

VIRGINIA:

IN THE CIRCUIT COURT OF SPOTSYLVANIA COUNTY

AMY S. PAPPAS, Administrator of the Estate )  
of Michael G. Pappas, Deceased, )  
 )  
Plaintiff, )  
v. ) Case No.: CL06-1222  
 )  
HOMEOWNERS TITLE, L.L.C., )  
and )  
GLENDA POTTER, Personal Representative of )  
the Estate of Richard L. Potter, Deceased )  
 )  
Defendants )  
 )

ANSWER

COMES NOW the Defendant, Homeowners Title, LLC ("the defendant"), by counsel, and states the following as its Answer to the Complaint filed herein by the Plaintiff, Amy S. Pappas, Administrator of the Estate of Michael G. Pappas, Deceased:

1. The allegations of Paragraph 1 of Plaintiff's Complaint are admitted.
2. It is admitted that Michael G. Pappas, died on February 22, 2006, in the aircraft crash in Stafford County and that the aircraft was owned by defendant Homeowners Title, LLC. The remainder of the allegations of Paragraph 2 of Plaintiff's Complaint are denied.
3. It is admitted that the aircraft (N400WX with the designation LC41-550FG, also referred to as a Columbia 400) was owned by Defendant Homeowners Title, LLC and that Mr. Pappas was killed while an occupant of this aircraft. The remainder of the allegations of Paragraph 3 of Plaintiff's Complaint are denied.

4. It is admitted that Glenda S. Potter is the duly appointed Executor of the Estate of Richard Lee Potter, Deceased, having been duly appointed by the Spotsylvania County Circuit Court on the 9<sup>th</sup> day of May, 2006. The remainder of the allegations of Paragraph 4 of the Plaintiff's Complaint are denied.
5. The allegations of Paragraph 5 of Plaintiff's Complaint are admitted.
6. In response to Paragraph 6 of the Plaintiff's Complaint, this defendant incorporates, by reference, the answers to Paragraphs 1 through 5 above as if fully stated herein.
7. This defendant believes that this information is correct, but is without detailed knowledge sufficient to form a belief as to truth of all of the allegations and/or conclusions set forth in Paragraph 7 of Plaintiff's Complaint and therefore calls for proof of the same.
8. It is admitted that the aircraft was destroyed when it crashed at Stafford Regional Airport (RMN) in Stafford County, Virginia, while on an instrument flight plan between Smith Reynolds Airport (INT) in Winston-Salem, North Carolina and Shannon Airport (EZF). The remainder of the allegations of Paragraph 8 of the Plaintiff's Complaint are denied.
9. The aircraft number was N400WX and was also called a Columbia 400 with designation LC41-550FG. The remainder of the allegations of Paragraph 9 of the Complaint are denied.
10. It is admitted that Decedent Potter was a member of Homeowner's Title, LLC, that Homeowners, LLC was the aircraft owner and that Decedent Potter received

training to operate the subject aircraft. The remainder of the allegations of Paragraph 10 of Plaintiff's Complaint are denied.

11. It is admitted that Decedent Potter held a private pilot certificate with single engine land, and instrument-airplane rating.
12. The allegations of Paragraph 12 of Plaintiff's Complaint are admitted with regard to the flight of February 22, 2006.
13. This defendant is without knowledge or information sufficient to form a belief as to truth of the allegations and/or conclusions set forth in Paragraph 13 through 27 of Plaintiff's Complaint and therefore denies the same.
14. This defendant denies the allegations contained in Paragraph 28 of Plaintiff's Complaint, including sub-parts (a) through (j).
15. In response to Paragraph 29 of the Plaintiff's Complaint, this defendant incorporates by reference the answers set forth in Paragraph 1 through 14 above as if fully stated herein.
16. This defendant denies the allegations contained in Paragraph 30 of Plaintiff's Complaint.
17. This defendant is without specific knowledge of the allegations of Paragraph 31 of Plaintiff's Complaint and therefore denies the same and calls for strict proof thereof.
18. Any allegation not specifically admitted is denied.
19. This defendant alleges that the plaintiff has failed to state a claim upon which relief can be granted.

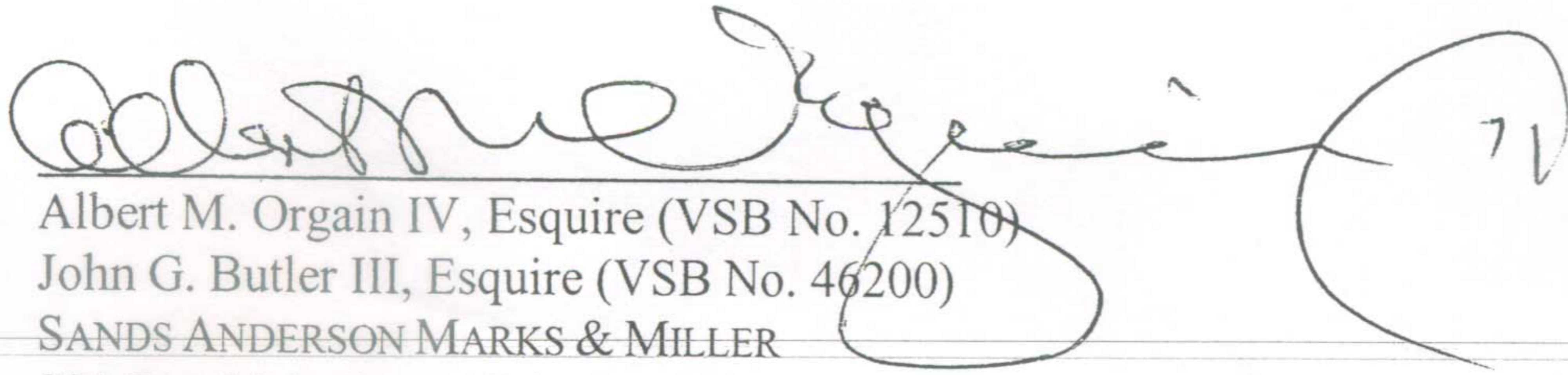
20. This defendant alleges that the accident was caused by an intervening or superseding cause for which this defendant was not responsible.
21. This defendant alleges that the Decedent, Richard L. Potter, was not acting in the ordinary course of business or in the furtherance of business for Homeowners Title, LLC, at any time during the flights of February 22, 2006.
22. This defendant reserves the right to amend this Answer, to assert other defenses discovered or found from the evidence.
23. This defendant denies that it is indebted to the plaintiff in the amount of TEN MILLION DOLLARS (\$10,000,000.00) or in any other amount or on any other account.

WHEREFORE, Homeowners Title, LLC, by counsel, moves this Court to deny Plaintiff's Complaint and enter judgment on behalf of this defendant.

Trial by jury is demanded.

HOMEOWNERS TITLE, LLC

By Counsel

 71

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