

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

MYRNA COLÓN-MARRERO

Plaintiff

V.S.

HÉCTOR CONTY-PÉREZ, et al

Defendants

CIVIL CASE NO.: 12-1749 (CCC)

VOTING RIGHTS

ANSWER TO THE COMPLAINT

TO THE HONORABLE COURT:

COMES NOW co-defendant **Eder Ortiz-Ortiz**, in his official capacity as Electoral Commissioner of the Popular Democratic Party through the undersigned attorney and very respectfully, **SETS FORTH** and **PRAYS**:

I. FACTUAL PLEADINGS

1. Insofar the appearing party agrees with plaintiff that she is entitled to relief under the causes of action pled in the complaint, all factual pleadings are admitted. Likewise, the appearing party waives his right to personally served in this action and voluntarily submits to this Honorable Court's *in personam* jurisdiction.

II. AFFIRMATIVE DEFENSES

2. Because of the appearing party's express consent to the filing of this action, there are no affirmative defenses to be raised. **Furthermore, the appearing co-defendant intends to file a brief before the Court of Appeals, in support of plaintiff's position, in the interlocutory appeal that was filed yesterday against the denial of preliminary injunctive relief.**

WHEREFORE it is respectfully requested from this Honorable Court that the relief sought in the Complaint be hereby **GRANTED**.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record

to their respective registered e-mail addresses. Any non-registered attorneys and/or parties will be served via regular mail.

In San Juan, Puerto Rico this 19th day of September, 2012.

RESPECTFULLY SUBMITTED,

PEDRO E. ORTIZ ÁLVAREZ, LLC

P.O. Box 9009
Ponce, Puerto Rico 00732
Tel (787) 841-7575; 758-9356
Fax (787) 841-0000; 758-9243

S/ Jorge Martínez Luciano

JORGE MARTINEZ LUCIANO

USDC-PR Number 216312
e-mail: squalus@rocketmail.com