

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re:

NO. 06-14202

COURT REPORTING INSTITUTE, INC.,

Debtor(s).

BANKRUPTCY ESTATE OF COURT
REPORTING INSTITUTE, INC., by and
through Michael B. McCarty, Bankruptcy
Trustee,

Plaintiff,

vs.

ALEN JANISCH, a single man; and KAI
MOLDSKRED and JOYCE MOLDSKRED,
husband and wife, and the marital community
Comprised thereof,

Defendant.

ADVERSARY NO. 07-01167

ANSWER TO PREFERENCE
COMPLAINT

DEFENDANT, ALEN JANISCH, ANSWERS AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S
PREFERENCE COMPLAINT

ANSWER TO PREFERENCE COMPLAINT - 1

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COMES NOW the Defendant, Alen Janisch, by and through his attorney of record,
Lawrence M. Blue, and in answer to Plaintiff's complaint admit and deny as follows:

1. In answer to paragraph 1 of Plaintiff's complaint, Defendant admits the same.
2. In answer to paragraph 2 of Plaintiff's complaint, Defendant admits the same.
3. In answer to paragraph 3 of Plaintiff's complaint, Defendant admits the same.
4. In answer to paragraph 4 of Plaintiff's complaint, Defendant admits the same.
5. In answer to paragraph 5 of Plaintiff's complaint, Defendant admits the same.
6. In answer to paragraph 6 of Plaintiff's complaint, Defendant admits the same.
7. In answer to paragraph 7 of Plaintiff's complaint, Defendant lacks sufficient information to form an answer.
8. In answer to paragraph 8 of Plaintiff's complaint, Defendant admits the same.
9. This paragraph does not exist in the original complaint.
10. In answer to paragraph 10 of Plaintiff's complaint, Defendant admits the same.
11. In answer to paragraph 11 of Plaintiff's complaint, Defendant admits the same.
12. In answer to paragraph 12 of Plaintiff's complaint, Defendant admits the same.
13. In answer to paragraph 13 of Plaintiff's complaint, Defendant admits the same.
14. In answer to paragraph 14 of Plaintiff's complaint, Defendant admits the same.
15. In answer to paragraph 15 of Plaintiff's complaint, Defendant admits the same.
16. In answer to paragraph 16 of Plaintiff's complaint, Defendant admits the same.
17. In answer to paragraph 17 of Plaintiff's complaint, Defendant denies the same.

- 1 18. In answer to paragraph 18 of Plaintiff's complaint, Defendant lacks sufficient
2 information to form and answer.
- 3 19. In answer to paragraph 19 of Plaintiff's complaint, Defendant lacks sufficient
4 information to form and answer.
- 5 20. In answer to paragraph 20 of Plaintiff's complaint, Defendant lacks sufficient
6 information to form and answer.
- 7 21. In answer to paragraph 21 of Plaintiff's complaint, Defendant denies the same.
- 8 22. In answer to paragraph 22 of Plaintiff's complaint, Defendant denies the same.
- 9 23. In answer to paragraph 23 of Plaintiff's complaint, Defendant denies the same.
- 10 24. In answer to paragraph 24 of Plaintiff's complaint, Defendant denies the same.
- 11 25. In answer to paragraph 25 of Plaintiff's complaint, Defendant admits the same.
- 12 26. In answer to paragraph 26 of Plaintiff's complaint, Defendant denies the same.
- 13 27. In answer to paragraph 27 of Plaintiff's complaint, Defendant denies the same.
- 14 28. In answer to paragraph 28 of Plaintiff's complaint, Defendant lacks sufficient
15 information to form and answer.
- 16 29. In answer to paragraph 29 of Plaintiff's complaint, Defendant denies the same.
- 17 30. In answer to paragraph 30 of Plaintiff's complaint, Defendant lacks sufficient
18 information to form and answer.
- 19 31. In answer to paragraph 31 of Plaintiff's complaint, Defendant denies the same.
- 20 32. In answer to paragraph 32 of Plaintiff's complaint, Defendant denies the same.
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24 DEFENDANT ALLEGES THE FOLLOWING AFFIRMATIVE DEFENSES:

- 1 1. Many of the exchanges set forth in Plaintiff's complaint were made in the ordinary
2 course of business and paid in the ordinary course of business.
- 3 2. Many of the exchanges set forth in the Plaintiff's complaint were contemporaneous
4 exchanges for value.
- 5 3. The diamond rings given to Defendant Moldskred were pledges of personal property as
6 security for outstanding loans.
- 7 4. Defendants reserve the right to amend this answer after discovery.

8 WHEREFORE Defendant prays for an order as follows:

- 9 1. That Plaintiff take nothing by reason of his complaint;
- 10 2. Dismissing Plaintiff's complaint with prejudice;
- 11 3. For its costs of suit herein;
- 12 4. For attorney fees, and;
- 13 5. For such other and further relief as this Court may deem just and proper.

14 DATED this 30th day of July, 2007.

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16 /s/ Lawrence M. Blue

17 Lawrence M. Blue, WSBA No. 29483.
18 Attorney for Defendant Alen Janisch