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2021-Jul-30 15:10:42
65CV-21-20
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IN THE CIRCUIT COURT OF SEARCY COUNTY, ARKANSAS CIVIL DIVISION

MICHAEL PIETRCZAK

PLAINTIFF

V. CASE NO. 65CV-21-20

RURAL REVIVAL LIVING TRUST; AND LAURA LYNN

DEFENDANTS

PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION FOR CONTINUANCE

Comes now the Plaintiff, via the attorney, William Z. White, who in support of this Plaintiffs' Reply to Counter-Claimant Laura Lynn Hammett's Motion for Default Judgment and Brief in Support Thereof and allege as follows:

- 1. Plaintiff admits the allegations contained within paragraph one (1) of Defendants Motion.
- 2. Plaintiff denies the allegations contained within paragraph two (2) of Defendants Motion.
- 3. Plaintiff denies the allegations contained within paragraph three (3) of Defendants Motion.
- 4. Plaintiff denies the allegations contained within paragraph four (4) of Defendants Motion.
- 5. Plaintiff denies the allegations contained within paragraph five (5) of Defendants Motion.
- 6. Plaintiff denies the allegations contained within paragraph six (6) of Defendants Motion.

- 7. Plaintiff denies the allegations contained within paragraph seven (7) of Defendants Motion.
- 8. Plaintiff denies the allegations contained within paragraph eight (8) of Defendants Motion.
- 9. Plaintiff denies the allegations contained within paragraph nine (9) of Defendants Motion.
- 10. Plaintiff denies the allegations contained within paragraph ten (10) of Defendants Motion.
- 11. Plaintiff denies the allegations contained within paragraph eleven (11) of Defendants Motion.
- 12. Plaintiff denies the allegations contained within paragraph twelve (12) of Defendants Motion.
- 13. Plaintiff denies the allegations contained within paragraph thirteen (13) of Defendants Motion.
- 14. Plaintiff denies the allegations contained within paragraph fourteen (14) of Defendants Motion.
- 15. Plaintiff denies the allegations contained within paragraph fifteen (15) of Defendants Motion.
- 16. Plaintiff denies the allegations contained within paragraph sixteen (16) of Defendants Motion.
- 17. Plaintiff denies the allegations contained within paragraph seventeen (17) of Defendants Motion.

- 18. Plaintiff denies the allegations contained within paragraph eighteen (18) of Defendants Motion.
 - 19. Plaintiff denies all allegations contained in Defendants Wherefore paragraph.

WHEREFORE, the Plaintiff respectfully request that the Court: (1) deny Defendant's Motion for Continuance; and (2) award the Plaintiff all other legal, equitable and proper relief to which the Plaintiff may be entitled whether specifically prayed for herein or not.

Respectfully Submitted on Behalf of the Plaintiffs, Michael Pietrczak

By: <u>/s/ William Zac White</u>

William "Zac" White – Attorney & Counselor at Law William Z. White (AR Bar No. 2007255)
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CERTIFICATE OF SERVICE

I, William Z. White, hereby certify that a true and correct copy of the foregoing pleading
has been served upon opposing counsel of record and/or other interested parties in this case as set
forth below either by \square hand delivery, \square facsimile, \boxtimes email, \square electronic mail, auto
notification via the Court's ECF/E-File System other delivery methods,
and/or depositing a copy of the same with the U.S. Postal Service with sufficient postage to
arrive at its destination, addressed to the following:
Laura Lynn Hammett 16 Gold Lake Clube Road Conway, AR 72032 Bohemian_books@yahoo.com
Dated: Friday, July 30, 21 /s/ William Zac White William Z. White