

COUNT 1

4. Respondents admit paragraph 7 of such Complaint.
5. Respondents admit paragraph 8 of such Complaint.
6. Respondents admit paragraph 9 of such Complaint.
7. Respondents admit paragraph 10 of such Complaint.
8. Respondents admit paragraph 11 of such Complaint.
9. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 12 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

10. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 13 of such Complaint.

11. Respondents deny paragraph 15 of such Complaint.

COUNT 2

12. Respondents admit paragraph 17 of such Complaint.
13. Respondents admit paragraph 18 of such Complaint.
14. Respondents admit paragraph 19 of such Complaint.
15. Respondents admit paragraph 20 of such Complaint.
16. Respondents admit paragraph 21 of such Complaint.
17. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 22 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

18. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 23 of such Complaint.

19. Respondents deny paragraph 25 of such Complaint.

COUNT 3

20. Respondents admit paragraph 27 of such Complaint.

21. Respondents admit paragraph 28 of such Complaint.

22. Respondents admit paragraph 29 of such Complaint.

23. Respondents admit paragraph 30 of such Complaint.

24. Respondents admit paragraph 31 of such Complaint.

25. Respondents do not possess such information to enable Respondents to admit or

deny the allegations of paragraph 32 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

26. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 33 of such Complaint.

27. Respondents deny paragraph 35 of such Complaint.

COUNT 4

28. Respondents admit paragraph 37 of such Complaint.

29. Respondents admit paragraph 38 of such Complaint.

30. Respondents admit paragraph 39 of such Complaint.

31. Respondents admit paragraph 40 of such Complaint.

32. Respondents admit paragraph 41 of such Complaint.

33. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 42 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

34. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 43 of such Complaint.

35. Respondents deny paragraph 45 of such Complaint.

COUNT 5

36. Respondents admit paragraph 47 of such Complaint.

37. Respondents admit paragraph 48 of such Complaint.

38. Respondents admit paragraph 49 of such Complaint.

39. Respondents admit paragraph 50 of such Complaint.

40. Respondents admit paragraph 51 of such Complaint.

41. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 52 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

42. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 53 of such Complaint.

43. Respondents deny paragraph 55 of such Complaint.

COUNT 6

44. Respondents admit paragraph 57 of such Complaint.

45. Respondents admit paragraph 58 of such Complaint.

46. Respondents admit paragraph 59 of such Complaint.

47. Respondents admit paragraph 60 of such Complaint.

48. Respondents admit paragraph 61 of such Complaint.

49. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 62 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

50. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 63 of such Complaint.

51. Respondents deny paragraph 65 of such Complaint.

COUNT 7

52. Respondents admit paragraph 67 of such Complaint.

53. Respondents admit paragraph 68 of such Complaint.

54. Respondents admit paragraph 69 of such Complaint.

55. Respondents admit paragraph 70 of such Complaint.

56. Respondents admit paragraph 71 of such Complaint.

57. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 72 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

58. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 73 of such Complaint.

59. Respondents deny paragraph 75 of such Complaint.

COUNT 8

60. Respondents admit paragraph 77 of such Complaint.

61. Respondents admit paragraph 78 of such Complaint.

62. Respondents admit paragraph 79 of such Complaint.

63. Respondents admit paragraph 80 of such Complaint.

64. Respondents admit paragraph 81 of such Complaint.

65. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 82 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

66. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 83 of such Complaint.

67. Respondents deny paragraph 85 of such Complaint.

COUNT 9

68. Respondents admit paragraph 87 of such Complaint.

69. Respondents admit paragraph 88 of such Complaint.

70. Respondents admit paragraph 89 of such Complaint.

71. Respondents admit paragraph 90 of such Complaint.

72. Respondents admit paragraph 91 of such Complaint.

73. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 92 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

74. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 93 of such Complaint.

75. Respondents deny paragraph 95 of such Complaint.

COUNT 10

76. Respondents admit paragraph 97 of such Complaint.

77. Respondents admit paragraph 98 of such Complaint.

78. Respondents admit paragraph 99 of such Complaint.
79. Respondents admit paragraph 100 of such Complaint.
80. Respondents admit paragraph 101 of such Complaint.
81. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 102 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract
82. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 103 of such Complaint.
83. Respondents deny paragraph 105 of such Complaint.
-

COUNT 11

84. Respondents admit paragraph 107 of such Complaint.
85. Respondents admit paragraph 108 of such Complaint.
86. Respondents admit paragraph 109 of such Complaint.
87. Respondents admit paragraph 110 of such Complaint.
88. Respondents admit paragraph 111 of such Complaint.
89. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 112 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.
90. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 113 of such Complaint.
91. Respondents deny paragraph 115 of such Complaint.

COUNT 12

92. Respondents admit paragraph 117 of such Complaint.

93. Respondents admit paragraph 118 of such Complaint.

94. Respondents admit paragraph 119 of such Complaint.

95. Respondents admit paragraph 120 of such Complaint.

96. Respondents admit paragraph 121 of such Complaint.

97. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 122 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

98. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 123 of such Complaint.

99. Respondents deny paragraph 125 of such Complaint.

COUNT 13

100. Respondents admit paragraph 127 of such Complaint.

101. Respondents admit paragraph 128 of such Complaint.

102. Respondents admit paragraph 129 of such Complaint.

103. Respondents admit paragraph 130 of such Complaint.

104. Respondents admit paragraph 131 of such Complaint.

105. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 132 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

106. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 133 of such Complaint.

107. Respondents deny paragraph 135 of such Complaint.

COUNT 14

108. Respondents admit paragraph 137 of such Complaint.

109. Respondents admit paragraph 138 of such Complaint.

110. Respondents admit paragraph 139 of such Complaint.

111. Respondents admit paragraph 140 of such Complaint.

112. Respondents admit paragraph 141 of such Complaint.

113. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 142 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

114. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 143 of such Complaint.

115. Respondents deny paragraph 145 of such Complaint.

COUNT 15

116. Respondents admit paragraph 147 of such Complaint.

117. Respondents admit paragraph 148 of such Complaint.

118. Respondents admit paragraph 149 of such Complaint.

119. Respondents admit paragraph 150 of such Complaint.

120. Respondents admit paragraph 151 of such Complaint.

121. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 152 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

122. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 153 of such Complaint.

123. Respondents deny paragraph 155 of such Complaint.

COUNT 16

124. Respondents admit paragraph 157 of such Complaint.

125. Respondents admit paragraph 158 of such Complaint.

126. Respondents admit paragraph 159 of such Complaint.

127. Respondents admit paragraph 160 of such Complaint.

128. Respondents admit paragraph 161 of such Complaint.

129. Respondents do not possess such information to enable Respondents to admit or

deny the allegations of paragraph 162 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

130. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 163 of such Complaint.

131. Respondents deny paragraph 165 of such Complaint.

COUNT 17

132. Respondents admit paragraph 167 of such Complaint.

133. Respondents admit paragraph 168 of such Complaint.

134. Respondents admit paragraph 169 of such Complaint.

135. Respondents admit paragraph 170 of such Complaint.

136. Respondents admit paragraph 171 of such Complaint.

137. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 172 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

138. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 173 of such Complaint.

139. Respondents deny paragraph 175 of such Complaint.

COUNT 18

140. Respondents admit paragraph 177 of such Complaint.

141. Respondents admit paragraph 178 of such Complaint.

142. Respondents admit paragraph 179 of such Complaint.

143. Respondents admit paragraph 180 of such Complaint.

144. Respondents admit paragraph 181 of such Complaint.

145. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 182 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

146. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 183 of such Complaint.

147. Respondents deny paragraph 185 of such Complaint.

COUNT 19

148. Respondents admit paragraph 187 of such Complaint.

149. Respondents admit paragraph 188 of such Complaint.

150. Respondents admit paragraph 189 of such Complaint.

151. Respondents admit paragraph 190 of such Complaint.

152. Respondents admit paragraph 191 of such Complaint.

153. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 192 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

154. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 193 of such Complaint.

155. Respondents deny paragraph 195 of such Complaint.

COUNT 20

156. Respondents admit paragraph 197 of such Complaint.

157. Respondents admit paragraph 198 of such Complaint.

158. Respondents admit paragraph 199 of such Complaint.

159. Respondents admit paragraph 200 of such Complaint.

160. Respondents admit paragraph 201 of such Complaint.

161. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 202 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

162. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 203 of such Complaint.

163. Respondents deny paragraph 205 of such Complaint.

COUNT 21

164. Respondents admit paragraph 207 of such Complaint.

165. Respondents admit paragraph 208 of such Complaint.

166. Respondents admit paragraph 209 of such Complaint.

167. Respondents admit paragraph 210 of such Complaint.

168. Respondents admit paragraph 211 of such Complaint.

169. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 212 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

170. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 213 of such Complaint.

171. Respondents deny paragraph 215 of such Complaint.

COUNT 22

172. Respondents admit paragraph 217 of such Complaint.

173. Respondents admit paragraph 218 of such Complaint.

174. Respondents admit paragraph 219 of such Complaint.

175. Respondents admit paragraph 220 of such Complaint.

176. Respondents admit paragraph 221 of such Complaint.

177. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 222 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

178. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 223 of such Complaint.

179. Respondents deny paragraph 225 of such Complaint.

COUNT 23

180. Respondents admit paragraph 227 of such Complaint.

181. Respondents admit paragraph 228 of such Complaint.

182. Respondents admit paragraph 229 of such Complaint.

183. Respondents admit paragraph 230 of such Complaint.

184. Respondents admit paragraph 231 of such Complaint.

185. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 232 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

186. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 233 of such Complaint.

187. Respondents deny paragraph 235 of such Complaint.

COUNT 24

188. Respondents admit paragraph 237 of such Complaint.

189. Respondents admit paragraph 238 of such Complaint.

190. Respondents admit paragraph 239 of such Complaint.

191. Respondents admit paragraph 240 of such Complaint.

192. Respondents admit paragraph 241 of such Complaint.

193. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 242 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

194. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 243 of such Complaint.

195. Respondents deny paragraph 245 of such Complaint.

COUNT 25

196. Respondents admit paragraph 247 of such Complaint.

197. Respondents admit paragraph 248 of such Complaint.

198. Respondents admit paragraph 249 of such Complaint.

199. Respondents admit paragraph 250 of such Complaint.

200. Respondents admit paragraph 251 of such Complaint.

201. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 252 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

202. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 253 of such Complaint.

203. Respondents deny paragraph 255 of such Complaint.

COUNT 26

204. Respondents admit paragraph 257 of such Complaint.

205. Respondents admit paragraph 258 of such Complaint.

206. Respondents admit paragraph 259 of such Complaint.

207. Respondents admit paragraph 260 of such Complaint.

208. Respondents admit paragraph 261 of such Complaint.

209. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 262 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

210. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 263 of such Complaint.

211. Respondents deny paragraph 265 of such Complaint.

COUNT 27

212. Respondents admit paragraph 267 of such Complaint.

213. Respondents admit paragraph 268 of such Complaint.

214. Respondents admit paragraph 269 of such Complaint.

215. Respondents admit paragraph 270 of such Complaint.

216. Respondents admit paragraph 271 of such Complaint.

217. Respondents do not possess such information to enable Respondents to admit or

deny the allegations of paragraph 272 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

218. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 273 of such Complaint.

219. Respondents deny paragraph 275 of such Complaint.

COUNT 28

220. Respondents admit paragraph 277 of such Complaint.

221. Respondents admit paragraph 278 of such Complaint.

222. Respondents admit paragraph 279 of such Complaint.

223. Respondents admit paragraph 280 of such Complaint.

224. Respondents admit paragraph 281 of such Complaint.

225. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 282 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

226. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 283 of such Complaint.

227. Respondents deny paragraph 285 of such Complaint.

COUNT 29

228. Respondents admit paragraph 287 of such Complaint.

229. Respondents admit paragraph 288 of such Complaint.

230. Respondents admit paragraph 289 of such Complaint.

231. Respondents admit paragraph 290 of such Complaint.

232. Respondents admit paragraph 291 of such Complaint.

233. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 292 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

234. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 293 of such Complaint.

235. Respondents deny paragraph 295 of such Complaint.

COUNT 30

236. Respondents admit paragraph 297 of such Complaint.

237. Respondents admit paragraph 298 of such Complaint.

238. Respondents admit paragraph 299 of such Complaint.

239. Respondents admit paragraph 300 of such Complaint.

240. Respondents admit paragraph 301 of such Complaint.

241. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 302 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

242. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 303 of such Complaint.

243. Respondents deny paragraph 305 of such Complaint.

COUNT 31

244. Respondents admit paragraph 307 of such Complaint.

245. Respondents admit paragraph 308 of such Complaint.

246. Respondents admit paragraph 309 of such Complaint.

247. Respondents admit paragraph 310 of such Complaint.

248. Respondents admit paragraph 311 of such Complaint.

249. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 312 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

250. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 313 of such Complaint.

251. Respondents deny paragraph 315 of such Complaint.

COUNT 32

252. Respondents admit paragraph 317 of such Complaint.

253. Respondents admit paragraph 318 of such Complaint.

254. Respondents admit paragraph 319 of such Complaint.

255. Respondents admit paragraph 320 of such Complaint.

256. Respondents admit paragraph 321 of such Complaint.

257. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 322 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

258. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 323 of such Complaint.

259. Respondents deny paragraph 325 of such Complaint.

COUNT 33

260. Respondents admit paragraph 327 of such Complaint.

261. Respondents admit paragraph 328 of such Complaint.

262. Respondents admit paragraph 329 of such Complaint.

263. Respondents admit paragraph 330 of such Complaint.

264. Respondents admit paragraph 331 of such Complaint.

265. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 332 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

266. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 333 of such Complaint.

267. Respondents deny paragraph 335 of such Complaint.

COUNT 34

268. Respondents admit paragraph 337 of such Complaint.

269. Respondents admit paragraph 338 of such Complaint.

270. Respondents admit paragraph 339 of such Complaint.

271. Respondents admit paragraph 340 of such Complaint.

272. Respondents admit paragraph 341 of such Complaint.

273. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 342 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

274. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 343 of such Complaint.

275. Respondents deny paragraph 345 of such Complaint.

COUNT 35

276. Respondents admit paragraph 347 of such Complaint.

277. Respondents admit paragraph 348 of such Complaint.

278. Respondents admit paragraph 349 of such Complaint.

279. Respondents admit paragraph 350 of such Complaint.

280. Respondents admit paragraph 351 of such Complaint.

281. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 352 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

282. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 353 of such Complaint.

283. Respondents deny paragraph 355 of such Complaint.

COUNT 36

284. Respondents admit paragraph 357 of such Complaint.

285. Respondents admit paragraph 358 of such Complaint.

286. Respondents admit paragraph 359 of such Complaint.

287. Respondents admit paragraph 360 of such Complaint.

288. Respondents admit paragraph 361 of such Complaint.

289. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 362 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

290. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 363 of such Complaint.

291. Respondents deny paragraph 365 of such Complaint.

COUNT 37

292. Respondents admit paragraph 367 of such Complaint.

293. Respondents admit paragraph 368 of such Complaint.

294. Respondents admit paragraph 369 of such Complaint.

295. Respondents admit paragraph 370 of such Complaint.

296. Respondents admit paragraph 371 of such Complaint.

297. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 372 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

298. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 373 of such Complaint.

299. Respondents deny paragraph 375 of such Complaint.

COUNT 38

300. Respondents admit paragraph 377 of such Complaint.

301. Respondents admit paragraph 378 of such Complaint.

302. Respondents admit paragraph 379 of such Complaint.

303. Respondents admit paragraph 380 of such Complaint.

304. Respondents admit paragraph 381 of such Complaint.

305. Respondents do not possess such information to enable Respondents to admit or

deny the allegations of paragraph 382 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

306. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 383 of such Complaint.

307. Respondents deny paragraph 385 of such Complaint.

COUNT 39

308. Respondents admit paragraph 387 of such Complaint.

309. Respondents admit paragraph 388 of such Complaint.

310. Respondents admit paragraph 389 of such Complaint.

311. Respondents admit paragraph 390 of such Complaint.

312. Respondents admit paragraph 391 of such Complaint.

313. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 392 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

314. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 393 of such Complaint.

315. Respondents deny paragraph 395 of such Complaint.

COUNT 40

316. Respondents admit paragraph 397 of such Complaint.

317. Respondents admit paragraph 398 of such Complaint.

318. Respondents admit paragraph 399 of such Complaint.

319. Respondents admit paragraph 400 of such Complaint.

320. Respondents admit paragraph 401 of such Complaint.

321. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 402 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

322. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 403 of such Complaint.

323. Respondents deny paragraph 405 of such Complaint.

COUNT 41

324. Respondents admit paragraph 407 of such Complaint.

325. Respondents admit paragraph 408 of such Complaint.

326. Respondents admit paragraph 409 of such Complaint.

327. Respondents admit paragraph 410 of such Complaint.

328. Respondents admit paragraph 411 of such Complaint.

329. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 412 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

330. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 413 of such Complaint.

331. Respondents deny paragraph 415 of such Complaint.

COUNT 42

332. Respondents admit paragraph 417 of such Complaint.

333. Respondents admit paragraph 418 of such Complaint.

334. Respondents admit paragraph 419 of such Complaint.

335. Respondents admit paragraph 420 of such Complaint.

336. Respondents admit paragraph 421 of such Complaint.

337. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 422 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

338. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 423 of such Complaint.

339. Respondents deny paragraph 425 of such Complaint.

COUNT 43

340. Respondents admit paragraph 427 of such Complaint.

341. Respondents admit paragraph 428 of such Complaint.

342. Respondents admit paragraph 429 of such Complaint.

343. Respondents admit paragraph 430 of such Complaint.

344. Respondents admit paragraph 431 of such Complaint.

345. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 432 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

346. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 433 of such Complaint.

347. Respondents deny paragraph 435 of such Complaint.

COUNT 44

348. Respondents admit paragraph 437 of such Complaint.

349. Respondents admit paragraph 438 of such Complaint.

350. Respondents admit paragraph 439 of such Complaint.

351. Respondents admit paragraph 440 of such Complaint.

352. Respondents admit paragraph 441 of such Complaint.

353. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 442 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

354. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 443 of such Complaint.

355. Respondents deny paragraph 445 of such Complaint.

COUNT 45

356. Respondents admit paragraph 447 of such Complaint.

357. Respondents admit paragraph 448 of such Complaint.

358. Respondents admit paragraph 449 of such Complaint.

359. Respondents admit paragraph 450 of such Complaint.

360. Respondents admit paragraph 451 of such Complaint.

361. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 452 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

362. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 453 of such Complaint.

363. Respondents deny paragraph 455 of such Complaint.

COUNT 46

364. Respondents admit paragraph 457 of such Complaint.

365. Respondents admit paragraph 458 of such Complaint.

366. Respondents admit paragraph 459 of such Complaint.

367. Respondents admit paragraph 460 of such Complaint.

368. Respondents admit paragraph 461 of such Complaint.

369. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 462 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

370. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 463 of such Complaint.

371. Respondents deny paragraph 465 of such Complaint.

COUNT 47

372. Respondents admit paragraph 467 of such Complaint.

373. Respondents admit paragraph 468 of such Complaint.

374. Respondents admit paragraph 469 of such Complaint.

375. Respondents admit paragraph 470 of such Complaint.

376. Respondents admit paragraph 471 of such Complaint.

377. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 472 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

378. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 473 of such Complaint.

379. Respondents deny paragraph 475 of such Complaint.

COUNT 48

380. Respondents admit paragraph 477 of such Complaint.

381. Respondents admit paragraph 478 of such Complaint.

382. Respondents admit paragraph 479 of such Complaint.

383. Respondents admit paragraph 480 of such Complaint.

384. Respondents admit paragraph 481 of such Complaint.

385. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 482 of such Complaint. To the extent of the existence of any such lease, Respondent Sunswept admits that it would have been a party to such contract.

386. Respondents do not possess such information to enable Respondents to admit or deny the allegations of paragraph 483 of such Complaint.

387. Respondents deny paragraph 485 of such Complaint.

PROPOSED PENALTIES

388. Respondents dispute all proposed penalties in counts 1 through 48 on the basis that Respondents have not complied with 15 U.S.C. §2689 and/or pursuant to 40 C.F.R. Part 745 and/or pursuant to 42 U.S.C. §4852d. Upon information and belief, the EPA has based such penalties on poor record keeping or inadequate document production by Respondents as opposed to an actual lack of compliance by Respondents. Respondents deny the EPA's allegations of counts 1 through 48 alleging that Respondents failed to make requisite disclosures to tenants as required by Federal law.

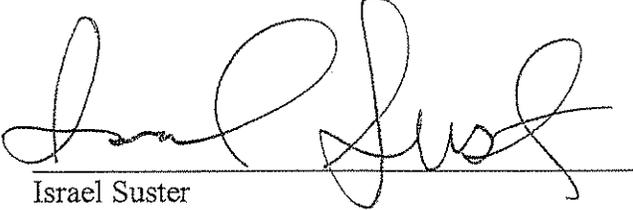
AFFIRMATIVE DEFENSES

389. Respondents and/or Respondent Sunswapt obtained determinations, reports and/or certifications from appropriate third parties as to the non-existence of lead-based paint and/or lead-based hazards at the properties made the basis of counts 1 through 48 of the EPA's Complaint. In addition, such determination, reports and/or certifications were performed or obtained prior to the determinations of liability as asserted in counts 1 through 48 of the EPA's Complaint.

Wherefore, premises considered, Respondents request a hearing as provided for under Federal law.

Respectfully submitted,

ISRAEL L. SUSTER LAW OFFICE
1316 Village Creek Dr., Ste. 500
Plano, Texas 75093-4461
Telephone: (972) 380-0130
Facsimile: (972) 380-4517



Israel Suster
Texas Bar No. 19523580

ATTORNEY FOR RESPONDENTS

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2009, a true and correct copy of Respondents' Original Answer was served on Raymond C. Bosch, Attorney, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 7, 901 N. 5th Street, Kansas City, Kansas 66101, via Certified Mail # 71054522644103731980, Return Receipt Requested and First Class Mail.



Israel Suster