

**COURT OF COMMON PLEAS
FOR LICKING COUNTY, OHIO**

CLERK COMMON
PLEAS COURT
LICKING CO. OHIO
2018 APR 11 PM 2:00
GARY R. WALTERS
CLERK

Dennis Cauchon,)
)
 Plaintiff,)
)
 v.)
)
 Granville Exempted Village School)
 District Board of Education, (et al.))
)
 Defendant(s).)

Case No. 18CV0341
Judge Branstool
**Defendant(s)' Answer to Plaintiff's
Complaint and Request for
Injunctive Relief**

For its Answer to Plaintiff's Complaint and Request for Injunctive Relief, Defendants Granville Exempted Village School District Board of Education and board members Russ Ginise, Thomas Miller, Jen Cornman, and Amy Deeds state as follows:

FIRST DEFENSE

1. Defendants deny the allegations contained in paragraph 1 of the Complaint as the allegations contained within this paragraph set forth legal conclusions and statements of purpose or intent to which no responsive pleading is required or appropriate.
2. Defendants deny the allegations contained in paragraph 2 of the Complaint.
3. Defendants deny the allegations contained in paragraph 3 of the Complaint.
4. Defendants deny the allegations contained in paragraph 4 of the Complaint as the allegations contained within this paragraph set forth legal conclusions and statements of purpose or intent to which no responsive pleading is required or appropriate.
5. Defendants deny the allegations contained in paragraph 5 of the Complaint as the allegations contained within this paragraph set forth legal conclusions and statements of purpose or intent to which no responsive pleading is required or appropriate.

36. Paragraph 36 of the Complaint contains legal arguments or conclusions of law to which no response is required.

37. Paragraph 37 of the Complaint contains legal arguments or conclusions of law to which no response is required.

38. Paragraph 38 of the Complaint contains legal arguments or conclusions of law to which no response is required.

SECOND DEFENSE

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

THIRD DEFENSE

40. At all times pertinent to the Complaint, the Defendants acted in complete compliance with R.C. 121.22 and in good faith.

FOURTH DEFENSE

41. All four Board Member Defendants are entitled to political subdivision immunity pursuant to R.C. 2744.

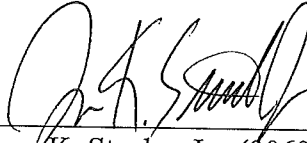
FIFTH DEFENSE

42. R.C. 121.22 does not authorize damages against individual defendants.

WHEREFORE, having fully answered Defendants pray that:

1. Judgment be entered in their favor against Plaintiff;
2. This Court dismiss the Complaint with prejudice;
3. Defendants be awarded its costs and disbursements, including reasonable attorneys fees; and
4. The Court grant Defendants such other relief as justice requires.

Respectfully submitted,

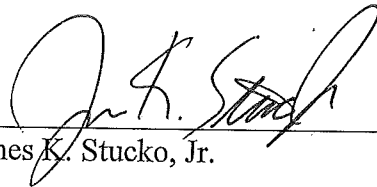


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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true copy of Defendant(s)' Answer to Plaintiff's Complaint and Request for Injunctive Relief was sent by email to denniscauchon@gmail.com and by regular U.S. mail, postage prepaid, to Dennis Cauchon, Plaintiff, 935 River Road, Suite G, Granville, Ohio 40323 this 10th day of April, 2018.



James K. Stucko, Jr.