



1           3.        Answering paragraph 3 of the Complaint, no answer is required. To the extent that  
2 a response may be required, defendants lack sufficient knowledge and information to admit or deny  
3 the allegations therein, therefore those allegations are denied.

4           4.        Answering paragraph 4 of the Complaint, defendants lack sufficient knowledge and  
5 information to admit or deny the allegations therein, therefore those allegations are denied.

6           5.        Answering paragraph 5 of the Complaint, defendants lack sufficient knowledge and  
7 information to admit or deny the allegations therein, therefore those allegations are denied.

8           6.        Answering paragraph 6 of the Complaint, no answer is required. To the extent that  
9 a response may be required, defendants lack sufficient knowledge and information to admit or deny  
10 the allegations therein, therefore those allegations are denied.

11          7.        Answering paragraph 7 of the Complaint, admit that Avtech Direct is a business with  
12 its principal place of business in Woodland Hills, California. The remaining allegations are denied  
13 or defendants lack sufficient knowledge and information to admit or deny the remaining allegations  
14 therein, therefore those allegations are denied.

15          8.        Answering paragraph 8 of the Complaint, admit that Arlene Sediqzad was an employee  
16 of Avtech. Further admit the location of her residence. The remaining allegations are either denied  
17 or defendants lack sufficient knowledge and information to admit or deny the allegations therein,  
18 therefore those allegations are denied.

19          9.        Answering paragraph 9 of the Complaint, admit that Gary Hunziker was an employee  
20 of Avtech. The remaining allegations are either denied or defendants lack sufficient knowledge and  
21 information to admit or deny the allegations therein, therefore those allegations are denied.

22          10.       Answering paragraph 10 of the Complaint, defendants lack sufficient knowledge and  
23 information to admit or deny the allegations therein, therefore those allegations are denied.

24          11.       Answering paragraph 11 of the Complaint, defendants lack sufficient knowledge and  
25 information to admit or deny the allegations therein, therefore those allegations are denied.

26          12.       Answering paragraph 12 of the Complaint, defendants reallege the answers in  
27 paragraphs 1 - 11 as if fully set forth herein. By way of further answer, defendants admit that Avtech

1 Direct participated in electronic marketing of computer systems and that the some of the advertising  
2 contained certain of the promotional materials alleged therein. However, defendants lack sufficient  
3 knowledge and information to admit or deny the remaining allegations therein, therefore those  
4 allegations are denied.

5 13. Answering paragraph 13 of the Complaint, defendants reallege the answers in  
6 paragraphs 1 - 12 as if fully set forth herein. By way of further answer, no answer is required. To the  
7 extent that a response may be required, defendants lack sufficient knowledge and information to admit  
8 or deny the allegations therein, therefore those allegations are denied.

9 14. Answering paragraph 14 of the Complaint, defendants reallege the answers in  
10 paragraphs 1 - 13 as if fully set forth herein. By way of further answer, defendants lack sufficient  
11 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
12 denied.

13 15. Answering paragraph 15 of the Complaint, those allegations are denied.

14 16. Answering paragraph 16 of the Complaint, defendants reallege the answers in  
15 paragraphs 1 - 15 as if fully set forth herein. By way of further answer, defendants lack sufficient  
16 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
17 denied.

18 17. Answering paragraph 17 of the Complaint, those allegations are denied.

19 18. Answering paragraph 18 of the Complaint, defendants reallege the answers in  
20 paragraphs 1 - 17 as if fully set forth herein. By way of further answer, defendants lack sufficient  
21 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
22 denied.

23 19. Answering paragraph 19 of the Complaint, those allegations are denied.

24 20. Answering paragraph 20 of the Complaint, defendants reallege the answers in  
25 paragraphs 1 - 19 as if fully set forth herein. By way of further answer, defendants lack sufficient  
26 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
27 denied.

1           21.     Answering paragraph 21 of the Complaint, those allegations are denied.

2           22.     Answering paragraph 22 of the Complaint, defendants reallege the answers in  
3 paragraphs 1 - 21 as if fully set forth herein. By way of further answer, defendants lack sufficient  
4 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
5 denied.

6           23.     Answering paragraph 23 of the Complaint, those allegations are denied.

7           24.     Answering paragraph 24 of the Complaint, defendants reallege the answers in  
8 paragraphs 1 - 23 as if fully set forth herein. By way of further answer, defendants lack sufficient  
9 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
10 denied.

11          25.     Answering paragraph 25 of the Complaint, those allegations are denied.

12          26.     Answering paragraph 26 of the Complaint, defendants reallege the answers in  
13 paragraphs 1 - 25 as if fully set forth herein. By way of further answer, defendants lack sufficient  
14 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
15 denied.

16          27.     Answering paragraph 27 of the Complaint, those allegations are denied.

17          28.     Answering paragraph 28 of the Complaint, defendants reallege the answers in  
18 paragraphs 1 - 27 as if fully set forth herein. By way of further answer, defendants lack sufficient  
19 knowledge and information to admit or deny the allegations therein, therefore those allegations are  
20 denied.

21          29.     Answering paragraph 29 of the Complaint, defendants lack sufficient knowledge and  
22 information to admit or deny the allegations therein, therefore those allegations are denied.

23          30.     Answering paragraph 30 of the Complaint, those allegations are denied.

24          31.     Answering paragraph 31 of the Complaint, no answer is required. To the extent that  
25 a response may be required, defendants lack sufficient knowledge and information to admit or deny  
26 the allegations therein, therefore those allegations are denied.





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**CERTIFICATE OF SERVICE**

I am over the age of 18; and not a party to this action.

I hereby certify that on January 28<sup>th</sup>, 2005, I caused the foregoing Answer To Complaint to be served on plaintiff's attorney as it was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

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DATED this 28th day of January, 2005.

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