

STATE OF MINNESOTA
COUNTY OF BECKER

IN DISTRICT COURT
SEVENTH JUDICIAL DISTRICT
Case Type: Other Civil

Alpha News,

Plaintiff,

v.

ANSWER

City of Detroit Lakes;
Detroit Lakes Police Department;
Glori French, in her official capacity as
responsible authority for the City of
Detroit Lakes,

Defendants.

Court File # 03-CV-24-706

ANSWER

Defendants, for their Answer to Plaintiff's Complaint, state and allege as follows:

1. Except as hereinafter admitted, qualified, or otherwise explained these answering Defendants deny each and every allegation, matter and thing contained in said Complaint.
2. Admits the allegations contained in paragraphs numbered 1, 10, 13, 16, 17, 18 and 64.
3. Defendant affirmatively alleges that the recitations contained in paragraphs numbered 19, 20, 21, 40, 67, 68, 69, 70, 71, 72, 73, 74, 75 of the Complaint are legal conclusions to which no responsive pleading is required.
4. Defendant is without sufficient information to admit or deny the substance of paragraphs numbered 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 14, 15, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 65, 66, 76, 77, 78, 79, 80 and 81 of the Complaint and therefore denies the same, and puts Plaintiff to its proof.

AFFIRMATIVE DEFENSES

5. Pending further discovery and investigation, Defendants preserve all defenses and affirmative defenses pursuant to Rules 8, 9 and 12 of the Minnesota Rules of Civil Procedure.

WHEREFORE, These answering Defendants request an Order as follows:

1. For the Court to review the requested data in camera and consider whether there is any benefit to the public by granting Plaintiff's request, and whether any such benefit to Plaintiff outweighs any harm to the public or to the person identified in the data.
2. For whatever other relief the Court may deem just and equitable under the circumstances.

Dated this 30 day of April, 2024.

RAMSTAD, SKOYLES, WINTERS & BAKKEN, P.A.



BY: Dylan Ramstad Skoyles
Assistant City Attorney
Attorney for the above named Defendants
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Detroit Lakes, MN 56501
(218) 847-5653
Attorney Reg. No. 0403724

ACKNOWLEDGMENT

The undersigned and the party I represent hereby acknowledge that sanctions may be imposed pursuant to MS. §549.211, subd. 2. I hereby certify that to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances:

- (1) This document is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- (2) The claims, defenses and other legal contentions are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
- (3) The allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) The denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on a lack of information and belief.

Dated: 4/30/24

