

**IN THE SUPERIOR COURT OF CHATHAM COUNTY**

**STATE OF GEORGIA**

<b>MBM DEVELOPMENTS, LLC,</b>	]	
	]	
<b>Plaintiff,</b>	]	
	]	
<b>vs.</b>	]	<b>Civil Action # SPCV22-00842-KA</b>
	]	
<b>D&amp;A DISTRIBUTION, LLC, and SAVANNAH</b>	]	
<b>MALL REALTY HOLDING, LLC,</b>	]	
	]	
<b>Defendants.</b>	]	

**ANSWER**

D&A Distribution, LLC (“D&A”), defendant in the above-captioned matter, herein, answers Plaintiff’s complaint, as follows:

**FIRST DEFENSE:** Plaintiff’s complaint fails to state a claim upon which relief can be granted.

**SECOND DEFENSE:** Plaintiff lacks standing to pursue the claims asserted.

**THIRD DEFENSE:** Defendant answers the individually numbered paragraphs of Plaintiff’s complaint as follows:

1. Paragraph 1 of Plaintiff’s complaint is admitted.
2. Paragraph 2 of Plaintiff’s complaint is admitted.
3. Paragraph 3 of Plaintiff’s complaint is admitted.
4. D&A is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 4 of Plaintiff’s complaint, which therefore stand denied.
5. D&A is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5 of Plaintiff’s complaint, which therefore stand denied.
6. D&A is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 6 of Plaintiff’s complaint, which therefore stand denied.

7. D&A is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 7 of Plaintiff's complaint, which therefore stand denied.

8. Paragraph 8 of Plaintiff's complaint is denied.

9. D&A is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9 of Plaintiff's complaint, which therefore stand denied.

10. Paragraph 10 of Plaintiff's complaint is denied.

11. Paragraph 11 of Plaintiff's complaint is denied.

12. Paragraph 12 of Plaintiff's complaint is denied.

13. Paragraph 13 of Plaintiff's complaint is denied.

14. Paragraph 14 of Plaintiff's complaint is denied.

15. Paragraph 15 of Plaintiff's complaint is denied.

16. Paragraph 16 of Plaintiff's complaint is denied.

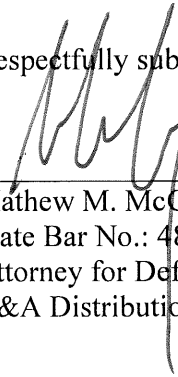
17. Paragraph 17 of Plaintiff's complaint is denied.

Each and every allegation of Plaintiff's complaint not expressly and specifically admitted above is hereby denied.

Therefore, D&A prays that Plaintiff's complaint be dismissed, with all costs of this action cast against Plaintiff and that it be awarded such other and further relief as the Court deems just and proper.

This 21<sup>st</sup> day of September, 2022.

Respectfully submitted,



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D&A Distribution, LLC

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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served counsel for all parties in the foregoing matter with a copy of this pleading by electronic mail and by STATUTORY ELECTRONIC SERVICE through the Court's Odyssey E-Filing Notice System.

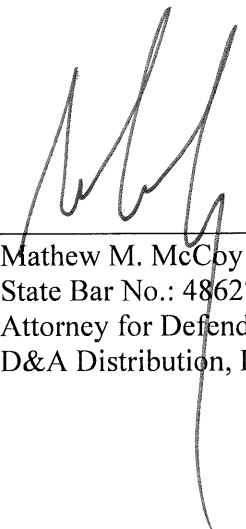
This 21<sup>st</sup> day of September, 2022.

Persons served:

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