

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

EMANUEL DUNAGAN, et al.,

Plaintiffs,

v.

ILLINOIS INSTITUTE OF ART-CHICAGO,
LLC, et al.,

Defendants.

Case No. 19-cv-809

Honorable Charles R. Norgle

**DEFENDANTS BRENT RICHARDSON,
CHRIS RICHARDSON, AND SHELLY MURPHY’S ANSWER TO PLAINTIFFS’
FOURTH AMENDED COMPLAINT AND JURY DEMAND**

Defendants Brent Richardson, Chris Richardson, and Shelly Murphy (collectively referred to as “Defendants”) submit this Answer to Plaintiffs’ Fourth Amended Class Action Complaint and Jury Demand (“Complaint”) and each and every claim for relief therein which is not expressly admitted in this Answer is denied. Defendants further admit, deny and affirmatively allege as follows:

1. As to Paragraph 1 of the Complaint, Defendants admit that this action is brought against Defendants. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the truth thereof.
2. Defendants deny the allegations in Paragraph 2 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.
3. Defendants deny the allegations in Paragraph 3 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.
4. Defendants deny the allegations in Paragraph 4 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

5. Defendants deny the allegations in Paragraph 5 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

6. Defendants deny the allegations in Paragraph 6 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

7. Defendants deny the allegations in Paragraph 7 of the Complaint.

8. Defendants deny the allegations in Paragraph 8 of the Complaint.

9. Defendants deny the allegations in Paragraph 9 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

10. Defendants deny the allegations in Paragraph 10 of the Complaint.

11. Defendants deny the allegations in Paragraph 11 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

12. Defendants deny the allegations in Paragraph 12 of the Complaint.

13. Defendants deny the allegations in Paragraph 13 of the Complaint.

14. Defendants deny the allegations in Paragraph 14 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

15. Defendants deny the allegations in Paragraph 15 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

16. Defendants deny the allegations in Paragraph 16 of the Complaint.

17. Defendants deny the allegations in Paragraph 17 of the Complaint.

18. Defendants deny the allegations in Paragraph 18 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

19. Defendants deny the allegations in Paragraph 19 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

20. Defendants deny the allegations in Paragraph 20 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

21. Defendants deny the allegations in Paragraph 21 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

22. Defendants deny the allegations in Paragraph 22 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

23. Defendants deny the allegations in Paragraph 23 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

24. Defendants deny the allegations in Paragraph 24 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

25. Defendants deny the allegations in Paragraph 25 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

26. Defendants deny the allegations in Paragraph 26 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

27. Defendants deny the allegations in Paragraph 27 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

28. Defendants deny the allegations in Paragraph 28 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

29. Defendants deny the allegations in Paragraph 29 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

30. As to Paragraph 30 of the Complaint, Defendants admit that Brent Richardson resides in Arizona and served as the Chief Executive Officer of DCEH and a member of its Board of Directors. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the truth thereof.

31. As to Paragraph 31 of the Complaint, Defendants admit that Chris Richardson resides in Arizona and served as Chief Counsel of DCEH and a member of its Board of Directors. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the truth thereof.

32. As to Paragraph 32 of the Complaint, Defendants admit that Shelly Murphy resides in Arizona and served as Chief Officer of Regulatory and Government Affairs for DCEH. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the truth thereof.

33. Defendants deny the allegations in Paragraph 33 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

34. Defendants deny the allegations in Paragraph 34 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

35. Defendants deny the allegations in Paragraph 35 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

36. Defendants deny the allegations in Paragraph 36 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

37. Defendants deny the allegations in Paragraph 37 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

38. Defendants deny the allegations in Paragraph 38 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

39. Defendants deny the allegations in Paragraph 39 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

40. Defendants deny the allegations in Paragraph 40 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

41. Defendants deny the allegations in Paragraph 41 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

42. Defendants deny the allegations in Paragraph 42 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

43. Defendants deny the allegations in Paragraph 43 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

44. Defendants deny the allegations in Paragraph 44 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

45. Defendants deny the allegations in Paragraph 45 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

46. Defendants deny the allegations in Paragraph 46 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

47. Defendants deny the allegations in Paragraph 47 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

48. Defendants deny the allegations in Paragraph 48 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

49. Defendants deny the allegations in Paragraph 49 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

50. Defendants deny the allegations in Paragraph 50 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

51. Defendants deny the allegations in Paragraph 51 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

52. Defendants deny the allegations in Paragraph 52 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

53. Defendants deny the allegations in Paragraph 53 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

54. As to Paragraph 54 of the Complaint, Defendants admit that Chris Richardson served as Chief Counsel of DCEH and a member of its Board of Directors. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the truth thereof.

55. Defendants deny the allegations in Paragraph 55 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

56. Defendants deny the allegations in Paragraph 56 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

57. Defendants deny the allegations in Paragraph 57 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

58. Defendants deny the allegations in Paragraph 58 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

59. Defendants deny the allegations in Paragraph 59 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

60. Defendants deny the allegations in Paragraph 58 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

61. Defendants deny the allegations in Paragraph 60 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

62. Defendants deny the allegations in Paragraph 62 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

63. Defendants deny the allegations in Paragraph 63 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

64. Defendants deny the allegations in Paragraph 64 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

65. Defendants deny the allegations in Paragraph 65 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

66. Defendants deny the allegations in Paragraph 66 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

67. Defendants deny the allegations in Paragraph 67 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

68. Defendants deny the allegations in Paragraph 68 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

69. Defendants deny the allegations in Paragraph 69 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

70. Defendants deny the allegations in Paragraph 70 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

71. Defendants deny the allegations in Paragraph 71 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

72. Defendants deny the allegations in Paragraph 72 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

73. Defendants deny the allegations in Paragraph 73 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

74. Defendants deny the allegations in Paragraph 74 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

75. Defendants deny the allegations in Paragraph 75 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

76. Defendants deny the allegations in Paragraph 76 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

77. Defendants deny the allegations in Paragraph 77 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

78. Defendants deny the allegations in Paragraph 78 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

79. Defendants deny the allegations in Paragraph 79 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

80. Defendants deny the allegations in Paragraph 80 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

81. Defendants deny the allegations in Paragraph 81 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

82. Defendants deny the allegations in Paragraph 82 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

83. Defendants deny the allegations in Paragraph 83 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

84. Defendants deny the allegations in Paragraph 84 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

85. Defendants deny the allegations in Paragraph 85 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

86. Defendants deny the allegations in Paragraph 86 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

87. Defendants deny the allegations in Paragraph 87 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

88. Defendants deny the allegations in Paragraph 88 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

89. Defendants deny the allegations in Paragraph 89 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

90. Defendants deny the allegations in Paragraph 90 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

91. Defendants deny the allegations in Paragraph 91 of the Complaint for lack of

sufficient information to form a belief as to the truth thereof.

92. Defendants deny the allegations in Paragraph 92 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

93. Defendants deny the allegations in Paragraph 93 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

94. Defendants deny the allegations in Paragraph 94 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

95. Defendants deny the allegations in Paragraph 95 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

96. Defendants deny the allegations in Paragraph 96 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

97. Defendants deny the allegations in Paragraph 97 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

98. Defendants deny the allegations in Paragraph 98 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

99. Defendants deny the allegations in Paragraph 99 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

100. Defendants deny the allegations in Paragraph 100 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

101. Defendants deny the allegations in Paragraph 101 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

102. Defendants deny the allegations in Paragraph 102 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

103. Defendants deny the allegations in Paragraph 103 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

104. Defendants deny the allegations in Paragraph 104 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

105. Defendants deny the allegations in Paragraph 105 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

106. Defendants deny the allegations in Paragraph 106 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

107. Defendants deny the allegations in Paragraph 107 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

108. Defendants deny the allegations in Paragraph 108 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

109. Defendants deny the allegations in Paragraph 109 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

110. Defendants deny the allegations in Paragraph 110 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

111. Defendants deny the allegations in Paragraph 111 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

112. Defendants deny the allegations in Paragraph 112 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

113. Defendants deny the allegations in Paragraph 113 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

114. Defendants deny the allegations in Paragraph 114 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

115. Defendants deny the allegations in Paragraph 115 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

116. Defendants deny the allegations in Paragraph 116 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

117. Defendants deny the allegations in Paragraph 117 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

118. Defendants deny the allegations in Paragraph 118 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

119. Defendants deny the allegations in Paragraph 119 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

120. Defendants deny the allegations in Paragraph 120 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

121. Defendants deny the allegations in Paragraph 121 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

122. Defendants deny the allegations in Paragraph 122 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

123. Defendants deny the allegations in Paragraph 123 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

124. Defendants deny the allegations in Paragraph 124 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

125. Defendants deny the allegations in Paragraph 125 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

126. Defendants deny the allegations in Paragraph 126 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

127. Defendants deny the allegations in Paragraph 127 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

128. Defendants deny the allegations in Paragraph 128 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

129. Defendants deny the allegations in Paragraph 129 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

130. Defendants deny the allegations in Paragraph 130 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

131. Defendants deny the allegations in Paragraph 131 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

132. Defendants deny the allegations in Paragraph 132 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

133. Defendants deny the allegations in Paragraph 133 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

134. Defendants deny the allegations in Paragraph 134 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

135. Defendants deny the allegations in Paragraph 135 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

136. Defendants deny the allegations in Paragraph 136 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

137. Defendants deny the allegations in Paragraph 137 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

138. Defendants deny the allegations in Paragraph 138 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

139. Defendants deny the allegations in Paragraph 139 of the Complaint.

140. Defendants deny the allegations in Paragraph 140 of the Complaint.

141. Defendants deny the allegations in Paragraph 141 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

142. Defendants deny the allegations in Paragraph 142 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

143. Defendants deny the allegations in Paragraph 143 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

144. Defendants deny the allegations in Paragraph 144 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

145. Defendants deny the allegations in Paragraph 145 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

146. Defendants deny the allegations in Paragraph 146 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

147. Defendants deny the allegations in Paragraph 147 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

148. Defendants deny the allegations in Paragraph 148 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

149. Defendants deny the allegations in Paragraph 149 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

150. Defendants deny the allegations in Paragraph 150 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

151. Defendants deny the allegations in Paragraph 151 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

152. Defendants deny the allegations in Paragraph 152 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

153. Defendants deny the allegations in Paragraph 153 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

154. Defendants deny the allegations in Paragraph 154 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

155. Defendants deny the allegations in Paragraph 155 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

156. Defendants deny the allegations in Paragraph 156 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

157. Defendants deny the allegations in Paragraph 157 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

158. Defendants deny the allegations in Paragraph 158 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

159. Defendants deny the allegations in Paragraph 159 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

160. Defendants deny the allegations in Paragraph 160 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

161. Defendants deny the allegations in Paragraph 161 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

162. Defendants deny the allegations in Paragraph 162 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

163. Defendants deny the allegations in Paragraph 163 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

164. Defendants deny the allegations in Paragraph 164 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

165. Defendants deny the allegations in Paragraph 165 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

166. Defendants deny the allegations in Paragraph 166 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

167. Defendants deny the allegations in Paragraph 167 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

168. Defendants deny the allegations in Paragraph 168 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

169. Defendants deny the allegations in Paragraph 169 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

170. Defendants deny the allegations in Paragraph 170 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

171. Defendants deny the allegations in Paragraph 171 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

172. Defendants deny the allegations in Paragraph 172 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

173. Defendants deny the allegations in Paragraph 173 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

174. Defendants deny the allegations in Paragraph 174 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

175. Defendants deny the allegations in Paragraph 175 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

176. Defendants deny the allegations in Paragraph 176 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

177. Defendants deny the allegations in Paragraph 177 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

178. Defendants deny the allegations in Paragraph 178 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

179. Defendants deny the allegations in Paragraph 179 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

180. Defendants deny the allegations in Paragraph 180 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

181. Defendants deny the allegations in Paragraph 181 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

182. Defendants deny the allegations in Paragraph 182 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

183. Defendants deny the allegations in Paragraph 183 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

184. Defendants deny the allegations in Paragraph 184 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

185. Defendants deny the allegations in Paragraph 185 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

186. Defendants deny the allegations in Paragraph 186 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

187. Defendants deny the allegations in Paragraph 187 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

188. Defendants deny the allegations in Paragraph 188 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

189. Defendants deny the allegations in Paragraph 189 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

190. Defendants deny the allegations in Paragraph 190 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

191. Defendants deny the allegations in Paragraph 191 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

192. Defendants deny the allegations in Paragraph 192 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

193. Defendants deny the allegations in Paragraph 193 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

194. Defendants deny the allegations in Paragraph 194 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

195. Defendants deny the allegations in Paragraph 195 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

196. Defendants deny the allegations in Paragraph 196 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

197. Defendants deny the allegations in Paragraph 197 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

198. Defendants deny the allegations in Paragraph 198 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

199. Defendants deny the allegations in Paragraph 199 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

200. Defendants deny the allegations in Paragraph 200 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

201. Defendants deny the allegations in Paragraph 201 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

202. Defendants deny the allegations in Paragraph 202 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

203. Defendants deny the allegations in Paragraph 203 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

204. Defendants deny the allegations in Paragraph 204 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

205. Defendants deny the allegations in Paragraph 205 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

206. Defendants deny the allegations in Paragraph 206 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

207. Defendants deny the allegations in Paragraph 207 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

208. Defendants deny the allegations in Paragraph 208 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

209. Defendants deny the allegations in Paragraph 209 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

210. Defendants deny the allegations in Paragraph 210 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

211. Defendants deny the allegations in Paragraph 211 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

212. Defendants deny the allegations in Paragraph 212 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

213. Defendants deny the allegations in Paragraph 213 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

214. Defendants deny the allegations in Paragraph 214 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

215. Defendants deny the allegations in Paragraph 215 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

216. Defendants deny the allegations in Paragraph 216 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

217. Defendants deny the allegations in Paragraph 217 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

218. Defendants deny the allegations in Paragraph 218 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

219. Defendants deny the allegations in Paragraph 219 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

220. Defendants deny the allegations in Paragraph 220 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

221. Defendants deny the allegations in Paragraph 221 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

222. Defendants deny the allegations in Paragraph 222 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

223. Defendants deny the allegations in Paragraph 223 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

224. Defendants deny the allegations in Paragraph 224 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

225. Defendants deny the allegations in Paragraph 225 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

226. Defendants deny the allegations in Paragraph 226 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

227. Defendants deny the allegations in Paragraph 227 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

228. Defendants deny the allegations in Paragraph 228 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

229. Defendants deny the allegations in Paragraph 229 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

230. Defendants deny the allegations in Paragraph 230 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

231. Defendants deny the allegations in Paragraph 231 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

232. Defendants deny the allegations in Paragraph 232 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

233. Defendants deny the allegations in Paragraph 233(a-d) of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

234. As to Paragraph 234 of the Complaint, Defendants admit that this action is brought against Defendants. All of the other allegations in said paragraph of the Complaint are denied for lack of sufficient information to form a belief as to the

truth thereof.

235. Defendants deny the allegations in Paragraph 235 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

236. Defendants deny the allegations in Paragraph 236 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

237. Defendants deny the allegations in Paragraph 237 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

238. Defendants deny the allegations in Paragraph 238 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

239. Defendants deny the allegations in Paragraph 239 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

240. Defendants deny the allegations in Paragraph 240 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

241. Defendants deny the allegations in Paragraph 241 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

242. Defendants deny the allegations in Paragraph 241 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

243. Defendants deny the allegations in Paragraph 243 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

244. Defendants deny the allegations in Paragraph 244(a-g) of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

245. Defendants deny the allegations in Paragraph 245 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

246. Defendants deny the allegations in Paragraph 246(a-b) of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

247. Defendants deny the allegations in Paragraph 247 of the Complaint.

248. Defendants deny the allegations in Paragraph 248 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

249. Defendants deny the allegations in Paragraph 249 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

250. Defendants deny the allegations in Paragraph 250(a-c) of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

251. Defendants deny the allegations in Paragraph 251 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

252. Defendants deny the allegations in Paragraph 252 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

253. Defendants deny the allegations in Paragraph 253 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

254. Defendants deny the allegations in Paragraph 254 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

255. Defendants deny the allegations in Paragraph 255 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

256. Defendants deny the allegations in Paragraph 256 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

257. Defendants deny the allegations in Paragraph 257 of the Complaint.

258. Defendants deny the allegations in Paragraph 258 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

259. Defendants deny the allegations in Paragraph 259 of the Complaint.

260. Defendants deny the allegations in Paragraph 260 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

261. Defendants deny the allegations in Paragraph 261 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

262. Defendants deny the allegations in Paragraph 262 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

263. Defendants deny the allegations in Paragraph 263 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

264. Defendants deny the allegations in Paragraph 264 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

265. Defendants deny the allegations in Paragraph 265 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

266. Defendants deny the allegations in Paragraph 266 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

267. Defendants deny the allegations in Paragraph 267 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

268. Defendants deny the allegations in Paragraph 268 of the Complaint.

269. Defendants deny the allegations in Paragraph 269 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

270. Defendants deny the allegations in Paragraph 270 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

271. Defendants deny the allegations in Paragraph 271 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

272. Defendants deny the allegations in Paragraph 272 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

273. Defendants deny the allegations in Paragraph 273 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

274. Defendants deny the allegations in Paragraph 274 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

275. Defendants deny the allegations in Paragraph 275 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

276. Defendants deny the allegations in Paragraph 276 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

277. Defendants deny the allegations in Paragraph 277 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

278. Defendants deny the allegations in Paragraph 278 of the Complaint.

279. Defendants deny the allegations in Paragraph 279 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

280. Defendants deny the allegations in Paragraph 280 of the Complaint.

281. Defendants deny the allegations in Paragraph 281 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

282. Defendants deny the allegations in Paragraph 282 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

283. Defendants deny the allegations in Paragraph 283 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

284. Defendants deny the allegations in Paragraph 284 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

285. Defendants deny the allegations in Paragraph 285 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

286. Defendants deny the allegations in Paragraph 286 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

287. Defendants deny the allegations in Paragraph 287 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

288. Defendants deny the allegations in Paragraph 288 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

289. Defendants deny the allegations in Paragraph 289 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

290. Defendants deny the allegations in Paragraph 290 of the Complaint.

291. Defendants deny the allegations in Paragraph 291 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

292. Defendants deny the allegations in Paragraph 292 of the Complaint.

293. Defendants deny the allegations in Paragraph 293 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

294. Defendants deny the allegations in Paragraph 294 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

295. Defendants deny the allegations in Paragraph 295 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

296. Defendants deny the allegations in Paragraph 296 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

297. Defendants deny the allegations in Paragraph 297 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

298. Defendants deny the allegations in Paragraph 298 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

299. Defendants deny the allegations in Paragraph 299 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

300. Defendants deny the allegations in Paragraph 300 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

301. Defendants deny the allegations in Paragraph 300 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

302. Defendants deny the allegations in Paragraph 301 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

303. Defendants deny the allegations in Paragraph 303 of the Complaint.

304. Defendants deny the allegations in Paragraph 304 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

305. Defendants deny the allegations in Paragraph 305 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

306. Defendants deny the allegations in Paragraph 306 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

307. Defendants deny the allegations in Paragraph 307 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

308. Defendants deny the allegations in Paragraph 308 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

309. Defendants deny the allegations in Paragraph 309 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

310. Defendants deny the allegations in Paragraph 310 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

311. Defendants deny the allegations in Paragraph 311 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

312. Defendants deny the allegations in Paragraph 312 of the Complaint.

313. Defendants deny the allegations in Paragraph 313 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

314. Defendants deny the allegations in Paragraph 314 of the Complaint.

315. Defendants deny the allegations in Paragraph 315 of the Complaint.

316. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-315 of the Complaint.

317. Defendants deny the allegations in Paragraph 317 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

318. Defendants deny the allegations in Paragraph 318 of the Complaint.

319. Defendants deny the allegations in Paragraph 319 of the Complaint.

320. Defendants deny the allegations in Paragraph 320 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

321. Defendants deny the allegations in Paragraph 321 of the Complaint.

322. Defendants deny the allegations in Paragraph 322 of the Complaint.

323. Defendants deny the allegations in Paragraph 323 of the Complaint.

324. Defendants deny the allegations in Paragraph 324 of the Complaint.

325. Defendants deny the allegations in Paragraph 325 of the Complaint.

326. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-325 of the Complaint.

327. Defendants deny the allegations in Paragraph 327 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

328. Defendants deny the allegations in Paragraph 328 of the Complaint.

329. Defendants deny the allegations in Paragraph 329 of the Complaint.

330. Defendants deny the allegations in Paragraph 330 of the Complaint.

331. Defendants deny the allegations in Paragraph 331 of the Complaint.

332. Defendants deny the allegations in Paragraph 332 of the Complaint.

333. Defendants deny the allegations in Paragraph 333 of the Complaint.

334. Defendants deny the allegations in Paragraph 334 of the Complaint.

335. Defendants deny the allegations in Paragraph 335 of the Complaint.

336. Defendants deny the allegations in Paragraph 336 of the Complaint.

337. Defendants deny the allegations in Paragraph 337 of the Complaint.

338. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-338 of the Complaint.

339. Defendants deny the allegations in Paragraph 339 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

340. Defendants deny the allegations in Paragraph 340 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

341. Defendants deny the allegations in Paragraph 341 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

342. Defendants deny the allegations in Paragraph 342 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

343. Defendants deny the allegations in Paragraph 343 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

344. Defendants deny the allegations in Paragraph 344 of the Complaint.

345. Defendants deny the allegations in Paragraph 345 of the Complaint.

346. Defendants deny the allegations in Paragraph 346 of the Complaint.

347. Defendants deny the allegations in Paragraph 347 of the Complaint.

348. Defendants deny the allegations in Paragraph 348 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

349. Defendants deny the allegations in Paragraph 349 of the Complaint.

350. Defendants deny the allegations in Paragraph 350 of the Complaint.

351. Defendants deny the allegations in Paragraph 351 of the Complaint.

352. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-351 of the Complaint.

353. Defendants deny the allegations in Paragraph 353 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

354. Defendants deny the allegations in Paragraph 354 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

355. Defendants deny the allegations in Paragraph 355 of the Complaint.

356. Defendants deny the allegations in Paragraph 356 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

357. Defendants deny the allegations in Paragraph 357 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

358. Defendants deny the allegations in Paragraph 358 of the Complaint.

359. Defendants deny the allegations in Paragraph 359 of the Complaint.

360. Defendants deny the allegations in Paragraph 360 of the Complaint.

361. Defendants deny the allegations in Paragraph 361 of the Complaint.

362. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-361 of the Complaint.

363. Defendants deny the allegations in Paragraph 363 of the Complaint.

364. Defendants deny the allegations in Paragraph 364 of the Complaint.

365. Defendants deny the allegations in Paragraph 365 of the Complaint.

366. Defendants deny the allegations in Paragraph 366 of the Complaint for lack

of sufficient information to form a belief as to the truth thereof.

367. Defendants deny the allegations in Paragraph 367 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

368. Defendants admit the quotation cited in the allegations of Paragraph 368 of the Complaint. Defendants deny the remaining allegations in Paragraph 368 of the Complaint.

369. Defendants deny the allegations in Paragraph 369 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

370. Defendants deny the allegations in Paragraph 370 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

371. Defendants deny the allegations in Paragraph 371 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

372. Defendants deny the allegations in Paragraph 372 of the Complaint for lack of sufficient information to form a belief as to the truth thereof.

373. Defendants deny the allegations in Paragraph 373 of the Complaint.

374. Defendants deny the allegations in Paragraph 374 of the Complaint.

375. Defendants deny the allegations in Paragraph 375 of the Complaint.

376. Defendants deny the allegations in Paragraph 374 of the Complaint.

377. Defendants deny the allegations in Paragraph 377 of the Complaint.

378. Defendants deny the allegations in Paragraph 378 of the Complaint.

379. Defendants deny the allegations in Paragraph 379 of the Complaint.

380. Defendants deny the allegations in Paragraph 380 of the Complaint.

381. Defendants deny the allegations in Paragraph 381 of the Complaint.

GENERAL AND AFFIRMATIVE DEFENSES

382. Defendants incorporate the admissions and denials as set forth in Paragraphs 1-382 of the Complaint.

383. Defendants deny each and every allegation contained in the Complaint and each and every claim for relief therein which is not expressly admitted in this Answer.

384. As and for a separate defense, and in the alternative, Defendants allege the Complaint fails to state a claim upon which relief may be granted against Defendants.

385. As and for a separate defense, Defendants allege that at all relevant times material hereto, based on all relevant facts and circumstances known by Defendants at the time Defendants so acted, Defendants acted in good faith.

386. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs lacks standing to bring and maintain its claims.

387. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs fail to satisfy all or part of the requirements set forth in Fed.R.Civ.P. 23(a)(1) through (4).

388. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs fail to satisfy all or part of the requirements set forth in Fed.R.Civ.P. 23(b)(1) through (3).

389. As and for a separate defense, and in the alternative, Defendants allege that

Plaintiffs have plead no set of facts sufficient to sustain its burden of proving that they are representative of an alleged class.

390. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs' and the absent class members' claims are precluded and/or barred by the doctrines of full faith and credit and *res judicata* pursuant to orders entered in the matter *Digital Media Solutions, LLC v. South University LLC, et al.*, Case No. 19-cv-145 (N.D. Ohio).

391. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs' claims are barred because Plaintiffs assigned the claims asserted in this lawsuit, as well as any potential recovery, to the Department of Education.

392. As and for a separate defense, and in the alternative, Defendants allege that Plaintiffs' damages, if any should be offset by amounts already refunded, or debt already forgiven.

393. Defendants hereby join in, incorporate herein, and separately assert as affirmative defenses each affirmative defense heretofore asserted in this lawsuit by Defendants and co-defendants, namely Dream Center Education Foundation, a non-profit California corporation, and Dream Center Education Holdings, LLC, an Arizona limited liability company.

394. To avoid waiver, Defendants affirmatively pleads the following defenses: lack of jurisdiction over the subject matter, lack of jurisdiction over the person, accord and satisfaction, duress, estoppel, unclean hands, set-off, failure to join an indispensable party, failure of consideration, fraud, illegality, laches, license,

payment, release, res judicata, statute of frauds, statute of limitations, insufficiency of process and insufficiency of service of process, waiver, and every other affirmative defense or avoidance constituting a defense as provided under Rules 8 and 12 of Fed.R.Civ.P., the applicable state law, and the common law which discovery may reveal. By pleading these general and affirmative defenses, Defendants do not assume the burden of proving any fact, issue, or element of a claim for relief where such burden properly belongs to the Plaintiffs. Defendants reserve the right to supplement this list of affirmative defenses as discovery progresses.

395. Defendants hereby gives notice that it intends to rely upon such other and further affirmative defenses and counterclaims that may potentially become available as a result of information developed though discovery and/or trial and hereby reserves its right to amend its Answer to assert such defenses or claims.

JURY DEMAND

396. Defendants demand a trial by jury as to all matters alleged by Plaintiffs.

PRAYER FOR RELIEF

WHEREFORE, having fully answered the Complaint, Defendants request:

- A. That the Complaint be dismissed with prejudice and that Plaintiff take nothing thereby;
- B. That this Court deny the declaratory relief sought by Plaintiffs;
- C. That this Court deny the injunctive relief sought by Plaintiffs;
- D. That this Court deny Plaintiffs' request for class certification;

- E. That the Defendants be awarded its attorney's fees and costs; and
- F. For such other relief as the Court deems just.

DATED September 9, 2021.

By: s/ Michael A. Schern
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1640 S. Stapley Dr., Ste. 132
Mesa, AZ 85204
(480) 632-1929
courtdocs@srflawfirm.com
Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2021, I caused the forgoing document to be electronically filed using the Court's CM/ECF system, notification of which will be sent all to counsel of record.

By: s/ Michael A. Schern