



Andrea V. Arnold
1375 E. 9th Street, Suite 2250
Cleveland, Ohio 44114
Andrea.Arnold@lewisbrisbois.com
Direct: 216.298.1273

June 8, 2022

VIA ELECTRONIC FILING

Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215-3793
Facsimile: 614-466-2753

Re: Lisa Amspaugh v. All My Sons Moving & Storage
Case No. 22-532-TR-CSS

All My Sons Moving & Storage (“All My Sons”), by and through undersigned counsel, and for its Answer to the Complaint filed by Lisa Amspaugh (“Ms. Amspaugh”), states as follows:

The Complaint involves a January 8, 2022 move in which Ms. Amspaugh used All My Sons’ moving services. The origin of the move was 5459 York County Road, Columbus, Ohio 43221 to 4284 Spice Market, North Columbus, Ohio 43221. All My Sons denies that it engaged in any fraudulent and/or illegal business practices. Furthermore, All My Sons denies that it violated any Ohio Administrative Code provisions, engaged in any deceitful acts, or engaged in any unconscionable acts. All My Sons’ general denial is made in good faith. All My Sons denies each and every allegation not specifically admitted herein to be true.

All My Sons pleads the following affirmative and other defenses in response to Ms. Amspaugh's Complaint. By pleading these affirmative defenses, All My Sons does not assume the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Ms. Amspaugh. In addition, nothing stated herein is intended or shall be construed as a concession that any particular issue or subject matter is relevant to Ms. Amspaugh's allegations.

1. Failure to set forth reasonable grounds for the Complaint.
2. Satisfaction of the complaint or settlement of the case.
3. All My Sons did not breach any legal duty to Ms. Amspaugh
4. Ms. Amspaugh has not sustained any damages proximately or actually caused by All My Sons.
5. Ms. Amspaugh's allegations are barred, in whole or in part, by the doctrines of waiver, estoppel, ratification, acquiescence, accord, satisfaction, and/or unclean hands.
6. All My Sons reserves the right to assert additional affirmative defenses at such time and to such extent as is warranted as the developments in the case continues.

Respectfully submitted,

/s/ Andrea V. Arnold

Andrea V. Arnold (0099455)
Lewis Brisbois Bisgaard & Smith, LLP
1375 E. 9th Street, Suite 2250
Cleveland, Ohio 44114
Phone: 216.298.1273
Fax: 216.344.9421
Andrea.Arnold@lewisbrisbois.com

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June 2022, the foregoing was filed electronically with the Public Utilities Commission of Ohio, and a copy of the foregoing has been sent to Lisa Amspaugh at the following address:

Lisa Amspaugh
6820 Wonder Way
Tipp City, Ohio 45371

/s/ Andrea V. Arnold
Andrea V. Arnold (0099455)

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

6/8/2022 5:19:29 PM

in

Case No(s). 22-0532-TR-CSS

Summary: Answer of All My Sons Moving & Storage electronically filed by Ms.
Andrea V. Arnold on behalf of All My Sons Moving & Storage