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DOUGLAS CRANE KNEUBUHL aka MIKE KNEUBUHL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

FRANCES K. OPELLE, as Pro Per,
Plaintiff,

vs.

DOUGLAS CRANE KNEUBUHL aka
MIKE KNEUBUHL,
Defendant(s).

Case No. 8:17-cv-00961-DOC (KESx)
Assigned to: District Judge David O.
Carter; Magistrate Judge: Karen E.
Scott

**ANSWER OF DOUGLAS CRANE
KNEUBUHL aka MIKE
KNEUBUHL TO PLAINTIFF'S
COMPLAINT**

JURY TRIAL DEMANDED

Defendant, Douglas Crane Kneubuhl aka Mike Kneubuhl ("Kneubuhl")
responds to Plaintiff's Complaint as follows:

JURISDICTION

Admit.

VENUE

Deny. The United States District Court for the Central District of California is
the proper venue for this removed action due to the diversity of citizenship of Plaintiff
(Honolulu County, Hawaii) and Defendant (Orange County, California)

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ANSWER TO ALLEGATIONS

Pending Litigation in American Samoa

1. Defendant admits the allegations contained in paragraph 1 of the Complaint.

2. Defendant admits the allegations contained in paragraph 2 of the Complaint.

3. Defendant admits the allegations contained in paragraph 3 of the Complaint.

4. Defendant admits the allegations contained in paragraph 4 of the Complaint.

5. Defendant admits the allegations contained in paragraph 5 of the Complaint.

6. Defendant admits the allegations contained in paragraph 6 of the Complaint.

7. Defendant admits the allegations contained in paragraph 7 of the Complaint.

8. Defendant admits the allegations contained in paragraph 8 of the Complaint.

9. Defendant admits the allegations contained in paragraph 9 of the Complaint.

10. Defendant admits the allegations contained in paragraph 10 of the Complaint.

11. Defendant admits the allegations contained in paragraph 11 of the Complaint.

12. Defendant lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations of paragraph 12 of the Complaint and, therefore, denies the same.

1 therefore, denies the same.

2 24. Defendant admits the allegations contained in paragraph 24 of the
3 Complaint.

4 25. Defendant admits the allegations contained in paragraph 25 of the
5 Complaint.

6 26. Defendant admits the allegations contained in paragraph 26 of the
7 Complaint.

8 27. Defendant admits the allegations contained in paragraph 27 of the
9 Complaint.

10 28. Defendant admits the allegations contained in paragraph 28 of the
11 Complaint.

12 29. Defendant admits the allegations contained in paragraph 29 of the
13 Complaint.

14 30. Defendant admits the allegations contained in paragraph 30 of the
15 Complaint.

16 31. Defendant lacks knowledge or information sufficient to form a belief as
17 to the truth or accuracy of the allegations of paragraph 31 of the Complaint and,
18 therefore, denies the same.

19 32. Defendant admits the allegations contained in paragraph 32 of the
20 Complaint.

21 **STATEMENT OF FACTS**

22 **Relationship Between Plaintiff and Defendant and Their Background**

23 33. [sic] There is no paragraph 33 in the Complaint.

24 34. Defendant admits the allegations contained in paragraph 34 of the
25 Complaint.

26 35. Defendant admits the allegations contained in paragraph 35 of the
27 Complaint.

28 36. Defendant admits the allegations contained in paragraph 36 of the

1 Complaint.

2 37. Admitted in part and denied in part. Defendant lacks knowledge or
3 information sufficient to form a belief as to the truth or accuracy of the allegations of
4 paragraph 37 of the Complaint and, therefore, denies the same, except Defendant
5 admits that Plaintiff and Defendant were raised together as young children in
6 American Samoa.

7 38. Defendant admits the allegations contained in paragraph 38 of the
8 Complaint.

9 39. Defendant admits the allegations contained in paragraph 39 of the
10 Complaint.

11 40. Defendant admits the allegations contained in paragraph 40 of the
12 Complaint.

13 41. Defendant admits the allegations contained in paragraph 41 of the
14 Complaint.

15 42. Defendant admits the allegations contained in paragraph 42 of the
16 Complaint.

17 43. Defendant admits the allegations contained in paragraph 43 of the
18 Complaint.

19 44. Defendant lacks knowledge or information sufficient to form a belief as
20 to the truth or accuracy of the allegations of paragraph 44 of the Complaint and,
21 therefore, denies the same.

22 45. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 45 of the Complaint and, therefore,
24 denies the same.

25 46. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 46 of the Complaint and, therefore,
27 denies the same.

28 47. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 47 of the Complaint and, therefore,
2 denies the same.

3 48. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 48 of the Complaint and, therefore,
5 denies the same.

6 49. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 49 of the Complaint and, therefore,
8 denies the same.

9 50. Defendant lacks knowledge or information sufficient to form a belief as to
10 the truth or accuracy of the allegations of paragraph 50 of the Complaint and, therefore,
11 denies the same.

12 51. To the extent the allegations of this paragraph are based upon documents,
13 including emails, the alleged documents are in writing and speak for themselves and
14 Defendant denies any characterization thereof. Further, Defendant lacks knowledge or
15 information sufficient to form a belief as to the truth or accuracy of the allegations of
16 paragraph 51 of the Complaint and, therefore, denies the same.

17 52. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 52 of the Complaint and, therefore,
19 denies the same.

20 53. Defendant lacks knowledge or information sufficient to form a belief as to
21 the truth or accuracy of the allegations of paragraph 53 of the Complaint and, therefore,
22 denies the same.

23 54. Defendant lacks knowledge or information sufficient to form a belief as to
24 the truth or accuracy of the allegations of paragraph 54 of the Complaint and, therefore,
25 denies the same.

26 55. Defendant admits the allegations contained in paragraph 55 of the
27 Complaint.

28 56. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 56 of the Complaint and, therefore,
2 denies the same.

3 57. Defendant admits the allegations contained in paragraph 57 of the
4 Complaint.

5 58. Defendant lacks knowledge or information sufficient to form a belief as to
6 the truth or accuracy of the allegations of paragraph 58 of the Complaint and, therefore,
7 denies the same.

8 59. Defendant lacks knowledge or information sufficient to form a belief as to
9 the truth or accuracy of the allegations of paragraph 59 of the Complaint and, therefore,
10 denies the same.

11 60. To the extent the allegations of this paragraph are based upon documents,
12 including emails, the alleged documents are in writing and speak for themselves and
13 Defendant denies any characterization thereof. Defendant lacks knowledge or
14 information sufficient to form a belief as to the truth or accuracy of the allegations of
15 paragraph 60 of the Complaint and, therefore, denies the same.

16 61. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 61 of the Complaint and, therefore,
18 denies the same.

19 62. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 62 of the Complaint and, therefore,
21 denies the same.

22 63. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 63 of the Complaint and, therefore,
24 denies the same.

25 64. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 64 of the Complaint and, therefore,
27 denies the same.

28 65. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 65 of the Complaint and, therefore,
2 denies the same.

3 66. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 66 of the Complaint and, therefore,
5 denies the same.

6 67. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 67 of the Complaint and, therefore,
8 denies the same.

9 68. To the extent the allegations of this paragraph are based upon documents,
10 including emails, the alleged documents are in writing and speak for themselves and
11 Defendant denies any characterization thereof. Defendant lacks knowledge or
12 information sufficient to form a belief as to the truth or accuracy of the allegations of
13 paragraph 68 of the Complaint and, therefore, denies the same.

14 69. Defendant lacks knowledge or information sufficient to form a belief as to
15 the truth or accuracy of the allegations of paragraph 69 of the Complaint and, therefore,
16 denies the same.

17 70. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 70 of the Complaint and, therefore,
19 denies the same.

20 71. The allegations of paragraph 71 state a conclusion of law to which no
21 response is required. To the extent a response is required, the allegations of this
22 paragraph are denied.

23 72. The allegations of paragraph 72 state a conclusion of law to which no
24 response is required. To the extent a response is required, the allegations of this
25 paragraph are denied.

26 73. The allegations of paragraph 73 state a conclusion of law to which no
27 response is required. To the extent a response is required, the allegations of this
28 paragraph are denied. Defendant lacks further knowledge or information sufficient to

1 form a belief as to the truth or accuracy of the allegations of paragraph 73 of the
2 Complaint and, therefore, denies the same.

3 74. Defendant admits the allegations contained in paragraph 74 of the
4 Complaint.

5 75. Defendant admits the allegations contained in paragraph 75 of the
6 Complaint.

7 76. Defendant lacks knowledge or information sufficient to form a belief as to
8 the truth or accuracy of the allegations of paragraph 76 of the Complaint and, therefore,
9 denies the same.

10 77. Defendant lacks knowledge or information sufficient to form a belief as to
11 the truth or accuracy of the allegations of paragraph 77 of the Complaint and, therefore,
12 denies the same.

13 78. Defendant lacks knowledge or information sufficient to form a belief as to
14 the truth or accuracy of the allegations of paragraph 78 of the Complaint and, therefore,
15 denies the same.

16 79. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 79 of the Complaint and, therefore,
18 denies the same.

19 80. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 80 of the Complaint and, therefore,
21 denies the same.

22 81. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 81 of the Complaint and, therefore,
24 denies the same.

25 82. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 82 of the Complaint and, therefore,
27 denies the same.

28 83. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 83 of the Complaint and, therefore,
2 denies the same.

3 84. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 84 of the Complaint and, therefore,
5 denies the same.

6 85. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 85 of the Complaint and, therefore,
8 denies the same.

9 **Land at Fagaiofu, Samoa and Version of Deeds**

10 86. Defendant lacks knowledge or information sufficient to form a belief as to
11 the truth or accuracy of the allegations of paragraph 86 of the Complaint and, therefore,
12 denies the same.

13 87. Defendant lacks knowledge or information sufficient to form a belief as to
14 the truth or accuracy of the allegations of paragraph 87 of the Complaint and, therefore,
15 denies the same.

16 88. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 88 of the Complaint and, therefore,
18 denies the same.

19 89. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 89 of the Complaint and, therefore,
21 denies the same.

22 90. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 90 of the Complaint and, therefore,
24 denies the same.

25 91. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 91 of the Complaint and, therefore,
27 denies the same.

28 92. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 92 of the Complaint and, therefore,
2 denies the same.

3 93. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 93 of the Complaint and, therefore,
5 denies the same.

6 94. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 94 of the Complaint and, therefore,
8 denies the same.

9 95. Defendant lacks knowledge or information sufficient to form a belief as to
10 the truth or accuracy of the allegations of paragraph 95 of the Complaint and, therefore,
11 denies the same.

12 96. Defendant lacks knowledge or information sufficient to form a belief as to
13 the truth or accuracy of the allegations of paragraph 96 of the Complaint and, therefore,
14 denies the same.

15 97. Defendant lacks knowledge or information sufficient to form a belief as to
16 the truth or accuracy of the allegations of paragraph 97 of the Complaint and, therefore,
17 denies the same.

18 98. Defendant lacks knowledge or information sufficient to form a belief as to
19 the truth or accuracy of the allegations of paragraph 98 of the Complaint and, therefore,
20 denies the same.

21 99. Defendant lacks knowledge or information sufficient to form a belief as to
22 the truth or accuracy of the allegations of paragraph 99 of the Complaint and, therefore,
23 denies the same.

24 100. Defendant lacks knowledge or information sufficient to form a belief as to
25 the truth or accuracy of the allegations of paragraph 100 of the Complaint and, therefore,
26 denies the same.

27 101. Defendant lacks knowledge or information sufficient to form a belief as to
28 the truth or accuracy of the allegations of paragraph 101 of the Complaint and, therefore,

1 denies the same.

2 102. Defendant lacks knowledge or information sufficient to form a belief as to
3 the truth or accuracy of the allegations of paragraph 102 of the Complaint and, therefore,
4 denies the same.

5 103. Defendant lacks knowledge or information sufficient to form a belief as to
6 the truth or accuracy of the allegations of paragraph 103 of the Complaint and, therefore,
7 denies the same.

8 104. Defendant lacks knowledge or information sufficient to form a belief as to
9 the truth or accuracy of the allegations of paragraph 104 of the Complaint and, therefore,
10 denies the same.

11 105. Defendant lacks knowledge or information sufficient to form a belief as to
12 the truth or accuracy of the allegations of paragraph 105 of the Complaint and, therefore,
13 denies the same.

14 106. Defendant lacks knowledge or information sufficient to form a belief as to
15 the truth or accuracy of the allegations of paragraph 106 of the Complaint and, therefore,
16 denies the same.

17 107. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 107 of the Complaint and, therefore,
19 denies the same.

20 108. Defendant lacks knowledge or information sufficient to form a belief as to
21 the truth or accuracy of the allegations of paragraph 108 of the Complaint and, therefore,
22 denies the same.

23 109. Defendant lacks knowledge or information sufficient to form a belief as to
24 the truth or accuracy of the allegations of paragraph 109 of the Complaint and, therefore,
25 denies the same.

26 110. Defendant lacks knowledge or information sufficient to form a belief as to
27 the truth or accuracy of the allegations of paragraph 110 of the Complaint and, therefore,
28 denies the same.

1 111. Defendant lacks knowledge or information sufficient to form a belief as to
2 the truth or accuracy of the allegations of paragraph 111 of the Complaint and, therefore,
3 denies the same.

4 112. Defendant lacks knowledge or information sufficient to form a belief as to
5 the truth or accuracy of the allegations of paragraph 112 of the Complaint and, therefore,
6 denies the same.

7 113. Defendant lacks knowledge or information sufficient to form a belief as to
8 the truth or accuracy of the allegations of paragraph 113 of the Complaint and, therefore,
9 denies the same.

10 114. Defendant lacks knowledge or information sufficient to form a belief as to
11 the truth or accuracy of the allegations of paragraph 114 of the Complaint and, therefore,
12 denies the same.

13 115. Defendant lacks knowledge or information sufficient to form a belief as to
14 the truth or accuracy of the allegations of paragraph 115 of the Complaint and, therefore,
15 denies the same.

16 116. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 116 of the Complaint and, therefore,
18 denies the same.

19 117. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 117 of the Complaint and, therefore,
21 denies the same.

22 118. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 118 of the Complaint and, therefore,
24 denies the same.

25 119. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 119 of the Complaint and, therefore,
27 denies the same.

28 120. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 120 of the Complaint and, therefore,
2 denies the same.

3 121. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 121 of the Complaint and, therefore,
5 denies the same.

6 122. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 122 of the Complaint and, therefore,
8 denies the same.

9 123. Defendant lacks knowledge or information sufficient to form a belief as to
10 the truth or accuracy of the allegations of paragraph 123 of the Complaint and, therefore,
11 denies the same.

12 124. Defendant lacks knowledge or information sufficient to form a belief as to
13 the truth or accuracy of the allegations of paragraph 124 of the Complaint and, therefore,
14 denies the same.

15 125. Defendant lacks knowledge or information sufficient to form a belief as to
16 the truth or accuracy of the allegations of paragraph 125 of the Complaint and, therefore,
17 denies the same.

18 126. Defendant lacks knowledge or information sufficient to form a belief as to
19 the truth or accuracy of the allegations of paragraph 126 of the Complaint and, therefore,
20 denies the same.

21 127. Defendant lacks knowledge or information sufficient to form a belief as to
22 the truth or accuracy of the allegations of paragraph 127 of the Complaint and, therefore,
23 denies the same.

24 128. Defendant lacks knowledge or information sufficient to form a belief as to
25 the truth or accuracy of the allegations of paragraph 128 of the Complaint and, therefore,
26 denies the same.

27 129. Defendant lacks knowledge or information sufficient to form a belief as to
28 the truth or accuracy of the allegations of paragraph 129 of the Complaint and, therefore,

1 denies the same.

2 130. Defendant lacks knowledge or information sufficient to form a belief as to
3 the truth or accuracy of the allegations of paragraph 130 of the Complaint and, therefore,
4 denies the same.

5 131. Defendant lacks knowledge or information sufficient to form a belief as to
6 the truth or accuracy of the allegations of paragraph 131 of the Complaint and, therefore,
7 denies the same.

8 132. Defendant lacks knowledge or information sufficient to form a belief as to
9 the truth or accuracy of the allegations of paragraph 132 of the Complaint and, therefore,
10 denies the same.

11 133. Defendant lacks knowledge or information sufficient to form a belief as to
12 the truth or accuracy of the allegations of paragraph 133 of the Complaint and, therefore,
13 denies the same.

14 134. Defendant lacks knowledge or information sufficient to form a belief as to
15 the truth or accuracy of the allegations of paragraph 134 of the Complaint and, therefore,
16 denies the same.

17 135. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 135 of the Complaint and, therefore,
19 denies the same.

20 136. Defendant lacks knowledge or information sufficient to form a belief as to
21 the truth or accuracy of the allegations of paragraph 136 of the Complaint and, therefore,
22 denies the same.

23 137. Defendant lacks knowledge or information sufficient to form a belief as to
24 the truth or accuracy of the allegations of paragraph 137 of the Complaint and, therefore,
25 denies the same.

26 138. Defendant lacks knowledge or information sufficient to form a belief as to
27 the truth or accuracy of the allegations of paragraph 138 of the Complaint and, therefore,
28 denies the same.

1 139. Defendant lacks knowledge or information sufficient to form a belief as to
2 the truth or accuracy of the allegations of paragraph 139 of the Complaint and, therefore,
3 denies the same.

4 140. Defendant lacks knowledge or information sufficient to form a belief as to
5 the truth or accuracy of the allegations of paragraph 140 of the Complaint and, therefore,
6 denies the same.

7 141. Defendant lacks knowledge or information sufficient to form a belief as to
8 the truth or accuracy of the allegations of paragraph 141 of the Complaint and, therefore,
9 denies the same.

10 142. Defendant lacks knowledge or information sufficient to form a belief as to
11 the truth or accuracy of the allegations of paragraph 142 of the Complaint and, therefore,
12 denies the same.

13 143. Defendant lacks knowledge or information sufficient to form a belief as to
14 the truth or accuracy of the allegations of paragraph 143 of the Complaint and, therefore,
15 denies the same.

16 144. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 144 of the Complaint and, therefore,
18 denies the same.

19 145. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 145 of the Complaint and, therefore,
21 denies the same.

22 146. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 146 of the Complaint and, therefore,
24 denies the same.

25 147. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 147 of the Complaint and, therefore,
27 denies the same.

28 148. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 148 of the Complaint and, therefore,
2 denies the same.

3 149. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 149 of the Complaint and, therefore,
5 denies the same.

6 150. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 150 of the Complaint and, therefore,
8 denies the same.

9 151. Defendant lacks knowledge or information sufficient to form a belief as to
10 the truth or accuracy of the allegations of paragraph 151 of the Complaint and, therefore,
11 denies the same.

12 152. Defendant lacks knowledge or information sufficient to form a belief as to
13 the truth or accuracy of the allegations of paragraph 152 of the Complaint and, therefore,
14 denies the same.

15 153. Defendant lacks knowledge or information sufficient to form a belief as to
16 the truth or accuracy of the allegations of paragraph 153 of the Complaint and, therefore,
17 denies the same.

18 154. Defendant lacks knowledge or information sufficient to form a belief as to
19 the truth or accuracy of the allegations of paragraph 154 of the Complaint and, therefore,
20 denies the same.

21 155. Defendant lacks knowledge or information sufficient to form a belief as to
22 the truth or accuracy of the allegations of paragraph 155 of the Complaint and, therefore,
23 denies the same.

24 156. Defendant lacks knowledge or information sufficient to form a belief as to
25 the truth or accuracy of the allegations of paragraph 156 of the Complaint and, therefore,
26 denies the same.

27 157. Defendant lacks knowledge or information sufficient to form a belief as to
28 the truth or accuracy of the allegations of paragraph 157 of the Complaint and, therefore,

1 denies the same.

2 158. Defendant lacks knowledge or information sufficient to form a belief as to
3 the truth or accuracy of the allegations of paragraph 158 of the Complaint and, therefore,
4 denies the same.

5 159. Defendant lacks knowledge or information sufficient to form a belief as to
6 the truth or accuracy of the allegations of paragraph 159 of the Complaint and, therefore,
7 denies the same.

8 160. Defendant lacks knowledge or information sufficient to form a belief as to
9 the truth or accuracy of the allegations of paragraph 160 of the Complaint and, therefore,
10 denies the same.

11 161. Defendant lacks knowledge or information sufficient to form a belief as to
12 the truth or accuracy of the allegations of paragraph 161 of the Complaint and, therefore,
13 denies the same.

14 162. Defendant lacks knowledge or information sufficient to form a belief as to
15 the truth or accuracy of the allegations of paragraph 163 of the Complaint and, therefore,
16 denies the same.

17 163. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 163 of the Complaint and, therefore,
19 denies the same.

20 164. Defendant lacks knowledge or information sufficient to form a belief as to
21 the truth or accuracy of the allegations of paragraph 164 of the Complaint and, therefore,
22 denies the same.

23 165. Defendant lacks knowledge or information sufficient to form a belief as to
24 the truth or accuracy of the allegations of paragraph 165 of the Complaint and, therefore,
25 denies the same.

26 166. Defendant lacks knowledge or information sufficient to form a belief as to
27 the truth or accuracy of the allegations of paragraph 166 of the Complaint and, therefore,
28 denies the same.

1 167. Defendant lacks knowledge or information sufficient to form a belief as to
2 the truth or accuracy of the allegations of paragraph 167 of the Complaint and, therefore,
3 denies the same.

4 168. Defendant lacks knowledge or information sufficient to form a belief as to
5 the truth or accuracy of the allegations of paragraph 168 of the Complaint and, therefore,
6 denies the same.

7 169. Defendant lacks knowledge or information sufficient to form a belief as to
8 the truth or accuracy of the allegations of paragraph 169 of the Complaint and, therefore,
9 denies the same.

10 170. Defendant lacks knowledge or information sufficient to form a belief as to
11 the truth or accuracy of the allegations of paragraph 170 of the Complaint and, therefore,
12 denies the same.

13 171. Defendant lacks knowledge or information sufficient to form a belief as to
14 the truth or accuracy of the allegations of paragraph 171 of the Complaint and, therefore,
15 denies the same.

16 172. Defendant lacks knowledge or information sufficient to form a belief as to
17 the truth or accuracy of the allegations of paragraph 172 of the Complaint and, therefore,
18 denies the same.

19 173. Defendant lacks knowledge or information sufficient to form a belief as to
20 the truth or accuracy of the allegations of paragraph 173 of the Complaint and, therefore,
21 denies the same.

22 174. Defendant lacks knowledge or information sufficient to form a belief as to
23 the truth or accuracy of the allegations of paragraph 174 of the Complaint and, therefore,
24 denies the same.

25 175. Defendant lacks knowledge or information sufficient to form a belief as to
26 the truth or accuracy of the allegations of paragraph 175 of the Complaint and, therefore,
27 denies the same.

28 176. Defendant lacks knowledge or information sufficient to form a belief as to

1 the truth or accuracy of the allegations of paragraph 176 of the Complaint and, therefore,
2 denies the same.

3 177. Defendant lacks knowledge or information sufficient to form a belief as to
4 the truth or accuracy of the allegations of paragraph 177 of the Complaint and, therefore,
5 denies the same.

6 178. Defendant lacks knowledge or information sufficient to form a belief as to
7 the truth or accuracy of the allegations of paragraph 178 of the Complaint and, therefore,
8 denies the same.

9 179. Defendant lacks knowledge or information sufficient to form a belief as to
10 the truth or accuracy of the allegations of paragraph 179 of the Complaint and, therefore,
11 denies the same.

12 180. Defendant lacks knowledge or information sufficient to form a belief as to
13 the truth or accuracy of the allegations of paragraph 180 of the Complaint and, therefore,
14 denies the same.

15 181. Defendant lacks knowledge or information sufficient to form a belief as to
16 the truth or accuracy of the allegations of paragraph 181 of the Complaint and, therefore,
17 denies the same.

18 182. Defendant lacks knowledge or information sufficient to form a belief as to
19 the truth or accuracy of the allegations of paragraph 182 of the Complaint and, therefore,
20 denies the same.

21 183. Defendant lacks knowledge or information sufficient to form a belief as to
22 the truth or accuracy of the allegations of paragraph 183 of the Complaint and, therefore,
23 denies the same.

24 184. Defendant lacks knowledge or information sufficient to form a belief as to
25 the truth or accuracy of the allegations of paragraph 184 of the Complaint and, therefore,
26 denies the same.

27 185. Defendant lacks knowledge or information sufficient to form a belief as to
28 the truth or accuracy of the allegations of paragraph 185 of the Complaint and, therefore,

1 denies the same.

2 186. Defendant lacks knowledge or information sufficient to form a belief as to
3 the truth or accuracy of the allegations of paragraph 186 of the Complaint and, therefore,
4 denies the same.

5 187. Defendant lacks knowledge or information sufficient to form a belief as to
6 the truth or accuracy of the allegations of paragraph 187 of the Complaint and, therefore,
7 denies the same.

8 188. Defendant lacks knowledge or information sufficient to form a belief as to
9 the truth or accuracy of the allegations of paragraph 188 of the Complaint and, therefore,
10 denies the same.

11 189. Defendant lacks knowledge or information sufficient to form a belief as to
12 the truth or accuracy of the allegations of paragraph 189 of the Complaint and, therefore,
13 denies the same.

14 190. Defendant lacks knowledge or information sufficient to form a belief as to
15 the truth or accuracy of the allegations of paragraph 190 of the Complaint and, therefore,
16 denies the same.

17 191. Defendant lacks knowledge or information sufficient to form a belief as to
18 the truth or accuracy of the allegations of paragraph 191 of the Complaint and, therefore,
19 denies the same.

20 192. There are no paragraphs numbered 192 through 199.

21 200. Defendant lacks knowledge or information sufficient to form a belief as to
22 the truth or accuracy of the allegations of paragraph 200 of the Complaint and, therefore,
23 denies the same.

24 **FIRST CAUSE OF ACTION**

25 **BREACH OF FIDUCIARY DUTY**

26 201. In response to the allegations contained herein, Defendant incorporates
27 herein by this reference his responses to paragraphs 1 through 200, inclusive, as
28 though fully set forth herein.

1 202. The allegations of this paragraph state a conclusion of law to which no
2 response is required. To the extent a response is required, the allegations of this
3 paragraph are denied.

4 203. The allegations of this paragraph state a conclusion of law to which no
5 response is required. To the extent a response is required, the allegations of this
6 paragraph are denied.

7 204. Defendant denies the allegations contained in paragraph 204 of the
8 Complaint.

9 **SECOND CAUSE OF ACTION**

10 **FRAUD-CONCEALMENT**

11 205. In response to the allegations contained herein, Defendant incorporates
12 herein by this reference his responses to paragraphs 1 through 204, inclusive, as
13 though fully set forth herein.

14 206. Defendant denies the allegations contained in paragraph 206 of the
15 Complaint.

16 207. Defendant denies the allegations contained in paragraph 207 of the
17 Complaint.

18 208. a. Defendant denies the allegations contained in paragraph 208a of the
19 Complaint.

20 209. b. Defendant denies the allegations contained in paragraph 209b of the
21 Complaint.

22 210. c. Defendant denies the allegations contained in paragraph 210c of the
23 Complaint.

24 211. e. Defendant admits that the Supreme Court of Samoa verified
25 Defendant as the sole owner of “Fagaiofu,” but lacks facts or information sufficient to
26 form a belief as to the truth or accuracy of the allegations of the balance of paragraph
27 211.e, and, therefore, denies them.

28 212. Defendant denies the allegations contained in paragraph 212 of the

1 Complaint.

2 213. The allegations of this paragraph state a conclusion of law to which no
3 response is required. To the extent a response is required, the allegations of this
4 paragraph are denied.

5 214. Defendant denies the allegations contained in paragraph 214 of the
6 Complaint.

7 215. Defendant lacks knowledge or information sufficient to form a belief as to
8 the truth or accuracy of the allegations of what material facts Plaintiff was or was not
9 aware of and would or would not have acted upon, and therefore denies the allegations of
10 paragraph 215 of the Complaint and specifically denies that Defendant engaged in any
11 deliberate wrongful conduct.

12 216. Defendant denies the allegations contained in paragraph 216 of the
13 Complaint.

14 **Statute of Limitations—Delayed Discovery**

15 217. The allegations contained in the first sentence of this paragraph state a
16 conclusion of law to which no response is required. To the extent a response is
17 required, the allegations of this paragraph are denied. Further, Defendant lacks
18 knowledge or information sufficient to form a belief as to the truth or accuracy of the
19 allegations of what documents or material facts Plaintiff was or was not aware of and
20 would or would not have acted upon, and did or did not act upon, and therefore denies the
21 allegations of paragraph 217 of the Complaint and specifically denies that Defendant
22 engaged in any wrongful conduct.

23
24 **SEPARATE SPECIAL AND AFFIRMATIVE DEFENSES**

25 For separate, special and affirmative defenses, Defendant alleges the following:

26 **FIRST AFFIRMATIVE DEFENSE**

27 Without admitting any of the allegations contained in Plaintiff's Complaint,
28 Defendant alleges that Plaintiff's Complaint fails to state a cause of action upon which

1 relief may be granted.

2 **SECOND AFFIRMATIVE DEFENSE**

3 Without admitting any of the allegations contained in Plaintiff's Complaint,
4 Defendant alleges that Plaintiff's Complaint is barred, in whole or in part, by the
5 applicable statutes of limitations.

6 **THIRD AFFIRMATIVE DEFENSE**

7 Without admitting any of the allegations contained in Plaintiff's Complaint,
8 Defendant alleges that Plaintiff's Complaint is barred, in whole or in part, by the
9 doctrine of laches.

10 **FOURTH AFFIRMATIVE DEFENSE**

11 Without admitting any of the allegations contained in Plaintiff's Complaint,
12 Defendant alleges that Plaintiff has waived any and all claims that may exist or have
13 existed against Defendant.

14 **FIFTH AFFIRMATIVE DEFENSE**

15 As Plaintiff has admitted within the complaint, another action is pending in
16 another jurisdiction and the parties are waiting for that Court's final ruling. As such,
17 this action should never have been filed, but at a minimum must be abated and/or
18 stayed pending the completion of the pending action.

19
20 **DEMAND FOR JURY**

21 Defendant hereby demands trial of this action by a jury.

22
23 **PRAAYER FOR RELIEF**

24 **WHEREFORE**, Defendant, Douglas Crane Kneubuhl aka Mike Kneubuhl
25 prays that the Court:

- 26 1. Grant judgment in his favor and against the Plaintiff;
27 2. Grant Defendant his costs and attorney's fees;
28 3. Grant such other relief, including but not limited to, an order abating

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and/or staying this action as is just and appropriate under the circumstances.

Dated: June 19, 2017

GLADYCH & ASSOCIATES, INC.

By: /s/ John A. Gladych
John A. Gladych, Esq.
Andrea A. Golan, Esq.
Attorneys for Defendant,
DOUGLAS CRANE KNEUBUHL aka
MIKE KNEUBUHL

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and am not a party to the within action. My business address is 1400 Bristol Street North, Suite 210, Newport Beach, CA 92660.

On **June 19, 2017** I served the within document(s) described as: **ANSWER OF DOUGLAS CRANE KNEUBUHL aka MIKE KNEUBUHL TO PLAINTIFF’S COMPLAINT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- BY PERSONAL SERVICE: I caused said document(s), to be hand-delivered by _____ to the parties at the address(es) listed on the attached Service List.
- BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED: I caused said documents, enclosed in sealed envelope(s), with postage fully prepaid, to be placed in the U.S. Mail at Newport Beach, California on the above date. I am readily familiar with the firm’s practice for collection and processing of mail. It is deposited with the U.S. Postal Service on the same day it is date stamped in the ordinary course of business.
- BY U.S. MAIL: I caused said documents, enclosed in sealed envelope(s), with postage fully prepaid, to be placed in the U.S. Mail at Newport Beach, California on the above date. I am readily familiar with the firm’s practice for collection and processing of mail. It is deposited with the U.S. Postal Service on the same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing set forth in this affidavit, addressed as listed above.
- By Overnight Courier: I caused such document(s) to be delivered by overnight courier (Federal Express) for next day delivery to the parties and at the addresses on the attached Service List.
- BY E-FILE & SERVE: I served the parties on the above date by electronic transmission through the Court’s CM/ECF electronic file and serve system pursuant to the Federal Rules of Civil Procedure, and Local Rules of the U.S. District Court, Central District of California.
A Notice of Electronic Filing was received indicating electronic service on registered CM/ECF users; all others were served as indicated above.

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Executed on June 19, 2017 at Newport Beach, California.

(X) (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

/s/ Janelle James
JANELLE JAMES

1 U.S.D.C., Central District of CA Case No.: 8:17-cv-00961
2 Frances K. Opelle v. Douglas Crane aka Mike Kneubuhl

3 **SERVICE LIST**

4 Frances K. Opelle 5 56-154 Puuluana Place, No. 57 6 Kahuku, Hawaii 96731 7 Tel: (808) 293-2606 8 Email: wopelle@yahoo.com	9 <i>In Pro Per</i>
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