INDEPENDENCE COUNTY, ARKANSAS CIRCUIT CLERK GREG WALLIS FILED FOR RECORD BY R SCOTT POLSTON D.C.

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IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS DOMESTIC RELATIONS DIVISION

LUNDEN ROBERTS

PLAINTIFF

V.

CAUSE NO. 32DR-19-187-2

HUNTER BIDEN

DEFENDANT

RESPONSE TO MOTION FOR ATTORNEY'S FEES AND COSTS TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Hunter Biden ("Defendant" herein), and files this Response to Motion for Attorney's Fees and Costs, and would show the following:

- 1. For answer to Paragraph 1 of the Motion for Attorney's Fees and Costs, Defendant admits that Plaintiff has filed suit for paternity and support.
- 2. For answer to Paragraph 2 of the Motion for Attorney's Fees and Costs, Defendant denies the allegations contained therein and demands strict proof.
- 3. For answer to Paragraph 3 of the Motion for Attorney's Fees and Costs, Defendant denies the allegations contained therein and demands strict proof.
- 4. For answer to Paragraph 4 of the Motion for Attorney's Fees and Costs, Defendant denies the allegations contained therein and demands strict proof.
- 5. For answer to Paragraph 5 of the Motion for Attorney's Fees and Costs, Defendant can neither admit or deny the allegation contained therein and therefore denies same.
- 6. For answer to Paragraph 6 of the Motion for Attorney's Fees and Costs, Defendant denies the allegations contained therein and demands strict proof.
- 7. For answer to Paragraph 7 of the Motion for Attorney's Fees and Costs, Defendant denies the allegations contained therein and demands strict proof.

- 8. Defendant denies all allegations not admitted to herein and those asserted in the Prayer.
- 9. Defendant specifically reserves the right to amend his Response and allege all defenses, affirmative or otherwise as discovery is completed.

WHEREFORE, the Defendant prays that Plaintiff's Motion for Attorney's Fees and Costs be denied; for attorney's fees and costs; and or all other just and proper relief to which he may be entitled.

Respectfully submitted,

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Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on each attorney of record or party on the 9th day of December 2019, as follows:

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Via U.S.P.S. 1st Class & <u>clint@thelancasterlawfirm.com</u>
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Brent M. Langdon
Attorney for Defendant