

DAVID CREWS, CLERK
By *[Signature]*
Deputy
Plaintiffs

William Roberts Wilson, JR., et. al.

vs.

3:09 CV 006-NBB-SAA

Richard F. Scruggs, et. al.

Defendants

SEPARATE ANSWER OF TIMOTHY R. BALDUCCI
TO PLAINTIFF'S 1ST AMENDED COMPLAINT

COMES NOW, Separate Defendant, Timothy R. Balducci,
and in ANSWER to Plaintiff's 1ST Amended Complaint, would show:

I.

Balducci admits the material allegations of Plaintiff's
1ST Amended Complaint; and further, admits liability to Plaintiff
under all causes of action asserted therein.

II.

Balducci moves the Court for a hearing on Plaintiff's
damages, and an allocation of same, if any, to Balducci at
the appropriate time.

III.

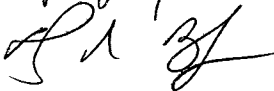
Balducci moves for the Court to apportion the Plaintiff's
damages to all Defendants, and non-party entities/persons
who may be liable as well.

IV.

Balducci affirmatively pleads indemnity and contribution
from all Defendants, and non-party entities/persons who may
be liable as well.

This, the 4th Day of April, 2009.

Respectfully Submitted,



Timothy R. Balducci, Pro Se

#12739-042

FCI - Estill

Satellite Camp - Unit F

P.O. Box 689

Estill, S.C. 29918

I hereby certify that I have mailed my Answer to Plaintiff's 1st Amended Complaint, first-class, postage pre-paid to:

Ms. Cynthia Mitchell, Esq.

P.O. Box 1388

Clarksdale, MS 38614

This the 4th Day of April, 2009.

