

1 BLAKELY LAW GROUP  
2 BRENT H. BLAKELY (SBN 157292)  
3 1334 Park View Avenue, Suite 280  
4 Manhattan Beach, California 90266  
5 Telephone: (310) 546-7400  
6 Facsimile: (310) 546-7401  
7 Email: [BBlakely@BlakelyLawGroup.com](mailto:BBlakely@BlakelyLawGroup.com)  
8 Attorneys for Defendant  
9 MICHAEL COHEN

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

STEPHANIE CLIFFORD (AKA  
STORMY DANIELS), an individual,

Plaintiffs,

v.

KEITH M. DAVIDSON, an individual,  
MICHAEL COHEN, an individual, and  
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:18-cv-05052-SJO (FFMx)

**DEFENDANT MICHAEL  
COHEN’S ANSWER TO  
PLAINTIFF STEPHANIE  
CLIFFORD’S COMPLAINT**

**Hon. S. James Otero**

Complaint Filed: June 6, 2018

Defendant MICHAEL COHEN (hereinafter “COHEN”) answers the Complaint of STEPHANIE CLIFFORD (hereinafter “CLIFFORD”) as follows:

**FACTUAL DEFENSES**

1. COHEN admits the facts as alleged in paragraph 1 of the Complaint.
2. COHEN lacks the requisite knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 2 and on that basis, denies the allegations.
3. COHEN admits the facts as alleged in paragraph 3 of the Complaint.
4. Paragraph 4 of the Complaint is a technical pleading paragraph and contains no facts that enable COHEN to either admit or deny its contents.

1           5. Paragraph 5 of the Complaint is a technical pleading paragraph and  
2 contains no facts that enable COHEN to either admit or deny its contents.

3           6. Paragraph 6 of the Complaint is a technical pleading paragraph and  
4 contains no facts that enable COHEN to either admit or deny its contents.

5           7. Paragraph 7 of the Complaint is a technical pleading paragraph and  
6 contains no facts that enable COHEN to either admit or deny its contents. COHEN  
7 denies that there is personal jurisdiction over him in the State of California.

8           8. COHEN lacks the requisite knowledge or information sufficient to form  
9 a belief as to the truth or falsity of the allegations in paragraph 8 and on that basis,  
10 denies the allegations.

11           9. COHEN admits that he is an attorney licensed in the State of New York  
12 and that in the past he has acted as Donald Trump's attorney in connection with  
13 certain issues.

14           10. COHEN lacks the requisite knowledge or information sufficient to form  
15 a belief as to the truth or falsity of the allegations in paragraph 10 and on that basis,  
16 denies the allegations.

17           11. COHEN admits the facts as alleged in paragraph 11 of the Complaint.

18           12. COHEN admits that DAVIDSON was acting as CLIFFORD'S attorney  
19 in connection with the October 2016 agreement.

20           13. COHEN objects to paragraph 13 in that answering same would  
21 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
22 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
23 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
24 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

25           14. COHEN lacks the requisite knowledge or information sufficient to form  
26 a belief as to the truth or falsity of the allegations in paragraph 14 and on that basis,  
27 denies the allegations.

28

1           15. COHEN admits that he acted for the benefit of his client, Mr. Trump, but  
2 lacks the requisite knowledge or information sufficient to form a belief as to the truth  
3 or falsity of the remaining allegations in paragraph 15 and on that basis, denies the  
4 allegations.

5           16. COHEN objects to paragraph 16 in that answering same would  
6 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
7 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
8 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
9 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

10           17. COHEN objects to paragraph 17 in that answering same would  
11 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
12 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
13 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
14 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

15           18. COHEN objects to paragraph 18 in that answering same would  
16 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
17 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
18 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
19 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

20           19. COHEN denies the allegations of paragraph 19.

21           20. COHEN objects to paragraph 20 in that answering same would  
22 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
23 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
24 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
25 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

26           21. COHEN objects to paragraph 21 in that answering same would  
27 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
28

1 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
2 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
3 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

4 22. COHEN objects to paragraph 22 in that answering same would  
5 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
6 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
7 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
8 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

9 23. COHEN objects to paragraph 23 in that answering same would  
10 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
11 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
12 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
13 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

14 24. COHEN objects to paragraph 24 in that answering same would  
15 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
16 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
17 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
18 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

19 25. COHEN objects to paragraph 25 in that answering same would  
20 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
21 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
22 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
23 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

24 26. COHEN objects to paragraph 26 in that answering same would  
25 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
26 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
27 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
28

1 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

2 27. COHEN objects to paragraph 27 in that answering same would  
3 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
4 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
5 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
6 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

7 28. COHEN objects to paragraph 28 in that answering same would  
8 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
9 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
10 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
11 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

12 29. COHEN objects to paragraph 29 in that answering same would  
13 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
14 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
15 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
16 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

17 30. COHEN objects to paragraph 30 in that answering same would  
18 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
19 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
20 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
21 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

22 31. COHEN objects to paragraph 31 in that answering same would  
23 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
24 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
25 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
26 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

27 32. COHEN objects to paragraph 32 in that answering same would

28

1 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
2 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
3 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
4 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

5 33. COHEN objects to paragraph 33 in that answering same would  
6 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
7 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
8 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
9 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

10 34. COHEN denies the allegations of paragraph 34.

11 35. COHEN objects to the factual allegations contained in paragraph 35 in  
12 that answering same would potentially implicate his Fifth Amendment Rights and  
13 thus violate the Stay Order issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist.  
14 Cal., 18-cv-2217, Dkt. #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-  
15 87 (4th Cir. 1987); *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal.  
16 2010).

17 36. COHEN lacks the requisite knowledge or information sufficient to form  
18 a belief as to the truth or falsity of the allegations in paragraph 36 and on that basis,  
19 denies the allegations.

20 37. COHEN objects to paragraph 37 in that answering same would  
21 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
22 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
23 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
24 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

25 38. COHEN admits that an arbitration proceeding was filed. COHEN  
26 objects to paragraph 38 in that answering same would potentially implicate his Fifth  
27 Amendment Rights and thus violate the Stay Order issued in *Clifford v. Trump*, Case  
28

1 No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt. #53; *see N. River Ins. Co., Inc. v.*  
2 *Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987); *KLA-Tencor Corp. v. Murphy*, 717 F.  
3 Supp. 2d 895 (N.D. Cal. 2010).

4 39. COHEN objects to paragraph 39 in that answering same would  
5 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
6 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
7 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
8 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

9 40. COHEN objects to paragraph 40 in that answering same would  
10 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
11 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
12 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
13 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

14 41. COHEN objects to paragraph 41 in that answering same would  
15 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
16 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
17 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
18 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

19 42. COHEN objects to paragraph 42 in that answering same would  
20 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
21 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
22 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
23 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

24 43. COHEN objects to paragraph 43 in that answering same would  
25 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
26 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
27 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
28

1 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

2 44. COHEN objects to paragraph 44 in that answering same would  
3 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
4 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
5 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
6 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

7 45. COHEN objects to paragraph 45 in that answering same would  
8 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
9 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
10 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
11 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

12 46. COHEN objects to paragraph 46 in that answering same would  
13 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
14 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
15 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
16 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

17 47. COHEN objects to paragraph 47 in that answering same would  
18 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
19 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
20 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
21 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

22 48. COHEN objects to paragraph 48 in that answering same would  
23 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
24 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
25 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
26 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

27 49. COHEN objects to paragraph 49 in that answering same would

28



1 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
2 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
3 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
4 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

5 50. COHEN lacks the requisite knowledge or information sufficient to form  
6 a belief as to the truth or falsity of the allegations in paragraph 50 and on that basis,  
7 denies the allegations.

8 51. COHEN denies the allegations of paragraph 51.

9 52. COHEN objects to paragraph 52 in that answering same would  
10 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
11 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
12 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
13 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

14 53. COHEN objects to paragraph 53 in that answering same would  
15 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
16 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
17 #53; see *N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
18 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

19 54. COHEN lacks the requisite knowledge or information sufficient to form  
20 a belief as to the truth or falsity of the allegations in paragraph 54 and on that basis,  
21 denies the allegations.

22 55. COHEN lacks the requisite knowledge or information sufficient to form  
23 a belief as to the truth or falsity of the allegations in paragraph 55 and on that basis,  
24 denies the allegations.

25 56. COHEN lacks the requisite knowledge or information sufficient to form  
26 a belief as to the truth or falsity of the allegations in paragraph 56 and on that basis,  
27 denies the allegations.

28

1           57. COHEN lacks the requisite knowledge or information sufficient to form  
2 a belief as to the truth or falsity of the allegations in paragraph 57 and on that basis,  
3 denies the allegations.

4           58. COHEN lacks the requisite knowledge or information sufficient to form  
5 a belief as to the truth or falsity of the allegations in paragraph 58 and on that basis,  
6 denies the allegations.

7           59. COHEN lacks the requisite knowledge or information sufficient to form  
8 a belief as to the truth or falsity of the allegations in paragraph 59 and on that basis,  
9 denies the allegations.

10          60. COHEN denies CLIFFORD'S claim that she was in any way damaged  
11 by COHEN'S conduct.

12          61. Paragraph 61 of the Complaint is a technical pleading paragraph and  
13 contains no facts that enable COHEN to either admit or deny its contents.

14          62. COHEN lacks the requisite knowledge or information sufficient to form  
15 a belief as to the truth or falsity of the allegations in paragraph 62 and on that basis,  
16 denies the allegations.

17          63. COHEN lacks the requisite knowledge or information sufficient to form  
18 a belief as to the truth or falsity of the allegations in paragraph 63 and on that basis,  
19 denies the allegations.

20          64. COHEN lacks the requisite knowledge or information sufficient to form  
21 a belief as to the truth or falsity of the allegations in paragraph 64 and on that basis,  
22 denies the allegations.

23          65. COHEN lacks the requisite knowledge or information sufficient to form  
24 a belief as to the truth or falsity of the allegations in paragraph 65 and on that basis,  
25 denies the allegations.

26          66. COHEN admits that he acted for the benefit of his client, Mr. Trump, but  
27 lacks the requisite knowledge or information sufficient to form a belief as to the truth  
28

1 or falsity of the remaining allegations in paragraph 66 and on that basis, denies the  
2 allegations.

3 67. COHEN objects to paragraph 67 in that answering same would  
4 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
5 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
6 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
7 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

8 68. COHEN lacks the requisite knowledge or information sufficient to form  
9 a belief as to the truth or falsity of the allegations in paragraph 68 and on that basis,  
10 denies the allegations.

11 69. COHEN lacks the requisite knowledge or information sufficient to form  
12 a belief as to the truth or falsity of the allegations in paragraph 69 and on that basis,  
13 denies the allegations.

14 70. COHEN objects to paragraph 70 in that answering same would  
15 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
16 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
17 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
18 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

19 71. COHEN lacks the requisite knowledge or information sufficient to form  
20 a belief as to the truth or falsity of the allegations in paragraph 71 and on that basis,  
21 denies the allegations.

22 72. COHEN denies that CLIFFORD was damaged.

23 73. COHEN lacks the requisite knowledge or information sufficient to form  
24 a belief as to the truth or falsity of the allegations in paragraph 73 and on that basis,  
25 denies the allegations.

26 74. Paragraph 74 of the Complaint is a technical pleading paragraph and  
27 contains no facts that enable COHEN to either admit or deny its contents.

28

1           75. COHEN objects to paragraph 75 in that answering same would  
2 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
3 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
4 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
5 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

6           76. COHEN denies that he is in any way liable to CLIFFORD.

7           77. COHEN objects to paragraph 77 in that answering same would  
8 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
9 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
10 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
11 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

12           78. COHEN denies that he is in any way liable to CLIFFORD.

13           79. COHEN objects to paragraph 79 in that answering same would  
14 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
15 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
16 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
17 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

18           80. COHEN objects to paragraph 80 in that answering same would  
19 potentially implicate his Fifth Amendment Rights and thus violate the Stay Order  
20 issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt.  
21 #53; *see N. River Ins. Co., Inc. v. Stefanou*, 831 F.2d 484, 486-87 (4th Cir. 1987);  
22 *KLA-Tencor Corp. v. Murphy*, 717 F. Supp. 2d 895 (N.D. Cal. 2010).

23           81. COHEN denies that CLIFFORD has been damaged because of Cohen's  
24 actions.

25           82. COHEN denies that CLIFFORD is entitled to, or that COHEN is in any  
26 way responsible for punitive damages.

27  
28

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

**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

Neither the Complaint, nor any cause of action therein, state facts sufficient to constitute a cause of action against COHEN.

**SECOND AFFIRMATIVE DEFENSE**

The Complaint and each cause of action therein are vague and unintelligible.

**THIRD AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD is not entitled to any relief by virtue of her own unclean hands in the acts and events averred.

**FOURTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD waived her rights against Defendant COHEN and is hence precluded from seeking any relief.

**FIFTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD is barred from seeking any relief based on her and her agents own conduct, actions, inactions and the doctrine of estoppel.

**SIXTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD is barred from seeking any relief as the time period to make a claim has expired.

**SEVENTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD's damages, if any, were proximately caused by and contributed to by Plaintiff CLIFFORD's own negligence.

**EIGHTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes the damages claimed by Plaintiff CLIFFORD were proximately caused by third parties and not by any action, or

1 inaction, of Defendant COHEN.

2 **NINTH AFFIRMATIVE DEFENSE**

3 Defendant COHEN is informed and believes that Plaintiff CLIFFORD suffered  
4 no damages as alleged and is therefore entitled to nothing by way of her suit.

5 **TENTH AFFIRMATIVE DEFENSE**

6 Defendant COHEN is informed and believes that Plaintiff CLIFFORD  
7 knowingly assumed all risks about which she complains in the Complaint, and  
8 therefore, is barred from seeking damages to the extent of its assumption.

9 **ELEVENTH AFFIRMATIVE DEFENSE**

10 Defendant COHEN is informed and believes that Plaintiff CLIFFORD's  
11 injuries, losses and damages were caused by an act of God.

12 **TWELFTH AFFIRMATIVE DEFENSE**

13 Defendant COHEN is informed and believes the causes of action in the  
14 Complaint are barred by Code of Civil Procedure §§ 337, 337.1, 337.15, 337, 338.1,  
15 339, 340, 343.

16 **THIRTEENTH AFFIRMATIVE DEFENSE**

17 Defendant COHEN is informed and believes that Plaintiff CLIFFORD is barred  
18 from any recovery by the Statute of Frauds.

19 **FOURTEENTH AFFIRMATIVE DEFENSE**

20 Defendant COHEN is informed and believes that Plaintiff CLIFFORD is barred  
21 from any recovery by the doctrine of latches.

22 **FIFTEENTH AFFIRMATIVE DEFENSE**

23 Defendant COHEN is informed and believes that Plaintiff CLIFFORD is barred  
24 from any recovery by the doctrine of waiver.

25 **SIXTEENTH AFFIRMATIVE DEFENSE**

26 This Court lacks personal jurisdiction over COHEN.  
27  
28

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

**SEVENTEENTH AFFIRMATIVE DEFENSE**

This case was filed in violation of the Stay Order issued in *Clifford v. Trump*, Case No. U.S.D.C. Cent. Dist. Cal., 18-cv-2217, Dkt. #53.

**EIGHTEENTH AFFIRMATIVE DEFENSE**

Any communications between COHEN and DAVIDSON are privileged and protected California Civil Code §47 and similar authority.

**NINETEENTH AFFIRMATIVE DEFENSE**

Defendant COHEN is informed and believes that Plaintiff CLIFFORD failed to mitigate her damages and is thus barred from seeking damages to the extent that she could have mitigated her damages.

COHEN has insufficient knowledge about the availability of other defenses and thus hereby reserve the right to assert additional defenses in this matter in the event that they are found to be appropriate at a future date.

**JURY DEMAND**

In accordance with Fed. R. Civ. P. 38(b), COHEN hereby demands a jury trial on all issues so triable.

WHEREFORE, Defendant COHEN prays that:

- 1. Plaintiff takes nothing by her Complaint;
- 2. For attorneys’ fees and costs of the suit herein;
- 3. For such other relief that the Court deems just and proper.

Dated: July 2, 2018

BLAKELY LAW GROUP

By: /s/ Brent H. Blakely  
 BRENT H. BLAKELY  
*Attorneys for Defendant Michael Cohen*