

STATE OF NEW YORK
SUPREME COURT: COUNTY OF

Plaintiff _____, Index no.: _____
-against- ANSWER WITH
Defendant _____, AFFIRMATIVE DEFENSES

Defendant, _____, answers the Complaint and states as follows:

1. That she lacks sufficient information or knowledge to admit or deny paragraph 1 of the Complaint.
2. That she admits the allegations contained in paragraphs 2.
3. That she denies the allegations contained in paragraphs 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, and 21, as to specific credit card account, charges and amounts.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. The action is barred by the applicable statute of limitations.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

5. The Complaint fails to state a cause of action upon which relief may be granted.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

6. Satisfaction and Release.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

7. Plaintiff's claims are barred for failure to fulfill various conditions precedent and subsequent.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

8. Plaintiff's claims are barred by the Fair Debt Collection Practices Act, 15 U.S.C.A. 1692 et seq. ("the Act").

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

9. Plaintiff lacks standing to bring this suit.

Dated:

(Signature above)
Name, address, phone number

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF)

_____, being duly sworn, does depose and say that she is the Defendant in the within action, that she has read the foregoing Answer and knows the contents of same to be true to her own knowledge, except where stated to be upon information and belief, in which case she believes it to be true.

(Signature above)

Sworn to before me this _____ day
of _____, 20____

Notary Public: State of New York