



### **THIRD DEFENSE**

Plaintiffs' Complaint is barred by the absence of a physician/patient relationship in the within matter.

### **FOURTH DEFENSE**

#### **ANSWERING THE COMPLAINT**

Answering the allegations of paragraph 1 of Plaintiffs' Complaint, Defendants are without knowledge or information sufficient to form a truth as to the averments of said paragraph and accordingly deny same.

Answering the allegations of paragraph 2 of Plaintiffs' Complaint, Defendants are without knowledge or information sufficient to form a truth as to the averments of said paragraph and accordingly deny same.

The allegations of paragraphs 3, 4, 5, 6, and 7 of Plaintiffs' Complaint require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

The allegations of paragraphs 8, 9, and the second paragraph 9 are admitted.

Answering the allegations of paragraphs 10, 11, 12, 13, 14, 15, and 16 of Plaintiffs' Complaint, Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments of said paragraphs and accordingly deny same.

The allegations of paragraph 17 of Plaintiffs' Complaint are denied.

Answering the allegations of paragraph 18, 19, 20, and 21, Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments of said paragraphs and accordingly deny same.

Answering the allegations of paragraph 22, Defendants acknowledge that Defendant Robbins is an agent of The Robbins Group, Inc. Any and all other allegations of said paragraph are denied.

Answering the allegations of paragraphs 23, 24, 25, 26, 28, 30, 31, 32, 33 and 34 of Plaintiffs' Complaint, Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments of said paragraph and accordingly deny same.

Answering the allegations of paragraph 27, Defendants deny that the deceased was assessed on September 24, 2007. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of said paragraph and accordingly denies same.

Answering the allegations of paragraph 29, Defendants admit that on June 3, 2008 Dr. Robbins performed a history and physical of the deceased and ordered certain standard tests which were determined to be necessary by Narconon. Defendants reported the results of said tests to the entity requesting and paying for said test, said entity being Narconon. Defendants

deny that any physician/patient relationship arose as a result of Dr. Robbins' performing this work.

**ANSWERING COUNT I:**

The allegations of paragraphs 35, 36, 37 and 38 require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

**ANSWERING COUNT II:**

The allegations of paragraphs 39, 40 and 41 of Plaintiffs' Complaint require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

**ANSWERING COUNT III:**

The allegations of paragraphs 42, 43, 44, 45, 46, and 47 of Plaintiffs' Complaint require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

**ANSWERING COUNT IV:**

The allegations of paragraphs 48, 49, 50 and 51 of Plaintiffs' Complaint require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

**ANSWERING COUNT V:**

The allegations of paragraphs 52 and 52 of Plaintiffs' Complaint require no answer of these Defendants, but if answer should be deemed necessary said allegations are denied.

**ANSWERING COUNT VI:**

The allegations of paragraphs 54 and 55 of Plaintiffs' Complaint are denied.

Answering the allegations of paragraph 56, Defendants deny there was any negligence in any of Dr. Robbins' activity in connection with the designated individual. As a result, such non-

negligence could not be the cause of anything, and accordingly the allegations of said paragraph are denied.

**ANSWERING COUNT VII:**

The allegations of paragraph 57 require no answer of these Defendants, but if answer should be deemed necessary, said allegations are denied.

**ANSWERING COUNT VIII:**

The allegations of paragraph 58 require no answer of these Defendants, but if answer should be deemed necessary, said allegations are denied.

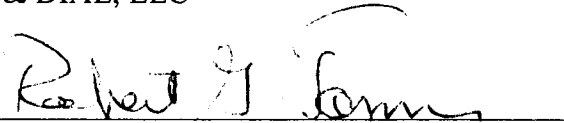
Any and all other allegations of Plaintiffs' Complaint are denied and these Defendants specifically deny that they are indebted to Plaintiffs in any sum whatsoever.

DEFENDANTS RESPECTFULLY REQUEST THIS COURT TO HOLD A PRETRIAL HEARING BEFORE THE ACTUAL TRIAL OF THIS MATTER.

WHEREFORE, having fully answered Plaintiffs' Complaint, these Defendants demand judgment in their favor.

Respectfully submitted this 14 day of June, 2010.

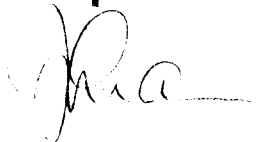
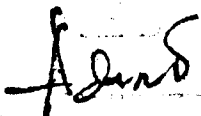
WEINBERG, WHEELER, HUDGINS, GUNN  
& DIAL, LLC



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State Bar No. 697650  
Attorney for Defendants Lisa Carolina Robbins, M.D.  
and The Robbins Group, Inc.

STATE COURT OF  
NORTH CAROLINA

JUN 14 2010



**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the within and foregoing pleading on opposing counsel by mailing a copy of same in the U.S. Mail properly stamped and addressed to:

Darren W. Penn, Esq.  
Harris Penn & Lowry, LLP  
817 W. Peachtree Street, Suite 1105  
Atlanta, Georgia 30308

This 17 day of June, 2010

WEINBERG, WHEELER, HUDGINS, GUNN  
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