

STATE OF MICHIGAN
WASHTENAW COUNTY CIRCUIT COURT

COMERICA BANK,

Plaintiff/Counter-Defendant,

v.

LIBERTARIAN PARTY OF MICHIGAN
EXECUTIVE COMMITTEE, INC.,
JOSEPH BRUNGARDT, MICHAEL
SALIBA and ANGELA THORNTON
Aka ANGELA CANNY

Honorable Timothy P. Connors

Case Number 23-000557-CB

Defendants/Counter-Plaintiffs,

ANDREW CHADDERDON,

Defendant.

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Libertarian Party of Michigan Executive Committee,
Inc., Joseph Brungardt, Michael Saliba, and Angela
Thornton*

ANSWER TO FIRST AMENDED COMPLAINT

Defendants/Counter-Plaintiffs Libertarian Party of Michigan Executive Committee, Inc. ("LPMEC"), Joseph Brungardt, Michael Saliba, and Angela Thornton (the "Saliba Board Defendants") answer Comerica Bank's first amended complaint as follows. With respect to all allegations and claims made in Comerica Bank's original complaint, LPMEC and the Saliba Board Defendants' answer dated May 10, 2023, stands, as permitted by MCR 2.118(b)(2). With respect

to the new allegations and claim in Count III of the first amended complaint, LPMEC and the Saliba Board Defendants answer:

COUNT III

42. All of the defendants except Andrew Chadderdon have filed a counterclaim asserting that Comerica is liable for the amount of draws against LPMEC's deposits during the time that Andrew Chadderdon acted as sole signer for LPMEC.

Answer: Admitted.

43. When he files a responsive pleading, Andrew Chadderdon may make a corresponding claim against Comerica arising out of any draws made by the other individual defendants while they acted as signers for LPMEC.

Answer: Neither admitted nor denied because paragraph 43 states a legal conclusion that does not require a response.

44. Comerica contests whether it should be held liable to reimburse any of the defendants for any draws made by any of the individual defendants.

Answer: Admitted that paragraph 44 accurately states Comerica's position.

45. In the event, however, that Comerica is held liable for honoring any draw authorized by any individual defendant, then Comerica ask for a corresponding award of damages against that individual defendant.

Answer: Admitted that paragraph 45 accurately states the relief that Comerica is seeking.

Respectfully submitted,

CURCIO LAW FIRM PLC

Dated: May 25, 2023

By: /s/ C. Nicholas Curcio
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