Nemeth (0005670)  
David A. Herd (0059448)

**CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing was served by the court's electronic filing system and regular U.S. mail, postage pre-paid up on this 9<sup>th</sup> day of February 2017 upon:

Clifton A. Jackson #A652-163  
Lake Erie Correctional Institution  
501 Thompson Road/PO Box 8000

Conneaut, Ohio 44030  
Pro Se Plaintiff

/s/John C. Nemeth  
John C. Nemeth (0005670)  
David A. Herd (0059448)



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### Mark A. Aufdenkampe, LLC in Avon Lake, OH 44012 - cleveland.com

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### Mark A. Aufdenkampe, LLC Avon Lake, OH 44012 - YP.com

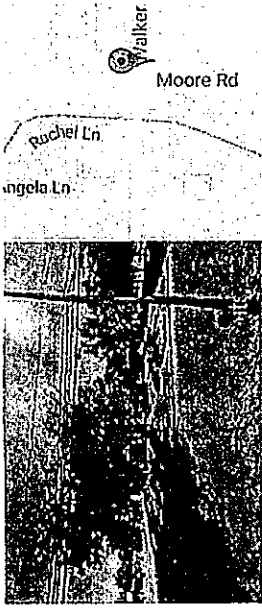
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### Mark Aufdenkampe | LinkedIn

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### Mark Aufdenkampe Atty, Avon Lake OH 44012 | 440-653-5275

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## Mark A. Aufdenkampe, LLC

Lawyer in Avon Lake, Ohio

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Phone: (440) 653-5275

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