

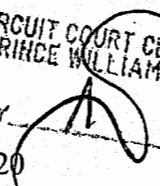
VIRGINIA:

IN THE PRINCE WILLIAM COUNTY CIRCUIT COURT

FILED

2018 NOV -6 PM 12:45

CIRCUIT COURT CLERKS OFFICE
PRINCE WILLIAM COUNTY, VA

BY  DEPUTY

JNJ,

Plaintiff,

v.

Case No.: CL18-8520

JORDAN D. BAIRD, et al.

Defendants.

ANSWER AND GROUNDS OF DEFENSE

COMES NOW, the defendant, JORDAN D. BAIRD, by counsel, and for his Answer and Grounds of Defense to the Complaint previously filed herein, states as follows:

1. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 1 of the Complaint and therefore denies same and demand strict proof thereof.
2. The allegations contained in paragraph 2 of the Complaint are not directed to this defendant.
3. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 3 of the Complaint and therefore denies same and demand strict proof thereof.
4. He admits that he was previously employed by "The Life Church" as referenced in paragraph 4 of the Complaint, but he denies all allegations and assertions relating to "these events" contained therein.
5. He admits that he was at one time employed as a worship directly by "The Life Church" and as a music instructor at "The Life Music Academy" as referenced in paragraph 5 of the Complaint, but he denies all allegations and assertions relating to "these events" contained therein.

6. He admits that his parents were the senior pastors of "The Life Church" as referenced in paragraph 6 of the Complaint, but he denies all allegations and assertions relating to "these events" contained therein.

7. He admits that his wife, Michelle Baird, was the director of "The Life Music Academy" as referenced in paragraph 7 of the Complaint, but he denies all allegations and assertions relating to "these events" contained therein.

8. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 8 of the Complaint and therefore denies same and demand strict proof thereof.

9. He admits that "The Life Music Academy" was operated on the grounds of "The Life Church" as referenced in paragraph 9 of the Complaint, but he denies all allegations and assertions relating to "these events" contained therein.

10. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 10 of the Complaint and therefore denies same and demand strict proof thereof.

11. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 11 of the Complaint and therefore denies same and demand strict proof thereof.

12. He admits the allegations contained in paragraph 12 of the Complaint.

13. He admits the allegations contained in paragraph 13 of the Complaint.

14. He denies the allegations contained in paragraph 14 of the Complaint.

15. He denies the allegations contained in paragraph 15 of the Complaint.

16. He denies the allegations contained in paragraph 16 of the Complaint.

17. He denies all allegations of tortious acts, sexual molestation and/or inappropriate conduct contained in paragraph 17 of the Complaint. The remaining allegations regarding *respondeat superior* set forth legal conclusions which do not require a response from him.

18. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 18 of the Complaint and therefore denies same and demand strict proof thereof.

19. He is without sufficient knowledge, information or belief to admit the allegations contained in paragraph 19 of the Complaint and therefore denies same and demand strict proof thereof.

20. He denies the allegations contained in paragraph 20 of the Complaint.

21. He denies the allegations contained in paragraph 21 of the Complaint.

22. He denies the allegations contained in paragraph 22 of the Complaint.

23. He denies the allegations contained in paragraph 23 of the Complaint.

24. He denies the allegations contained in paragraph 24 of the Complaint.

25. He denies the allegations contained in paragraph 25 of the Complaint.

26. He denies the allegations contained in paragraph 26 of the Complaint.

COUNT I

Proposing that JNJ, a Child Under the Age of 18, Touch Defendant's Sexual Parts

27. He incorporates by reference his responses to paragraphs 1 through 26 above, as if fully restated and set forth herein.

28. He denies the allegations contained in paragraph 28 of the Complaint.

29. He denies the allegations contained in paragraph 29 of the Complaint.

30. He denies the allegations contained in paragraph 30 of the Complaint.

31. He denies the allegations contained in paragraph 31 of the Complaint.

COUNT II

Intentionally Exposing His Sexual Parts to JNJ, a Child Under the Age of 18

32. He incorporates by reference his responses to paragraphs 1 through 31 above, as if fully restated and set forth herein.

33. He denies the allegations contained in paragraph 33 of the Complaint.
34. He denies the allegations contained in paragraph 34 of the Complaint.
35. He denies the allegations contained in paragraph 35 of the Complaint.
36. He denies the allegations contained in paragraph 36 of the Complaint.

COUNT III
Sexual Assault and Battery

37. He incorporates by reference his responses to paragraphs 1 through 36 above, as if fully restated and set forth herein.

38. He denies the allegations contained in paragraph 38 of the Complaint.
39. He denies the allegations contained in paragraph 39 of the Complaint.

COUNT IV

Taking Indecent Liberties with a Minor While in a Supervisory or Custodial Relationship in Violation of Virginia Code §18.2-370.1(A)

40. He incorporates by reference his responses to paragraphs 1 through 39 above, as if fully restated and set forth herein.

41. He denies the allegations contained in paragraph 41 of the Complaint.
42. He denies the allegations contained in paragraph 42 of the Complaint.
43. He denies the allegations contained in paragraph 43 of the Complaint.

44. Defendant denies all allegations of sexual molestation, sexual abuse, sexual battery, sexual assault, indecent liberties, inappropriate and/or unlawful conduct, and breach of code, duty and/or statute not heretofore specifically admitted.

45. The defendant denies that the plaintiff was damaged to the extent alleged and demands strict proof of all claimed damages.

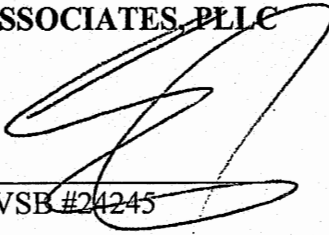
46. The defendant avers that the plaintiff has failed to properly mitigate her damages, if any.

47. The defendant denies that he is liable to the plaintiff under any theory of recovery for any amount whatsoever.

WHEREFORE, having fully answered, the defendant, JORDAN D. BAIRD, by counsel, respectfully requests that judgment be entered in his favor, together with an award of his costs and expenses incurred herein.

Respectfully submitted,
JORDAN D. BAIRD
By Counsel

SHERIDAN, PERSIAN & ASSOCIATES, PLLC



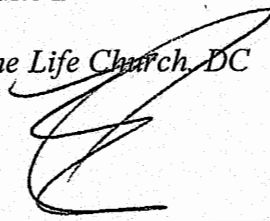
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Counsel for Defendant Jordan D. Baird

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was sent via facsimile & email, this 6th day of November, 2018 to:

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