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*Attorneys for Defendants Jeff Austin, Keith Green
and William Grundy*

**UNITED STATES DISTRICT COURT
District of Utah Central Division**

AXIS SURPLUS INSURANCE COMPANY, Plaintiff, v. ROBERT D. GERINGER, ET AL., Defendant.	Civil Action No. 2:14-cv-00244-DAK ANSWER OF JEFF AUSTIN, WILLIAM GRUNDY, AND KEITH GREEN TO AMENDED COMPLAINT FOR INTERPLEADER
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Jeffrey Austin, William Grundy, and Keith Green (collectively, "Defendants"), by and through counsel of record, answer the Complaint for Interpleader as follows:

1. Defendants admit the allegations in Paragraph 1, except that a Receiver for CAREIC, Trent Waddoups, filed a Chapter 11 petition on behalf of CAREIC.
2. Defendants admit the allegations in Paragraph 2.

3. Defendants admit the allegations in Paragraph 3.

4. Defendants admit the allegations in Paragraph 4.

5. Defendants admit the allegations in Paragraph 5.

6. Defendants admit the allegations in Paragraph 6.

7. Defendants admit the allegations in Paragraph 7.

8. Defendants admit the allegations in Paragraph 8, except that Mr. Cochran remained as CEO of CAREIC after May 15, 2007.

9. Defendants admit the allegations in Paragraph 9.

10. Defendants admit the allegations in Paragraph 10.

11. Defendants admit the allegations in Paragraph 11.

12. Defendants admit the allegations in Paragraph 12.

13. Defendants admit the allegations in Paragraph 13.

14. Defendants admit the allegations in Paragraph 14.

15. Defendants admit the allegations in Paragraph 15.

16. Defendants admit the allegations in Paragraph 16.

17. Defendants admit the allegations in Paragraph 17.

18. Defendants admit the allegations in Paragraph 18.

19. Defendants admit the allegations in Paragraph 19.

20. Defendants admit the allegations in Paragraph 20, except that a Receiver, Trent Waddoups, filed a Chapter 11 petition on behalf of CAREIC.

21. Defendants admit the allegations in Paragraph 21.

22. Defendants admit that the Trustee made demands, but deny that they engaged in any wrongdoing whatsoever. Defendants lack sufficient information or belief to answer the remaining allegations in said Paragraph, and for that reason, deny those remaining allegations.

23. Defendants admit that the Trustee provided them with a draft Complaint, but deny all allegations of wrongdoing in that draft Complaint.

24. Defendants admit that the Trustee provided them with a draft Complaint, but deny all allegations of wrongdoing in that draft Complaint.

25. Defendants admit that the Trustee sought damages in his draft Complaint, but deny all allegations of wrongdoing in that draft Complaint.

26. Defendants admit the allegations in Paragraph 26.

27. Defendants admit the allegations in Paragraph 27.

28. Defendants admit that the Trustee filed the lawsuit referenced in this Paragraph and sought the relief requested therein, but Defendants deny all allegations of wrongdoing in the lawsuit.

29. Defendants admit that the Trustee filed the adversary proceeding referenced in this Paragraph and sought the relief requested therein, but Defendants deny all allegations of wrongdoing in the lawsuit. The District Court has withdrawn the reference of this adversary proceeding to the Bankruptcy Court.

30. Defendants admit that the Trustee filed the adversary proceeding referenced in this Paragraph and sought the relief requested therein, but Defendants deny all allegations of wrongdoing in the lawsuit.

31. Defendants admit the allegations in Paragraph 31.

32. Defendants admit the allegations in Paragraph 32.

33. Defendants admit the allegations in Paragraph 33.

34. Defendants admit the allegations in Paragraph 34.

35. Defendants admit the allegations in Paragraph 35.

36. Defendants admit the allegations in Paragraph 36.

37. Defendants lack sufficient information or belief of the allegations in Paragraph 37, and for that reason, denies each and every allegation contained therein.

38. Defendants admit the allegations in Paragraph 38.

39. Defendants admit the allegations in Paragraph 39.

40. Defendants admit the allegations in Paragraph 40.

41. Defendants incorporate their responses to Paragraphs 1 through 40 in response to Paragraph 41.

42. Defendants admit the allegations in Paragraph 42.

43. Defendants lack sufficient information or belief of the allegations in Paragraph 43, and for that reason, denies each and every allegation contained therein.

44. Defendants admit the allegations in Paragraph 44.

45. Defendants admit the allegations in Paragraph 45.

46. Defendants admit the allegations in Paragraph 46.

47. Defendants admit the allegations in Paragraph 47.

48. Defendants admit the allegations in Paragraph 48.

49. Defendants deny certain of the relief requested by AXIS, including without limitation AXIS' request for its fees and costs in bringing the action, and thus deny the allegations in Paragraph 49.

WHEREFORE, Defendants agree to participate in the interpleader of all claims against the remaining funds held by AXIS in the CAREIC matter.

Dated: June 11, 2015.

PERKINS COIE LLP

/s/ David F. Olsky

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CERTIFICATE OF SERVICE

On this 11th day of June, 2015, I caused a true copy of the ANSWER OF JEFF AUSTIN, WILLIAM GRUNDY, AND KEITH GREEN TO AMENDED COMPLAINT FOR INTERPLEADER to be filed with the Clerk of the Court using the CM/ECF system which will automatically send email notifications of such filing to all counsel who have entered an appearance in this action.

/s/ David F. Olsky