

SECOND DEFENSE

10. Lend Lease's counterclaim fails to state a claim upon which relief can be granted.

THIRD DEFENSE

11. Lend Lease's counterclaim is beyond the statute of limitations.

FOURTH DEFENSE

12. Lend Lease's counterclaim is barred by the statute of fraud.

FIFTH DEFENSE

13. The damages alleged in Lend Lease's counterclaim were not caused by the Defendant.

WHEREFORE, Defendant having fully answered Lend Lease's counterclaim, respectfully requests that this Court dismiss the counterclaim in its entirety at Lend Lease's costs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendant's Answer to Lend Lease's Counterclaim was sent by regular U.S. mail, postage prepaid, this 27th day of April, 2015 to:

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