

admissions pertaining to those individual cases are made only on behalf of the Defendant magistrate who was assigned to the case.

3. Paragraph 1 is denied.

4. Answering Paragraphs 2 and 3, these Defendants would refer the Court to the pertinent court records for the best evidence of what occurred. Except as expressly admitted, Paragraphs 2 and 3 are denied.

5. The first sentence of Paragraph 4 is denied as stated. Answering the remainder of Paragraph 4, these Defendants would refer the Court to pertinent county records for records for the best evidence of what occurred. Except as expressly admitted, Paragraph 4 is denied.

6. Paragraph 5 is denied.

7. Paragraphs 6 through 8 are denied.

8. Paragraph 9 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

9. Paragraph 10 is denied.

10. Paragraph 11 pertains to other Defendants, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

11. The first two sentences of Paragraph 12 are denied. Answering the third and last sentence of Paragraph 12, these Defendants would refer the Court to pertinent county records for the best evidence of what occurred. Except as expressly admitted, Paragraph 12 is denied.

12. Paragraph 13 is denied.

13. The first sentence of Paragraph 14 is denied. The remainder of Paragraph 14 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

14. Paragraph 15 is denied for lack of information.

15. Paragraph 16 is denied.

16. Answering the first sentence of Paragraph 17, these Defendants would allege that Plaintiffs Goodwin and Wright are subject to appropriate sanctions until they come into compliance with outstanding legal requirements. The second sentence of Paragraph 17 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

17. Answering Paragraph 18, it is denied that these Defendants violated any legal rights of Plaintiffs. These Defendants deny for lack of information the allegations of Paragraph 18 pertaining to alleged adverse effects on Plaintiffs. The second and last sentence of Paragraph 18 is merely descriptive of Plaintiffs' allegations, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

18. Answering Paragraphs 19 through 25, these Defendants know only such information about the individual Plaintiffs as is to be found in county records. To the extent the allegations of those paragraphs set forth information not found in county records, such allegations are denied for lack of information.

19. Paragraph 26 pertains to other Defendants, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

20. The first two sentences of Paragraph 27 are admitted. Answering the third sentence of Paragraph 27, these Defendants would refer the Court to applicable statutes and other legal authorities for the best evidence of the duties of the Chief Judge for Administrative Purposes of the Summary Courts. The fourth sentence of Paragraph 27 is denied. The fifth sentence of Paragraph 27 is admitted. The sixth and seventh sentences of Paragraph 27 are merely descriptive of Plaintiffs' allegations, and require neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

21. The first three sentences of Paragraph 28 are admitted. The fourth sentence of Paragraph 28 is denied. The fifth sentence of Paragraph 28 is admitted. The sixth and seventh sentences of Paragraph 28 are merely descriptive of Plaintiffs' allegations, and require neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

22. The first sentence of Paragraph 29 is admitted. The second and third sentences of Paragraph 29 are denied. The fourth sentence of Paragraph 29 is merely descriptive of Plaintiff Goodwin's allegations, and require neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

23. The first two sentences of Paragraph 30 are admitted. Answering the third sentence of Paragraph 30, these Defendants would refer the Court to applicable statutes and other legal authorities for the best evidence of the duties of the Associate Chief Judge for Administrative Purposes of the Summary Courts. The fourth sentence of Paragraph 30 is denied. The fifth sentence of Paragraph 30 is admitted. The sixth sentence of Paragraph 30 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

24. Paragraphs 31 and 32 pertain to other Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

25. Paragraph 33 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

26. Paragraph 34 is merely descriptive of Plaintiffs' allegations, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

27. Paragraphs 35 through 37 set forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

28. Answering Paragraphs 38 and 39, these Defendants would refer the Court to the census records therein cited for the best evidence of their contents. Except as expressly admitted, Paragraphs 38 and 39 are denied.

29. Paragraph 40, which is essentially speculative, is denied for lack of information.

30. Answering Paragraph 41, these Defendants would refer the Court to pertinent county records for the best evidence of the matters therein alleged. Except as expressly admitted, Paragraph 41 is denied.

31. Paragraph 42 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

32. Answering Paragraphs 43 through 46, these Defendants would refer the Court to the pertinent county records therein referenced for the best evidence of their contents. Except as expressly admitted, Paragraphs 40 through 43 are denied.

33. Paragraphs 47 through 65 pertain to other Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

34. Answering Paragraphs 66 through 73, these Defendants would refer the Court to the documents therein referenced for the best evidence of their contents. Except as expressly admitted, Paragraphs 66 through 73 are denied.

35. Paragraphs 74 through 79 pertain to other Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to

establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

36. Answering Paragraphs 80 through 86, these Defendants would refer the Court to the June 28, 2017 Order of Chief Justice Beatty, providing for Chief Judges for Administrative Purposes of the Summary Courts, for the best evidence of the matters alleged in those paragraphs.

37. Paragraph 87 is denied.

38. Paragraphs 88 through 90 are denied.

39. Answering Paragraph 91, it is admitted that the court collection fee is charged, but these Defendants would show that the fee is imposed by state law. The remainder of Paragraph 91 is denied. Except as expressly admitted, Paragraph 91 is denied.

40. Paragraphs 92 through 99 are denied.

41. Paragraphs 100 and 101 are denied for lack of information.

42. Paragraphs 102 through 105 are denied.

43. Answering Paragraph 106, these Defendants would show that in cases involving trial in absentia or the issuance of bench warrants, the criminal defendant is by definition not before the court, so the notification therein referenced is not possible. Except as expressly admitted, Paragraph 106 is denied.

44. Paragraphs 107 through 109 are denied.

45. Paragraphs 110 and 111 are denied.

46. Answering the first sentence of Paragraph 112, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters referenced therein. The remainder of Paragraph 112 is denied.

47. Answering the first sentence of Paragraph 113, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters referenced therein. The remainder of Paragraph 113 is denied.

48. Paragraph 114 is denied.

49. Answering the first sentence of Paragraph 115, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters referenced therein. The second sentence of Paragraph 115 is admitted, because these Defendants are not aware of any noncompliance of the type referenced therein. Except as expressly admitted, Paragraph 115 is denied.

50. Answering the first sentence of Paragraph 116, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters referenced therein. Answering the second sentence of Paragraph 116, these Defendants deny that they have the authority to make the kinds of decisions referenced therein. Except as expressly admitted, Paragraph 116 is denied.

51. Paragraph 117 is denied.

52. Answering Paragraph 118, these Defendants would refer the Court to pertinent provisions of state law and the Bench Book for the best evidence of the matters referenced therein. Except as expressly admitted, Paragraph 118 is denied.

53. Paragraph 119 is denied.

54. Answering the first sentence of Paragraph 120, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters referenced therein. The second and third sentences of Paragraph 120 are denied. Except as expressly admitted, Paragraph 120 is denied.

55. Paragraph 121 is denied.

56. Paragraphs 122 through 128 pertain to another Defendant, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

57. Paragraph 129 is denied.

58. Answering Paragraphs 130 and 131, these Defendants deny that the kinds of hearings referenced therein are never held. The remainder of Paragraphs 130 and 131 are denied.

59. Answering Paragraph 132, these Defendants would refer the Court to pertinent provisions of state law for the best evidence of the matters alleged therein. Except as expressly admitted, Paragraph 132 is denied.

60. Paragraphs 133 and 134 are denied.

61. Paragraph 135 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

62. The first sentence of Paragraph 136 is denied. The second sentence of Paragraph 136 is denied for lack of information.

63. Paragraphs 137 through 140 are denied for lack of information.

64. Answering Paragraph 141, these Defendants would refer the Court to the ticket therein referenced for the best evidence of what occurred. Except as expressly admitted, Paragraph 141 is denied.

65. Paragraph 142 is admitted.

66. Paragraphs 143 and 144 are denied.

67. The first sentence of Paragraph 145 is admitted. Answering the second sentence of Paragraph 145, Judge Adams would advise that Plaintiff Brown was charged with driving under suspension, third offense, and was sentenced for that offense. Except as expressly admitted, Paragraph 145 is denied.

68. Paragraph 146 is denied.

69. The first two sentences of Paragraph 147 are denied for lack of information. The third sentence of Paragraph 147 is denied.

70. Paragraph 148 is denied.

71. Answering Paragraph 149, it is admitted that Judge Adams advised Ms. Brown, although not using the language in that paragraph, that she would require certain scheduled monthly payments in the amount of \$100 per month Except as expressly admitted, Paragraph 149 is denied.

72. Answering Paragraph 150, it is admitted that Judge Adams advised Ms. Brown of the possibility of incarceration if the fines were not paid according to the monthly schedule. Except as expressly admitted, Paragraph 150 is denied.

73. Answering Paragraph 151, it is admitted that Judge Adams did not specifically inquire into the matters therein alleged. However, Judge Adams did take into consideration Ms. Brown's ability to pay by setting the monthly payment at the low amount of \$100 per month. Except as expressly admitted, Paragraph 151 is denied.

74. Paragraph 152 is denied for lack of information.

75. Paragraph 153 is denied.

76. Paragraph 154 is denied.

77. Answering Paragraph 155, it is admitted that Ms. Brown signed the Scheduled Time Payment Agreement. Except as expressly admitted, Paragraph 155 is denied.

78. Answering Paragraph 156, these Defendants would refer the Court to the Scheduled Time Payment Agreement for the best evidence of its content. Judge Adams would advise that Plaintiff Brown was charged with driving under suspension, third offense, and was sentenced for that offense. Except as expressly admitted, Paragraph 156 is denied.

79. The first sentence of Paragraph 157 is denied. Answering the second sentence of Paragraph 157, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. Except as expressly admitted, Paragraph 157 is denied.

80. Paragraph 158 is denied.

81. Paragraph 159 is admitted.

82. Paragraphs 160 through 162 are denied for lack of information.

83. Answering Paragraph 163, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. Judge Adams would advise that Plaintiff Brown was charged with driving under suspension, third offense, and was sentenced for that offense. Except as expressly admitted, Paragraph 163 is denied.

84. Paragraphs 164 through 175 are denied for lack of information.

85. Paragraphs 176 through 185 are denied for lack of information.

86. Paragraph 186 is admitted.

87. Paragraph 187 is denied.

88. Answering the first sentence of Paragraph 188, these Defendants would refer the Court to the document referenced therein for the best evidence of its contents. The second sentence of Paragraph 188 is denied for lack of information.

89. Answering the first sentence of Paragraph 189, these Defendants would refer the Court to the document referenced therein for the best evidence of its contents. the second sentence of Paragraph 189 is denied.

90. Answering Paragraph 190, it is admitted that an address of some sort was entered on the Trial Information and Plea Sheet. The remainder of Paragraph 190 is denied for lack of information.

91. Paragraphs 191 and 192 are denied.

92. Answering the first two sentences of Paragraph 193, Judge Adams would show that she did engage in a colloquy with Ms. Darby regarding representation by counsel. The third sentence of Paragraph 193 is denied. Except as expressly admitted, Paragraph 193 is denied.

93. Paragraph 194 is denied.

94. Paragraph 195 is admitted.

95. Answering Paragraph 196, Judge Adams would show that she advised Ms. Darby that she had the option to pay a fine of \$1,000 or of serving 30 days in jail. Except as expressly admitted, Paragraph 196 is denied.

96. The first sentence of Paragraph 197 is admitted. The second sentence of Paragraph 197 is denied. Answering the third sentence of Paragraph 197, Judge Adams would show that Ms. Darby stated that she could pay the entire fine that day. Except as expressly admitted, Paragraph 197 is denied.

97. Answering Paragraph 198, it is admitted that Judge Adams asked Ms. Darby where she worked. It is further admitted that Judge Adams asked no other questions about Ms. Darby's ability to pay, because Ms. Darby had advised that she was able to pay the entire fine that day. Except as expressly admitted, Paragraph 198 is denied.

98. Answering Paragraph 199, it is denied that Judge Adams did not tell Ms. Darby the amount of the fine imposed. It is admitted that Judge Adams did not ask the referenced questions about Ms. Darby's ability to pay, because Ms. Darby had advised that she was able to pay the entire fine that day. Except as expressly admitted, Paragraph 199 is denied.

99. Paragraph 200 is denied.

100. The first two sentences of Paragraph 201 are admitted. Only so much of the third sentence of Paragraph 201 is admitted as alleges that Ms. Darby sought to show Judge Adams that she would try to pay the fine as soon as possible. Except as expressly admitted, Paragraph 201 is denied.

101. Only so much of Paragraph 202 is admitted as alleges that Ms. Darby was ordered to pay \$150 per month. Except as expressly admitted, Paragraph 202 is denied.

102. Paragraph 203 is admitted.

103. The first sentence of Paragraph 204 is denied for lack of information. Answering the second sentence of Paragraph 204, these Defendants would refer the Court to the document referenced therein for the best evidence of its contents. Except as expressly admitted, Paragraph 204 is denied.

104. The first sentence of Paragraph 205 is denied for lack of information. The second sentence of Paragraph 205 is admitted.

105. Paragraphs 206 and 207 are denied for lack of information.

106. Answering Paragraph 208, these Defendants would refer the Court to the bench warrant referenced therein for the best evidence of its contents. Except as expressly admitted, Paragraph 208 is denied.

107. Paragraphs 209 through 213 are denied for lack of information.

108. The first set of paragraphs numbered 214 through 221 (pp. 52-53) are denied for lack of information.

109. The second set of Paragraphs 214 through 219 (p. 53) are denied for lack of information.

110. The second set of Paragraphs 220 and 221 (pp. 53-54) are admitted.

111. Paragraph 222 is denied for lack of information.

112. Paragraphs 223 through 227 are denied.

113. Answering Paragraph 228, these Defendants would refer the Court to the pertinent court records for the best evidence of what occurred. Except as expressly admitted, Paragraph 228 is denied.

114. Answering Paragraph 229, Judge Reinhart would show that Ms. Johnson was given notice that her trial date would be September 22, 2016. Except as expressly admitted, Paragraph 229 is denied.

115. Answering Paragraph 230, these Defendants would refer the Court to the bench warrant referenced therein for the best evidence of what occurred. Except as expressly admitted, Paragraph 230 is denied.

116. Paragraphs 231 through 242 are denied for lack of information.

117. Answering Paragraphs 243 and 244, these Defendants would refer the Court to the pertinent court records for the best evidence of the matters therein alleged. Except as expressly admitted, Paragraphs 243 and 244 are denied.

118. Paragraph 245 is denied for lack of information.

119. Paragraphs 246 through 253 are denied for lack of information.

120. Answering Paragraph 254, these Defendants would refer the Court to the pertinent court records for the best evidence of what occurred. Except as expressly admitted, Paragraph 254 is denied.

121. Paragraph 255 is denied for lack of information.

122. Paragraphs 256 through 259 are denied.

123. Paragraph 260 is admitted.

124. Answering Paragraph 261, Judge Reinhart would show that Ms. Palacios was given notice that her trial date would be November 10, 2016. Except as expressly admitted, Paragraph 261 is denied.

125. Answering Paragraph 262, these Defendants would refer the Court to the bench warrant referenced therein for the best evidence of what occurred. Except as expressly admitted, Paragraph 262 is denied.

126. Paragraphs 263 through 278 are denied for lack of information.

127. Answering Paragraph 279, these Defendants would refer the Court to the pertinent court records for the best evidence of what occurred. Except as expressly admitted, Paragraph 279 is denied.

128. Paragraphs 280 through 321 are denied for lack of information.

129. The paragraphs numbered 222 and 223 on pp. 67-68 are denied for lack of information.

130. Paragraphs 322 through 325 are denied for lack of information.

131. Answering Paragraph 326, these Defendants would refer the Court to the pertinent court records for the best evidence of what occurred. Except as expressly admitted, Paragraph 326 is denied.

132. Answering Paragraph 327, Judge Reinhart would show that the pertinent records contain no evidence that the phone call referenced therein actually occurred. The remainder of Paragraph 327, except the reference to opening hours (which is admitted) is denied for lack of information. Except as expressly admitted, Paragraph 327 is denied.

133. Paragraph 328 is admitted. Neither Judge Reinhart nor Judge Adams presided over Mr. Goodwin's cases therein referenced.

134. Answering Paragraph 329, these Defendants would show that Mr. Goodwin was given notice that his trial date would be August 9, 2016. Except as expressly admitted, Paragraph 329 is denied.

135. Answering Paragraph 330, these Defendants would refer the Court to the bench warrant referenced therein for the best evidence of what occurred. Except as expressly admitted, Paragraph 330 is denied.

136. Paragraphs 331 through 333 are denied for lack of information.

137. The first sentence of Paragraph 334 is denied for lack of information. Answering the remainder of Paragraph 334, these Defendants would refer the Court to the ticket referenced therein for the best evidence of its contents. Except as expressly admitted, Paragraph 334 is denied.

138. Paragraphs 335 and 336 are denied for lack of information.

139. Paragraph 337 is admitted on information and belief.

140. Paragraph 338 is denied for lack of information.

141. Paragraph 339 is admitted.

142. Paragraphs 340 and 341 are denied.

143. Answering the first two sentences of Paragraph 342, these Defendants would refer the Court to pertinent court records for the best evidence of the matters therein alleged. The remainder of Paragraph 342 is denied.

144. The first sentence of Paragraph 343 is admitted. Answering the second sentence of Paragraph 343, it is admitted that Judge Adams advised Mr. Goodwin that incarceration was possible if he failed to comply with the payment plan, but it is denied that she “threatened” him.

145. Paragraphs 344 through 352 are denied for lack of information.

146. Paragraph 353 is admitted.

147. Paragraphs 354 is denied for lack of information.

148. Paragraph 355 is denied for lack of information. With respect to any amounts owed by Plaintiff Goodwin, these Defendants would refer the Court to the pertinent court records for the best evidence of the matters alleged therein. Except as expressly admitted, Paragraph 355 is denied.

149. Paragraph 356 is denied for lack of information.

150. Paragraphs 357 and 358 are denied for lack of information. With respect to any amounts paid by Plaintiff Goodwin, or owed by Plaintiff Goodwin, these Defendants would refer the Court to the pertinent court records for the best evidence of the matters alleged therein. Except as expressly admitted, Paragraphs 357 and 358 are denied.

151. Paragraph 359 is denied.

152. Paragraphs 360 through 362 are denied for lack of information.

153. Paragraphs 363 and 364 are admitted on information and belief.

154. Paragraph 365 is denied for lack of information.

155. Answering Paragraph 366, these Defendants would refer the Court to pertinent court records for the best evidence of the matters therein alleged. Except as expressly admitted, Paragraph 366 is denied.

156. Paragraphs 367 through 369 are denied for lack of information.

157. The first sentence of Paragraph 370 is denied for lack of information. Answering the remainder of Paragraph 370, these Defendants would refer the Court to pertinent court records for the best evidence of the matters therein alleged. Except as expressly admitted, Paragraph 370 is denied.

158. Paragraphs 371 and 372 are denied for lack of information.

159. Paragraph 373 is admitted.

160. Paragraphs 374 through 388 are denied for lack of information.

161. Answering Paragraph 389, these Defendants would show that Plaintiffs would not have been booked in the Detention Center if they had either paid the entire amount of the court fines and fees or attempted to make other arrangements. Except as expressly admitted, Paragraph 389 is denied.

162. Paragraphs 390 and 391 are denied.

163. Answering Paragraph 392, these Defendants would show that on information and belief, none of the named Plaintiffs requested to be taken before a judge after being arrested on a bench warrant. Except as expressly admitted, Paragraph 392 is denied.

164. Paragraph 393 is denied.

165. Paragraphs 394 through 398 are denied for lack of information.

166. Answering Paragraph 399, these Defendants would advise that Plaintiff Wright has no pending or ongoing proceedings in any Lexington County summary court. However, Mr.

Goodwin still owes over \$2,100 in fines for his DUS, 3rd offense, and as a result, it is denied that the Irmo Magistrate Court has completely concluded its proceedings concerning the DUS, 3rd offense, for which Mr. Goodwin was convicted and sentenced to fines and fees. The third sentence of Paragraph 399 is admitted on information and belief.

167. Answering Paragraph 400, these Defendants would allege on information and belief that Plaintiffs Goodwin and Wright both agreed to pay the court fines and fees that were outstanding. Except as expressly admitted, Paragraph 400 is denied.

168. The first sentence of Paragraph 401 is denied. The second sentence of Paragraph 401 is admitted on information and belief. The third sentence of Paragraph 401 is denied on information and belief.

169. Answering Paragraphs 402 through 409, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. Except as expressly admitted, Paragraphs 402 through 409 are denied.

170. Paragraph 410 consists of pure speculation, and is denied for lack of information.

171. Paragraph 411 is denied. The records do not disclose whether the persons in the records are indigent or not.

172. Answering Paragraphs 412 and 413, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. Except as expressly admitted, Paragraphs 412 and 413 are denied.

173. Answering Paragraph 414, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. These Defendants deny the inferences in Paragraph 414 which Plaintiff's counsel seek to draw from the records. Except as expressly admitted, Paragraph 414 is denied.

174. Paragraphs 415 through 419 are denied.

175. Paragraph 420 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and require neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

176. Paragraph 421 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

177. Paragraphs 422 and 423 are denied.

178. Paragraph 424 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

179. Paragraphs 425 and 426 are denied.

180. Answering Paragraph 427, these Defendants would refer the Court to the records therein referenced for the best evidence of their contents. These Defendants deny the inferences in Paragraph 427 which Plaintiff's counsel seek to draw from the records. Except as expressly admitted, Paragraph 427 is denied.

181. Paragraph 428 is admitted.

182. Paragraph 429 is denied for lack of information, except for the last sentence of that paragraph, which is denied.

183. Paragraph 430 is denied.

184. The first sentence of Paragraph 431 is denied. The remainder of Paragraph 431 is denied for lack of information.

185. Paragraph 432 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

186. Paragraphs 433 and 434 are denied for lack of information.

187. Paragraph 435 is denied.

188. Paragraphs 436 through 439 are admitted on information and belief.

189. Paragraph 440 is denied.

190. Paragraph 441, requesting a trial by jury, requires neither admission nor denial.

191. Answering Paragraph 442, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

192. Paragraph 443 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

193. Paragraph 444 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

194. The first sentence of Paragraph 445 is denied. The remainder of Paragraph 445 is denied for lack of information.

195. Answering Paragraphs 446 and 447, these Defendants would refer the Court to pertinent court records for the matters of record which are therein alleged. The remainder of Paragraphs 446 and 447 is denied for lack of information. Except as expressly admitted, Paragraphs 446 and 447 are denied.

196. The first sentence of Paragraph 448 is denied for lack of information. The second sentence of Paragraph 448 is denied.

197. Paragraph 449 is denied.

198. Paragraph 450 does not make allegations against these Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

199. Paragraphs 451 and 452 are denied.

200. Answering Paragraph 453, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

201. Paragraph 454 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

202. Paragraph 455 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

203. Paragraph 456 is denied.

204. Answering Paragraphs 457 and 458, these Defendants would refer the Court to pertinent court records for the matters of record which are therein alleged. The remainder of Paragraphs 457 and 458 is denied for lack of information. Except as expressly admitted, Paragraphs 457 and 458 are denied.

205. Paragraphs 459 through 462 pertain to other Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

206. Paragraphs 463 through 465 are denied.

207. Paragraph 466 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

208. The first sentence of Paragraph 467 is denied. The second sentence of Paragraph 467 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

209. Paragraph 468 is denied.

210. Answering Paragraph 469, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

211. Paragraph 470 is merely descriptive of the allegations of Plaintiffs Goodwin and Wright, and requires neither admission nor denial. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

212. Paragraph 471 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

213. Paragraphs 472 and 473 are denied.

214. Paragraph 474 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

215. The first sentence of Paragraph 475 is denied. The second sentence of Paragraph 475 is merely descriptive of Plaintiffs' allegations, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

216. Paragraph 476 is denied.

217. Answering Paragraph 477, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

218. Paragraph 478 is merely descriptive of Plaintiffs' allegations, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

219. Paragraph 479 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

220. Paragraphs 480 through 482 are denied.

221. Paragraph 483 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

222. Paragraph 484 is denied.

223. Paragraph 485 is merely descriptive of Plaintiffs' allegations, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

224. Answering Paragraph 486, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

225. Paragraph 487 is merely descriptive, and requires no response from these Defendants.

226. Paragraph 488 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

227. Paragraph 489 is denied.

228. Paragraphs 490 and 491 pertain to other Defendants, and as such require no response from these Defendants. To the extent, if any, that such allegations may attempt to

establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

229. Paragraphs 492 and 493 are denied.

230. Paragraph 494 is merely descriptive of the relief sought by Plaintiffs, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

231. Answering Paragraph 495, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

232. Paragraph 496 is merely descriptive, and requires no response from these Defendants.

233. Paragraph 497 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

234. Paragraphs 498 through 504 are denied.

235. Paragraph 505 pertains to another Defendant, and as such requires no response from these Defendants. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

236. Paragraph 506 is denied.

237. Paragraph 507 is merely descriptive of the relief sought by Plaintiffs, and requires neither admission nor denial. To the extent, if any, that such allegations may attempt to establish

liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

238. Answering Paragraph 508, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

239. Paragraph 509 is merely descriptive, and requires no response.

240. Paragraph 510 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

241. Answering Paragraph 511, these Defendants would refer the Court to pertinent court records for the matters of record which are therein alleged. The remainder of Paragraph 511 is denied for lack of information. Except as expressly admitted, Paragraph 511 is denied.

242. Paragraph 512 is denied.

243. The first two sentences of Paragraph 513 are denied. Answering the third sentence of Paragraph 513, it is admitted that Plaintiff Goodwin signed a Scheduled Time Payment Agreement. The remainder of Paragraph 513 is denied for lack of information.

244. The first sentence of Paragraph 514 is denied for lack of information. The second sentence of Paragraph 514 is denied.

245. Paragraph 515 is denied.

246. Answering Paragraph 516, these Defendants reiterate and reallege each and every paragraph and affirmative defense of this Answer as if set forth herein verbatim.

247. Paragraph 517 is merely descriptive, and requires no response.

248. Paragraph 518 sets forth legal conclusions which can neither be admitted nor denied. Insofar as such allegations attempt to establish liability on the part of these Defendants, these Defendants would deny same and demand strict proof thereof.

249. Answering Paragraph 519, these Defendants would refer the Court to pertinent court records for the matters of record which are therein alleged. The remainder of Paragraph 511 is denied for lack of information. Except as expressly admitted, Paragraph 511 is denied.

250. Paragraph 520 is denied.

251. Paragraph 521 is denied for lack of information.

252. Paragraphs 522 and 523 are denied.

253. Any remaining allegations of the Amended Complaint, including the Prayer for Relief on pp. 116-117, are denied.

FOR A THIRD DEFENSE

254. Plaintiffs' claims are barred by the United States Supreme Court's holding in *Heck v. Humphrey*.

FOR A FOURTH DEFENSE

255. Plaintiffs' claims are barred, in whole or in part, by operation of the Rooker-Feldman doctrine.

FOR A FIFTH DEFENSE

256. Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations.

FOR A SIXTH DEFENSE

257. Plaintiffs' claims are barred, in whole or in part, by absolute legislative immunity.

FOR A SEVENTH DEFENSE

258. Plaintiffs' claims are barred, in whole or in part, by res judicata or claim preclusion.

FOR AN EIGHTH DEFENSE

259. The Plaintiff's claims are barred, in whole or in part, by collateral estoppel or issue preclusion.

FOR A NINTH DEFENSE

260. The acts of which Plaintiffs complain are the result of valid judicial orders, and do not result from any action or inaction by Lexington County.

FOR A TENTH DEFENSE

261. To the extent that there are still ongoing criminal prosecutions involving any of the Plaintiffs, this action is barred by the abstention doctrine of *Younger v. Harris*.

FOR AN ELEVENTH DEFENSE

262. Plaintiffs' claims are barred, in whole or in part, by judicial or quasi-judicial immunity.

FOR A TWELFTH DEFENSE

263. Injunctive relief against these Defendants is barred under the terms of 42 U.S.C. § 1983.

FOR A THIRTEENTH DEFENSE

264. Attorneys' fees against these Defendants are not authorized by 42 U.S.C. § 1988.

FOR A TWELFTH DEFENSE

265. These Defendants are immune from suit pursuant to the Eleventh Amendment of the United States Constitution.

FOR A THIRTEENTH DEFENSE

266. Some or all of Plaintiffs' claims are barred by the Doctrine of Sovereign Immunity.

FOR A FOURTEENTH DEFENSE

267. These Defendants at no time violated any clearly established statutory or constitutional rights which were known or should have been known to them and therefore are entitled to qualified immunity from suit.

FOR A FIFTEENTH DEFENSE

268. Some or all Plaintiffs have waived any claim they may have had to challenge some or all of the matters of which they complain.

FOR A SIXTEENTH DEFENSE

269. Some or all Plaintiffs are estopped from challenging some or all of the matters of which they complain.

FOR A SEVENTEENTH DEFENSE

270. The claims of some or all Plaintiffs are moot, in whole or in part.

FOR AN EIGHTEENTH DEFENSE

271. Some or all of the claims of some or all Plaintiffs no longer present an existing case or controversy.

FOR A NINETEENTH DEFENSE

272. The Court lacks subject matter jurisdiction over some or all of the claims in this action.

WHEREFORE, having fully answered the Amended Complaint, these Defendants pray that the Amended Complaint be dismissed with prejudice, and for such other and further relief as the Court deems just and proper.

DAVIDSON & LINDEMANN, P.A.

BY: s/ Kenneth P. Woodington

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