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DOCKETING DIVISION
Public Utilities Commission of Ohio

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

BOB ZAMES, et. al,)	
Complainants)	
)	Case No. 96-289-TP-CSS
vs.)	
)	
AMERITECH OHIO)	
Respondent.)	

ANSWER OF AMERITECH OHIO

Now comes Ameritech Ohio, Respondent herein, as required by Ohio Admin. Code §4901-9-01(A) and without waiving its right to file any legally sufficient Motion to Dismiss, for its Answer states as follows:

FIRST DEFENSE

1. In response to the first unnumbered paragraph of the Complaint, Respondent admits that in 1995 Complainant Bob Zames placed an order for a White Pages listing in Respondent's Lake County Area Directory, that a dispute between Complainants and Re/Max International, Inc. was the subject of a federal court case to which Respondent was not a party. Further answering Respondent admits that an order did issue from said U. S. District Court and said order speaks for itself. Respondent denies that any order of the federal court ordered Respondent to do anything and the only parties directly ordered to act were those who were parties to that litigation. Respondent expressly denies any wrongdoing in connection with the federal court case or with regard to any transaction in which Complainants were involved. Any

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allegations contained in the first unnumbered paragraph of the Complaint, not expressly admitted, are denied or denied for want of knowledge.

2. In response to the second and third unnumbered paragraphs of the Complaint Respondent expressly denies any wrongdoing and states that at all time relevant herein it fulfilled its public utility obligations to Complainants. Any allegations contained in the second and third unnumbered paragraphs of the Complaint, not expressly admitted, are denied or denied for want of knowledge.

SECOND DEFENSE

3. Respondent avers that to the extent the within Complaint seeks relief in the form of money damages the requested relief is beyond the jurisdiction of this Honorable Commission.

THIRD DEFENSE

4. Respondent avers that it has breached no legal duty owing Complainants and that its service at all relevant times has been in full accordance with all applicable provisions of law and accepted standards within the telephone industry.

FOURTH DEFENSE

5. Respondent avers that the within Complaint fails to state reasonable grounds for a proceeding thereon as required by Ohio Rev. Code §4905.26 and fails to state a claim upon which relief may be granted.

FIFTH DEFENSE

6. Any claims based upon allegations that Respondent failed to obey a court order are barred by the doctrine of *res judicata*.

WHEREFORE, having fully answered and set forth its defenses, Respondent respectfully requests that the within complaint be dismissed.

Respectfully submitted,

AMERITECH OHIO

By William H. Hunt/mlc
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CERTIFICATE OF SERVICE

A copy of the foregoing Answer of Ameritech Ohio, Respondent herein, has been served upon Edward W. Cochran, counsel for Complainants herein, 2872 Broxton Road, Shaker Heights, Ohio 44120 by regular U.S. mail, postage prepaid, this 11th day of April 1996.

William H. Hunt/mlc
William H. Hunt