



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

Court of Common Pleas

ANSWER OF...
April 7, 2025 21:24

By: JAZMINE R. GREER 0083706

Confirmation Nbr. 3456848

OHIO SERVICES CLE,LLC

CV 25 113703

vs.

Judge: SHERRIE MIDAY

NORTHEAST OHIO NEIGHBORHOOD HEALTH
SERVICE, INC.

Pages Filed: 3

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

Ohio Services -CLE LLC)	CASE NO. CV 25 113703
)	
v.)	JUDGE: Sherrie Miday
)	
Northeast Ohio Neighborhood)	ANSWER OF DEFENDANT
Health Services, Inc. (NEON) et. al.)	NEON

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

ANSWER

1. Defendant is 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. In response to paragraph 2 of the Complaint defendant states that any Agreement attached to the Complaint speaks for itself.
3. Defendant denies the allegations made in paragraph 3 of the Complaint.
4. Defendant denies the allegations made in paragraph 4 of the Complaint.
5. Defendant denies the allegations made in paragraph 5 of the Complaint.
6. Defendant denies the allegations made in paragraph 6 of the Complaint.
7. Defendant denies the allegations made in paragraph 7 of the Complaint.
8. Defendant denies the allegations made in paragraph 8 of the Complaint.
9. In response to paragraph 9 of the Complaint defendant states that paragraph 9 speaks for itself.
10. Defendant denies the allegations made in paragraph 10 of the Complaint.

11. Defendant denies the allegations made in paragraph 11 of the Complaint.
12. In response to paragraph 12 of the Complaint defendant states that paragraph 12 speaks for itself.
13. Defendant denies the allegations made in paragraph 13 of the Complaint.
14. Defendant denies the allegations made in paragraph 14 of the Complaint.
15. Defendant denies the allegations made in paragraph 15 of the Complaint.

ADDITIONAL AND/OR AFFIRMATIVE DEFENSES

16. 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.
17. 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 suspended service causing defendants damages to obtain replacement services.
18. 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.
19. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant asserts improper service.
20. Further answering, and as an additional defense to the allegations contained in Plaintiff's Complaint, Defendant asserts improper service of process.

21. 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.

22. 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.

23. 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)