



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

ANSWER OF...
April 7, 2025 20:36

By: JAZMINE R. GREER 0083706

Confirmation Nbr. 3456841

CEDAR ADVANCE, LLC

CV 25 114000

vs.

Judge: KEVIN J. KELLEY

NORTHEAST OHIO NEIGHBORHOOD HEALTH
SERVICES, ET AL

Pages Filed: 4

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO
CIVIL DIVISION

Cedar Advance LLC)	CASE NO. CV 25 114000
)	
v.)	JUDGE: Kevin J. Kelley
)	
Northeast Ohio Neighborhood)	ANSWER OF DEFENDANTS
Health Services, Inc. (NEON) et. al.)	NEON AND WILLIE AUSTIN

Now comes defendant NEON and Willie Austin by and through undersigned counsel and does hereby submit its response to Plaintiff's Complaint.

ANSWER

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted in paragraph 1 of Plaintiff's Complaint.
2. Defendants deny the allegations made in paragraph 2 of the Complaint where NEON is a non-profit health services organization.
3. Defendants admit the allegations contained in paragraph 3 of the Complaint.
4. In response to paragraph 4 of the Complaint defendants state that paragraph 4 speaks for itself.
5. In response to paragraph 5 of the Complaint defendants state that any Agreement attached to the Complaint speaks for itself.
6. In response to paragraph 6 of the Complaint defendants state that any Agreement attached to the Complaint speaks for itself.
7. Defendants deny the allegations contained in paragraph 7 of the Complaint.
8. Defendants deny the allegations contained in paragraph 8 of the Complaint.

9. Defendants deny the allegations contained in paragraph 9 of the Complaint.
10. In response to paragraph 10 of the Complaint defendants state that paragraph 10 speaks for itself.
11. Defendants deny the allegations contained in paragraph 11 of the Complaint.
12. Defendants deny the allegations contained in paragraph 12 of the Complaint.
13. Defendants deny the allegations contained in paragraph 13 of the Complaint.
14. In response to paragraph 14 of the Complaint defendants state that paragraph 14 speaks for itself.
15. Defendants deny the allegations contained in paragraph 15 of the Complaint.
16. Defendants deny the allegations contained in paragraph 16 of the Complaint.
17. Defendants deny the allegations contained in paragraph 17 of the Complaint.
18. In response to paragraph 18 of the Complaint defendants state that paragraph 18 speaks for itself.
19. Defendants deny the allegations contained in paragraph 19 of the Complaint.
20. Defendants deny the allegations contained in paragraph 20 of the Complaint.
21. In response to paragraph 21 of the Complaint defendants state that paragraph 21 speaks for itself.
22. Defendants deny the allegations contained in paragraph 22 of the Complaint.

ADDITIONAL AND/OR AFFIRMATIVE DEFENSES

23. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant realleges all of the admissions, denials and averments in this Answer as if fully rewritten herein.

24. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant states that Plaintiff fails to state a claim upon which relief can be granted where Plaintiff has received substantially more than the principle amount of the loan or the defendant has not missed payments or has not failed to make payments.
25. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant states that Plaintiff has failed to join all necessary and indispensable parties to this lawsuit required for a just adjudication of the within case.
26. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant asserts improper service.
27. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant asserts improper service of process.
28. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant states that Plaintiff's Claims is barred by the applicable statute of limitations.
29. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant states that Plaintiff has failed to mitigate its alleged damages.
30. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant states that she further reserves the right to later assert affirmative defenses that become apparent by further discovery.

Respectfully submitted,

/s/ Jazmine Greer
Jazmine Greer (0083706)
3030 Euclid Ave Ste 307
Cleveland, Ohio 44115
216-218-0112 (direct dial)
216-916-1086 (facsimile)
j.greer@greerlawfirmohio.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served electronically through this Court's e-file system on all parties so notified via the Court's e-file system on this 8th day of April, 2025 and party not notified by this Court's e-file service are served via regular US mail.

Respectfully submitted,

/s/ Jazmine Greer
Jazmine Greer (0083706)