

FILED
U.S. DISTRICT COURT
DISTRICT OF COLORADO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

2021 FEB -8 PM 4: 32

JEFFREY P. COLWELL
CLERK

BY _____ DEP. CLK

_____)
)
JANE DOE)
)
Plaintiff,)
v.)
)
PAUL WANG)
)
Defendant.)
_____)

Civil Action No.
1:20-cv-02765-RBJ-MEH

ANSWER,
MOTION TO DISMISS,
MOTION FOR SUMMARY JUDGEMENT,
AND COUNTERCLAIM

COMES NOW THE DEFENDANT AND, RESPONDING TO THE ALLEGATIONS OF THE COMPLAINT,
RESPONDS AS FOLLOWS:

I. GENERAL DENIAL

1. Each and every allegation of the Complaint not specifically admitted is hereby denied, and strict proof is demanded thereof.
2. Paragraph 1 is neither admitted nor denied.
3. Paragraph 2 is admitted to the extent that it alleges Defendant is a citizen of the State of Colorado.
4. Paragraph 5 is admitted.
5. Paragraph 6 is admitted.
6. Paragraph 7 is admitted only to the extent of admitting that for several months in 2013 Plaintiff and Defendant were involved in a romantic relationship.
7. Paragraph 11 is admitted only to the extent that it is admitted Plaintiff came to the USA in July of 2013, at the invitation of Defendant, and that the relationship ended after one month (during August of 2013, when Defendant broke up with Plaintiff).
8. Other than as stated above, Defendant either denies each and every fact stated or lacks information to verify the facts stated and therefore demands strict proof of every other allegation of the Complaint.

II. MOTION TO DISMISS (12(B)(6))

9. The Complaint fails to allege facts sufficient to state a claim upon which relief can be granted and, therefore, should be dismissed.

III. MOTION TO DISMISS (Statute of Limitations)

10. In addition to failing to state any facts establishing a claim upon which relief can be granted, this action falls outside the Limitations of Actions established by Colorado Revised Statute 13-80-102.

IV. MOTION TO DISMISS (Lack of Jurisdiction)

11. The facts as stated in the Complaint do not support diversity jurisdiction.

V. MOTION FOR SUMMARY JUDGMENT

12. Taking the facts as alleged in the light most favorable to Plaintiff, there are no facts stated in the Complaint which would support any cause of action against Defendant.

VI. RESPONSE AS TO COUNT ONE

13. Every allegation raised in Count One is denied.

14. Count One fails to state any facts which would support a claim upon which relief can be granted.

VII. RESPONSE AS TO COUNT TWO

15. Every allegation raised in Count Two is denied.

16. Count Two fails to state any facts which would support a claim upon which relief can be granted.

VIII. RESPONSE AS TO COUNT THREE

17. Every allegation raised in Count Three is denied.

18. Count Three fails to state any facts which would support a claim upon which relief can be granted.

IX. REQUEST FOR SANCTIONS AND ATTORNEY FEES

19. In 2013, Plaintiff stole a private photograph from the home of Defendant and altered the photograph to make it look as though Defendant were engaged in lewd acts.

20. In 2013, Plaintiff attempted to blackmail Defendant by threatening to send the doctored photo to Defendant's friends and employer.

21. When Defendant refused to comply with Plaintiff's demands, Plaintiff did send the photograph to the employer of Defendant, for the purpose of harming Defendant.

22. Although Defendant did not pursue action against Plaintiff at that time, Defendant later learned that Plaintiff had done similar things to several other men.

23. In the summer of 2020, Defendant received a demand from Plaintiff for payment of Nine Hundred Thousand Dollars (\$900,000).

24. After receiving this letter, Defendant became aware that Plaintiff has engaged in a pattern of similar harassment of other men, both by attempting to blackmail them and by engaging in lawsuits alleging tortious conduct.

25. The present legal action has no basis in fact, continues a pattern of abuse, is deceitful, has been brought for the sole purpose of harassment and intimidation, and is an abuse of process and an attempt to extort money from Defendant.

26. As the result of Plaintiff's intentional and malicious pursuit of the baseless allegation in this Complaint, Defendant has been forced to incur attorney fees and has suffered emotional and mental distress.

27. Defendant requests that this Court award him attorney fees, costs, and punitive damages.

Respectfully submitted this 8th Day of February, 2021.



Paul Wang
8935 Southurst Street
Highlands Ranch, CO 80129

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OFFICIAL BUSINESS

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DOE v WANG

Answerst Defendant

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