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COMMONWEALTH OF KENTUCKY
MADISON CIRCUIT COURT
DIVISION II
CIVIL ACTION, FILE NO. 04-CI-00308

ANTHONY CRANE RENTAL, LIMITED PARTNERSHIP, d/b/a MAXIM CRANE WORKS	)	
PLAINTIFF	)	ANSWER ON BEHALF OF THE HARTFORD FIRE INSURANCE CO.
V.	)	
WILLIAM T. KANE, INC., et. al.	)	
DEFENDANTS	)	

*** *** *** *** ***

ANSWER

Comes the Defendant, The Hartford Fire Insurance Co., by counsel, and for its Answer to the Complaint filed herein by the Plaintiff, states as follows:

FIRST AFFIRMATIVE DEFENSE

This action fails to state a claim upon which relief may be granted against this Defendant, and this Defendant should therefore be dismissed from this action.

SECOND AFFIRMATIVE DEFENSE

This action is barred by the applicable statute of limitations and should therefore be dismissed.

THIRD AFFIRMATIVE DEFENSE

1. The Defendant is without sufficient information or knowledge so as to form a belief as to the truth of the allegations contained in paragraphs one (1), two (2), four (4), five (5), nine (9), ten (10), eleven (11), twelve (12), thirteen (13), fourteen (14), sixteen (16), seventeen (17), eighteen

(18), nineteen (19), twenty (20), twenty-one (21), twenty-six (26), twenty-seven (27), thirty-three (33), thirty-four (34) and thirty-nine (39) of the Plaintiff's Complaint and therefore denies the same.

2. The Defendant admits the allegations contained in paragraphs three (3), six (6), seven (7), eight (8), twenty-two (22), thirty-two (32) and thirty-eight (38) of the Plaintiff's Complaint.

3. The Defendant specifically denies each and every remaining allegation of the Plaintiff's Complaint.

WHEREFORE, the Defendant, The Hartford Fire Insurance Co., demands that the Plaintiff's Complaint be dismissed and held for naught; for its costs herein expended, including attorney fees; for trial by jury; and for all other relief to which it may appear entitled.

COY, GILBERT & GILBERT
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Mark A. Shepherd, Attorney
for Defendant, The Hartford Fire Insurance Co.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was mailed, via U.S. Mail, on this the 11th day of May, 2004, to:

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