

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

NATASHA MARIE CERVI,

Plaintiff,

vs.

Case No. 09-105835-DO  
Hon. Maria L. Oxholm

RICARDO ANTONIO ROSSELLO,

Defendant.

**GIARMARCO, MULLINS & HORTON, P.C.**

BY: MARK S. PAPA ZIAN (P24110)  
JEFFREY J. FRANKLIN (P71589)

Attorneys for Plaintiff  
101 W. Big Beaver Road, 10<sup>th</sup> Floor  
Troy, MI 48084  
(248) 457-7000

**HAINER & BERMAN, P.C.**

BY: KAY E. MALANEY (P39371)

Attorneys for Defendant  
24255 W. 13 Mile Road, Suite 270  
Bingham Farms, MI 48025  
(248) 642-4100



**ANSWER AND AFFIRMATIVE DEFENSES**

Defendant, Ricardo A. Rossello, by and through his attorneys, Hainer & Berman, P.C., for his Answer to the Verified Complaint for Annulment, states:

1. Admit.
2. Admit.
3. Admit.

4. Admit.
  5. Admit.
  6. Admit.
  7. Denied as untrue.
  8. Denied as untrue that Defendant has a paramour.
  9. Defendant lacks knowledge or information sufficient to form a belief as to the truth thereof.
  10. Defendant admits he had romantic relationships with various women before he was married. Defendant denies as untrue that he has had any romantic relationship with any women other than Plaintiff after the marriage.
  11. Denied as untrue.
  12. Defendant admits that Plaintiff and her family contributed financially to the wedding.
- The remaining allegations are denied as untrue.
13. Denied as untrue.
  14. Defendant denies there was any fraudulent behavior. The remaining allegations are neither admitted nor denied for the reason that Defendant lacks knowledge or information sufficient to form a belief as to the truth thereof.
  15. Denied as untrue. In further answer, Plaintiff took over \$33,000 and closed the parties' joint savings account when she left, half of which belongs to Defendant.
  16. Neither admit nor deny for the reason that Defendant lacks knowledge or information sufficient to form a belief as to the truth thereof.

WHEREFORE, Defendant requests this Court dismiss this action and award Defendant his costs and attorneys fees for having to defend this action.

**HAINER & BERMAN, P.C.**



BY: KAY E. MALANEY (P39371)  
Attorneys for Defendant  
24255 W. 13 Mile Road, Suite 270  
Bingham Farms, MI 48025-4322  
(248) 642-4100


DATE: June 10, 2009

**AFFIRMATIVE DEFENSES**

Defendant, Ricardo A. Rossello, by and through his attorneys, Hainer & Berman, P.C., for his Affirmative Defenses, states:

1. Plaintiff has failed to state a claim upon which the requested relief can be granted.
2. The marriage is valid and there is no legal basis for this Court to grant Plaintiff an annulment.

**HAINER & BERMAN, P.C.**



BY: KAY E. MALANEY (P39371)  
Attorneys for Defendant  
24255 W. 13 Mile Road, Suite 270  
Bingham Farms, MI 48025-4322  
(248) 642-4100

DATE: June 10, 2009

**PROOF OF SERVICE**

I certify this document was served on all parties to this action by depositing a copy in the U.S. Mail, postage prepaid, in envelopes addressed to each of the parties or attorneys of record at their last known address on June 10, 2009.

  
Amyleebeth K.D. Szostek

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