

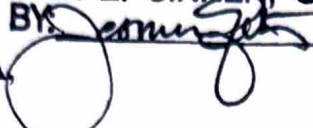
VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

MICHAEL JETER,
Plaintiff,

FILED
CLERK'S OFFICE
VA BEACH CIRCUIT COURT

FEB 27 2026

v.

TINA E. SINNEN, CLERK
BY:  **D.C.**

CASE NO. CL25005869-00

ALEJANDRO PERALTA,
Defendant.

DEMURRER AS TO PLAINTIFF'S DAMAGES

1. Plaintiff fails to state a cause of action for punitive damages, and this should be struck from the Complaint.

WHEREFORE, Defendant Peralta respectfully requests this Honorable Court to sustain his Demurrer and dismiss with prejudice the plea for punitive damages Complaint for failure to state cause of action for damages.

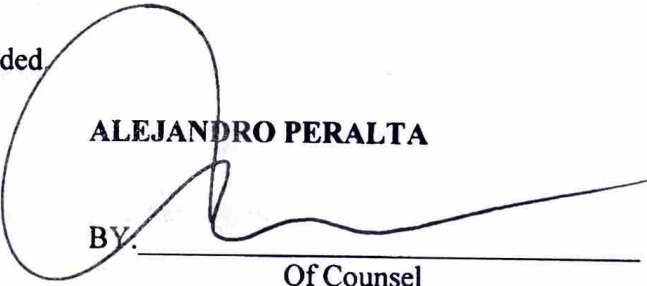
ANSWER TO COMPLAINT

NOW COMES the Defendant, **Alejandro Peralta**, by counsel, and in response to the Complaint filed herein, answers and says as follows:

1. That he denies all of the material allegations of the Plaintiff's Complaint and calls for strict proof thereof.
2. That he denies that he was guilty of any negligence and denies that he was guilty of any negligence proximately causing injuries and damages to the Plaintiff.
3. That subject to the above, and with the recognition that additional activity, discovery, and investigation may develop other facts, it is alleged that the Plaintiff was guilty of primary negligence.

4. That subject to the above, and with the recognition that additional activity, discovery and investigation may develop other facts, it is alleged that the Plaintiff was guilty of contributory negligence.
5. That subject to the above, and with the recognition that additional activity, discovery and investigation may develop other facts, it is alleged that the Plaintiff assumed the risk.
6. That he reserves the right to rely on all properly provable defenses at trial.
7. That he reserves the right to alter, amend, or otherwise modify these pleadings as the facts and circumstances may warrant.
8. That he denies that the Plaintiff sustained the injuries and damages alleged in the Complaint, and it is denied that the Plaintiff is entitled to recover any sum of money in this action.
9. Trial by Jury is demanded.

ALEJANDRO PERALTA

BY. 

Of Counsel

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