

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION

*

Plaintiff

*

v.

*

CIVIL ACTION

*

NO.: AMD 06cv1099

INFORMATION SEARCH, INC.,
et al.

*

*

Defendants

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* * * * * ***** * * * * *

AMENDED ANSWER TO COMPLAINT FOR
INJUNCTIVE AND OTHER EQUITABLE RELIEF

Information Search, Inc. and David J. Kacala, Defendants, by their undersigned counsel, hereby file their Answer to Complaint for Injunctive and Other Equitable Relief, and state as follows:

First Defense

_____The Complaint fails to state a cause of action upon which relief may be granted.

Second Defense

That the Complaint is barred by the applicable statute of limitations and/or repose.

Third Defense

That with regards to each numbered paragraph of the Complaint, Defendants state as follows:

1. Defendants deny the allegations of paragraph 1 of the Complaint;

2. Defendants admit the allegations of paragraphs 2,3,4, and 5 of the Complaint;

3. Defendants admit the first and third sentence of paragraph 6 of the Complaint, and deny the second sentence of paragraph 6 of the Complaint;

4. Defendants admit paragraph 7 of the Complaint;

5. Paragraph 8 of the Complaint is merely a statement of law to which no response is required;

6. Defendants admit paragraphs 9 and 10 of the Complaint, with the exception that the Defendants deny that the "customer phone records" were "confidential"

7. Defendants deny paragraphs 11, 12, 13, 14, 15, and 16 of the Complaint;

8. Paragraph 17 of the Complaint is a statement of law to which no response is required.

/S/ David F. Albright, Jr.

David F. Albright, Jr.

Trial Bar No.: 02234

BENNETT & ALBRIGHT, P.A.

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200 E. Lexington Street

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(410) 727-2168

Attorneys for Defendants

NOTICE OF SERVICE

I hereby certify that on this 8th day of June, 2006, a copy of the foregoing was mailed first-class mail and served by electronic file transfer upon the following:

William Blumenthal, Esquire
Gregory A. Ashe, Esquire
Peder Magee, Esquire
Angela Ball, Esquire
General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Room NJ-2122
Washington, D.C. 20580

/S/ David F. Albright, Jr.
David F. Albright, Jr.