

PAMELA JONES BULLOCH

SECOND JUDICIAL DISTRICT COURT

VS. C-32967

PARISH OF JACKSON

FILED

GARY D. NUNN

STATE OF LOUISIANA

APR 25 2012

BY *Melody Gates*
MELODY GATES/DY. CLERK

ANSWER

NOW INTO COURT, through undersigned counsel, comes Gary D. Nunn, who, in answer to the Petition filed by Plaintiff herein, Pamela Jones Bulloch, respectfully represents the following:

1.

Defendant, Gary D. Nunn, admits his status as a named defendant herein but specifically denies any allegations as to liability to Plaintiff herein.

2.

The allegations of paragraph 2 of the Petition are denied.

3.

The allegations of paragraph 3 of the Petition as to defendant, Pamela Jones Bulloch, being arrested for numerous charges are admitted.

4.

The allegations of paragraph 4 of the Petition are denied as written.

5.

The allegations of paragraph 5 of the Petition are denied as written. Plaintiff met with Defendant on April 20, 2011 and not for the purpose of resolving the outstanding charges because that would have to have been done in court.

6.

The allegations of paragraph 6 of the Petition are denied.

7.

The allegations of paragraph 7 of the Petition are denied.

8.

The allegations of paragraph 8 of the Petition are denied. Further answering, Defendant does show that he told plaintiff that if she pled guilty to the DWI that the underlying charges would be dismissed, that the Judge would probably give her a plea under Article 894, and that the Judge would probably give her some time to pay the fine and costs. Further answering, Defendant shows that what was told to her is the normal sentence given for a DWI 1st offense.

9.

The allegations of paragraph 9 of the Petition are denied.

10.

The allegations of paragraph 10 of the Petition are denied.

11.

The allegations of paragraph 11 of the Petition are denied.

12.

The allegations of paragraph 12 of the Petition are denied.

13.

The allegations of paragraph 13 of the Petition are denied.

14.

Further answering, Defendant shows that Pamela Bulloch has continually made false allegations against him because he would not dismiss her DWI charge. Defendant shows that Pamela Bulloch and her live in boyfriend at the time, Reggie McKinney, made several requests for help on the DWI including a request for dismissal of the DWI, request for Pre-trial Diversion, and request that Defendant help her not have to have the breath machine in her vehicle, all of which were denied. Further answering, Defendant shows that Pamela Bulloch made statements that she would do anything to have the DWI dismissed. She was informed that no other help could be given. As a result of the denial for the requested help, Pamela Bulloch became very angry and has made a concerted effort to defame Defendant. Defendant further shows that Pamela Bulloch is a very troubled individual that has a history of illegal drug and alcohol abuse. Further answering, Defendant shows that Pamela Bulloch has continually tried to harass defendant by making false allegations in an attempt to defame him and cause harm to him.

15.

Further answering, Defendant shows that Pamela Bulloch has continually stated that she would plead guilty to the DWI including to State Police but that she has still not pled guilty and still wants the DWI dismissed.

WHEREFORE, Defendant, Gary D. Nunn, PRAYS that this answer be deemed good and sufficient and that after due proceedings are had, Plaintiffs' claims be dismissed at Plaintiff's cost.

Respectfully submitted,

LAW OFFICES OF GARY D. NUNN
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(318) 259-8777
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GARY D. NUNN (BAR ROLL NO. 17410)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Answer has been served upon
Plaintiff,

Pamela Bulloch
230 Morgan Hare Road
Monroe, LA 71201

by first class mail, postage prepaid on this the 25th day of April, 2012.


OF COUNSEL