

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON**

Village of Camden, Ohio, :  
 :  
 Plaintiff(s) : CASE NO. 3:20-CV-273  
v. : Judge Douglas R. Cole  
Cargill, Incorporated, et al. : DEFENDANT R. GOOD RENTALS,  
 : LLC'S AMENDED ANSWER TO  
 Defendants. : COMPLAINT

Comes now Defendant, R. Good Rentals, LLC (“Good Rentals”), and pursuant to Federal Civil Rule 15(a)(1), which allows for amendment as a matter of course, hereby amends its Answer to the Complaint filed by Village of Camden, Ohio (“Plaintiff”), and states and avers as follows:

**FIRST DEFENSE**

1. The Complaint fails to state a claim upon which relief can be granted.

**SECOND DEFENSE**

2. In response to paragraphs 1 through 3 of Plaintiff’s Complaint, these allegations are not directed at Good Rentals, and Good Rentals is without information sufficient to affirm or deny the allegations, and therefore denies same
3. In response to paragraph 4 of Plaintiffs’ Complaint, Good Rentals admits that it owned the identified property, and that it is aware that Cargill and Central Salt stored salt there, but denies that it is owned or operated by Rodney Good.
4. In response to paragraphs 5 and 6 of Plaintiff’s Complaint, Good Rentals admits the allegations in paragraphs 5 and 6.

5. In response to paragraph 7 of Plaintiff's Complaint, Good Rentals states that this paragraph constitutes a pleading to which no response is required.

6. In response to paragraphs 8 through 12 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations, and therefore denies same.

7. In response to paragraphs 13 through 19 of Plaintiff's Complaint, Good Rentals states that these allegations are moot after the removal of the case to federal court.

8. In response to paragraph 20 of Plaintiff's Complaint, Good Rentals states that this paragraph constitutes a pleading to which no response is required.

9. In response to paragraphs 21 and 22 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations in paragraphs 21 and 22, and therefore denies same.

10. In response to paragraphs 23 through 26 of Plaintiff's Complaint, Good Rentals denies the allegations in paragraphs 23 through 26.

11. In response to paragraphs 27 and 28 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations, and therefore denies same.

12. In response to paragraph 29 through 31 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations, having not entered into those contracts or being a party to the Cargill or Central Salt relationship, and therefore denies the allegations in paragraphs 29 through 31.

13. In response to paragraph 32 of Plaintiff's Complaint, Good Rentals denies the allegations in paragraph 32.

14. In response to paragraphs 33 and 34 of Plaintiff's Complaint, Good Rentals states that the Court's July 29, 2019 Judgment Entry speaks for itself.

15. In response to paragraphs 35 and 36 of Plaintiff's Complaint, Good Rentals denies the allegations in paragraphs 35 and 36.

16. In response to paragraphs 37 and 38 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations, and therefore denies same.

17. In response to paragraph 39 of Plaintiff's Complaint, Good Rentals denies the allegations in paragraph 39.

18. In response to paragraph 40 of Plaintiff's Complaint, Good Rentals states that this paragraph constitutes a pleading to which no response is required. Good Rentals incorporates the foregoing averments as if fully restated herein.

19. In response to paragraphs 41 through 49 of Plaintiff's Complaint, Good Rentals is without information sufficient to affirm or deny the allegations, and therefore denies same.

20. In response to paragraph 50 of Plaintiff's Complaint, Good Rentals denies the allegations in paragraph 50.

### **THIRD DEFENSE**

21. Plaintiff's claims are barred by the applicable statute of limitations.

### **FOURTH DEFENSE**

22. Good Rentals reserves the right to assert additional defenses that may become available or evident in discovery.

WHEREFORE, having fully answered, Good Rentals prays that the Complaint be dismissed, that Good Rentals be awarded judgment in its favor on all claims against it, and that it be awarded such other relief, legal or equitable, as is appropriate.

Respectfully submitted,

/s/ Matthew A. Rich

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by filing through the Court's CM/ECF service on this 8<sup>th</sup> day of July, 2020 and by mailing a copy to the following counsel of record:

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