

# EXHIBIT D

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ORLEANS

AB 511 DOE,

Plaintiff,

v.

Index No.: 2020/46602

LYNDONVILLE CENTRAL SCHOOL DISTRICT;  
LYNDONVILLE ELEMENTARY SCHOOL.

Defendants.

**DEFENDANTS' ANSWER TO PLAINTIFF'S  
AMENDED COMPLAINT**

Defendants, Lyndonville Central School District and Lyndonville Elementary School, by and through their attorneys, Webster Szanyi LLP, as and for its Answer to the Plaintiff's Amended Complaint state as follows:

1. The allegations contained in paragraph 1 of Plaintiff's Amended Complaint call for a legal conclusion that does not require an admission or denial, to the extent any response is required, the Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained therein and therefore denies the same.

2. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 2 of Plaintiff's Amended Complaint and therefore denies same.

3. The allegations contained in paragraph 3 of Plaintiff's Amended Complaint call for a legal conclusion that does not require an admission or denial, to the extent any response is required, the Defendants deny knowledge or information

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sufficient to form a belief as to the truth or falsity of the allegations contained therein and therefore denies the same.

4. Admit the allegations contained in paragraph 4 of Plaintiff's Amended Complaint insofar as Lyndonville Central School District is a public-school district located in the County of Orleans and State of New York and otherwise deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations insofar as the allegations are vague and ambiguous as to what times are considered material.

5. Admit the allegations contained in paragraph 5 of Plaintiff's Amended Complaint insofar as Lyndonville Elementary School is part of the Lyndonville Central School District and otherwise deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations on the basis that they call for a legal conclusion and are vague and ambiguous as to what times are considered material.

6. Admit the allegations contained in paragraph 6 of Plaintiff's Amended Complaint insofar as Terry E. Houseman was an employee of the Lyndonville Central School District for a period of time and otherwise deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations insofar as the allegations are vague and ambiguous as to what times are considered material.

7. The allegations contained in paragraph 7 of Plaintiff's Amended Complaint call for a legal conclusion that does not require an admission or denial, to the extent any response is required, the Defendants deny knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained therein and therefore denies the same.

8. The allegations contained in paragraph 8 of Plaintiff's Amended Complaint call for a legal conclusion that does not require an admission or denial.

9. The allegations contained in paragraph 9 of Plaintiff's Amended Complaint call for a legal conclusion that does not require an admission or denial, to the extent any response is required, the Defendants deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained therein and therefore denies the same.

10. Deny the allegations contained in paragraph 10 of Plaintiff's Amended Complaint.

11. Admit the allegations contained in paragraph 11 of Plaintiff's Amended Complaint.

12. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 12 of Plaintiff's Amended Complaint.

13. Deny the allegations contained in paragraph 13 of Plaintiff's Amended Complaint.

14. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 14 of Plaintiff's Amended Complaint and therefore denies same.

15. Deny the allegations contained in paragraph 15 of Plaintiff's Amended Complaint.

16. Deny the allegations contained in paragraph 16 of Plaintiff's Amended Complaint.

17. Deny the allegations contained in paragraph 17 of Plaintiff's Amended Complaint.

18. Deny the allegations contained in paragraph 18 of Plaintiff's Amended Complaint.

19. Deny the allegations contained in paragraph 19 of Plaintiff's Amended Complaint.

20. Deny the allegations contained in paragraph 20 of Plaintiff's Amended Complaint.

21. Deny the allegations contained in paragraph 21 of Plaintiff's Amended Complaint.

22. Deny the allegations contained in paragraph 22 of Plaintiff's Amended Complaint.

23. Deny the allegations contained in paragraph 23 of Plaintiff's Amended Complaint.

24. Deny the allegations contained in paragraph 24 of Plaintiff's Amended Complaint.

25. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 25 of Plaintiff's Amended Complaint and therefore denies same.

26. Admit or deny the allegation set forth in paragraphs numbered 1 through 25 as previously admitted or denied.

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