

1 **LAW OFFICES OF DARSHAN PATEL, APC**

2 R. ALAN SMITH, ESQ. (CBN: 062835)

3 DARSHAN PATEL, ESQ. (CBN: 312423)

4 2655 Camino Del Rio North, Suite 330

5 San Diego, CA 92108

6 Telephone: (619) 940-6623

7 Email: [asmith@lawpatel.com](mailto:asmith@lawpatel.com)

ELECTRONICALLY

**FILED**

Superior Court of California,  
County of San Francisco

**09/06/2019**

Clerk of the Court

BY: KALENE APOLONIO

Deputy Clerk

8 Attorneys for Defendants

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **IN AND FOR COUNTY OF SAN FRANCISCO**

11 DONNA DUGO,

12 Plaintiff,

13 v.

14 BRIDGE BKD, LLC, a California

15 limited liability company; and

16 Does 1-50,

17 Defendants.

Civil Case No.: CGC-19-576311

18 **DEFENDANT'S ANSWER TO**  
19 **COMPLAINT**

Judge: Garrett L. Wong

Department: 610

Complaint Filed: 05/29/2019

Trial Date: Not Yet Set

20 Defendants BRIDGE BKD, LLC, a California limited liability company,  
21 now answer the complaint of Plaintiff, Donna Dugo.

22 **GENERAL DENIAL**

23 Under and pursuant to the provisions of California Code of Civil Procedure,  
24 specifically, Section 431.30 thereof, these answering Defendants generally denies  
25  
26  
27  
28

1 each and every allegation of said unverified Complaint, and the whole thereof, and  
2 each and every allegation of each and every cause of action alleged therein, and  
3 further expressly deny that as a direct or proximate result of any acts or omissions  
4 on the part of these answering Defendants, Plaintiff herein sustained or suffered  
5 injury or damage in the amount alleged in the unverified Complaint, or in any  
6 amount at all, or that Plaintiff has suffered injury or damage for any reason in the  
7 sums alleged in the unverified Complaint, or in any other sum or sums, or at all.

8  
9 **FIRST AFFIRMATIVE DEFENSE**

10 **FAILURE TO STATE A CLAIM**

11 As a first, separate, and affirmative defense to the unverified Complaint on  
12 file herein, these answering Defendants allege that Plaintiff's unverified  
13 Complaint, in its entirety, nor any purported cause of action set forth therein, allege  
14 facts sufficient to constitute a cause of action against these answering Defendants.

15  
16 **PRAYER**

17 WHEREFORE, Defendant prays for the following:

- 18 1. That Plaintiff take nothing from his complaint;  
19 2. Plaintiff's complaint be dismissed for failure to state a claim;  
20 3. For reasonable attorney fees and costs of suit; and  
21 4. For any and further relief that the Court deems proper.  
22

23  
24 Dated: September 6, 2019

**LAW OFFICES OF DARSHAN PATEL APC**



25  
26 R. ALAN SMITH, ESQ.  
27 DARSHAN PATEL, ESQ.  
28 Attorneys for Defendants  
BRIDGE BKD, LLC

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**  
**DONNA DUGO v. BRIDGE BKD, LLC, et. al.**

I, the undersigned, am over the age of eighteen years. I am not a party to the above-entitled action; my business address is 2655 Camino Del Rio N, Ste 330, San Diego, California 92108.

On September 6, 2019 I served the following document(s):

**DEFENDANT'S ANSWER TO COMPLAINT**

Addressed to:

Joseph Manning, Esq.  
Michael J. Manning, Esq.  
Tristan P. Jankowski, Esq.  
Craig G. Cote, Esq.  
Osman Tahir, Esq.  
MANNING LAW, APC  
20062 SW Birch Street, Ste 200  
Newport Beach, CA 92660

BY MAIL: I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at San Diego, California.

BY FACSIMILE: In addition to the service by mail as set forth above, I forwarded a copy of said documents via facsimile to the listed facsimile number.

BY OVERNITE EXPRESS: I caused such envelope with postage thereon fully prepaid to be placed in the Designated Overnight Express drop box at San Diego, California.

BY PERSONAL SERVICE: I caused said documents to be personally served on all listed recipients via Diversified Legal Services.

BY ELECTRONIC MAIL TRANSMISSION: via email. I caused the listed documents to be electronically filed and subsequently emailed to the recipient(s).

Executed on September 6, 2019, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Vinh To