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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MELISA INGRAM, et al.

Plaintiffs, Civil Action No. 20-10288  
v. Honorable George Caram Steeh  
Magistrate Judge Elizabeth A. Stafford

COUNTY OF WAYNE,

Defendant.

**ANSWER TO FIRST AMENDED COMPLAINT**

County of Wayne (“Defendant”), by and through its counsel Dykema Gossett PLLC, for its Answer to Plaintiff’s First Amended Complaint and Affirmative Defenses, states as follows:

## INTRODUCTION

1. This civil-rights lawsuit challenges the constitutionality of Wayne County's vehicle seizure and civil forfeiture practices.

**ANSWER:** Defendant specifically denies all allegations of wrongdoing and lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph.

2. Named Plaintiffs Melisa Ingram, Stephanie Wilson, and Robert Reeves are lifelong Detroiters who represent a class of similarly situated individuals seeking declaratory and injunctive relief based on the county's systematic violation of rights guaranteed by the Fourth, Eighth, and Fourteenth Amendments to the U.S. Constitution.

**ANSWER:** Denied as untrue.

SYKEMA GOSSETT PLLC • 400 Renaissance Center, Detroit, Michigan 48243