

STATE OF MICHIGAN

IN THE 6TH CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MILFORD HILLS PROPERTIES,
INC., a Michigan Corporation
and
RPL of MICHIGAN, INC.,
A Michigan Corporation.

Plaintiffs,

v

Hon. D. Langford Morris
Case No. 2017-162642-CZ

CHARTER TOWNSHIP OF MILFORD,
a Michigan charter township.

Defendant.

LAW OFFICE OF PAUL E. BURNS
Attorneys for Plaintiffs
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By: Bradford L. Maynes (P68319)
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PLAINTIFF'S ANSWER TO AFFIRMATIVE DEFENSES

Plaintiffs, MILFORD HILLS PROPERTIES, INC., a Michigan Corporation, and RPL of
Michigan, Inc., a Michigan Corporation, by and through their attorneys, LAW OFFICE OF

PAUL E. BURNS, by PAUL E. BURNS and BRADFORD L. MAYNES and LUCAS LAW, PC, by FREDERICK LUCAS, and for their Answer to Affirmative Defenses state as follows:

1. The allegations contained in paragraph one are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
2. The allegations contained in paragraph two are denied as untrue for the reasons that Plaintiff has fully exhausted its administrative remedies with the Charter Township of Milford ("Milford") Zoning Board of Appeals.
3. The allegations contained in paragraph three are denied as untrue for the reasons that Plaintiff has obtained a final decision from the Milford Zoning Board of Appeals.
4. The allegations contained in paragraph four are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
5. The allegations contained in paragraph five are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
6. The allegations contained in paragraph six are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
7. The allegations contained in paragraph seven are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
8. The allegations contained in paragraph eight are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
9. The allegations contained in paragraph nine are denied as untrue for the reasons set forth in Plaintiffs' Complaint.
10. The allegations contained in paragraph ten are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

11. The allegations contained in paragraph eleven are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

12. The allegations contained in paragraph twelve are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

13. The allegations contained in paragraph thirteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

14. The allegations contained in paragraph fourteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

15. The allegations contained in paragraph fifteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

16. The allegations contained in paragraph sixteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

17. The allegations contained in paragraph seventeen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

18. The allegations contained in paragraph eighteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

19. The allegations contained in paragraph nineteen are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

20. The allegations contained in paragraph twenty are denied as untrue for the reasons set forth in Plaintiffs' Complaint.


21. The allegations contained in paragraph twenty-one are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

22. The allegations contained in paragraph twenty-two are denied as untrue for the reasons set forth in Plaintiffs' Complaint.

23. The allegations contained in paragraph twenty-three are neither admitted nor denied for the reason that Plaintiffs lack sufficient information to form a belief as to the truth thereof.

Respectfully submitted,

LAW OFFICE OF PAUL E. BURNS



Dated: February 28, 2018

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