

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

FIRST BANK & TRUST

\* CIVIL ACTION NO: 12-2265 G(3)

VERSUS

\* JUDGE: HON. NANNETTE J BROWN

\* MAG: HON. DANIEL E. KNOWLES, III

GULF COAST BANK & TRUST,  
MILLICENT B. JONES,  
JAMES C. MURPHY, III,  
JAMES A. LAJAUNIE, JR.,  
AND MUDBUG MEDIA, INC.

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**GULF COAST BANK & TRUST, MILLICENT B. JONES, JAMES C. MURPHY, III,  
JAMES A. LAJUANIE, JR.’S JOINT ANSWER TO FIRST BANK & TRUST’S  
AMENDED PETITION**

Gulf Coast Bank & Trust (hereinafter “Gulf Coast”), Millicent B. Jones, James C. Murphy, III, and James A. Lajuanie, Jr., (hereinafter collectively known as the “Individual Defendants”), who in Joint Answer to First Bank & Trust’s (hereinafter “First Bank”) Amended Petition, respectfully state as follows:

1-18.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses to ¶¶ 1-18 of the Petition as if repeated herein *in extenso*.

19.

The allegations contained in Paragraph 19 of the amended petition are denied as stated.

20-22.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses for ¶¶ 20-22 of the Petition as if repeated herein *in extenso*.

23.

The allegations contained in ¶ 23 are denied as stated.

24-25.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses to ¶¶ 24-24 of the Petition as if repeated herein *in extenso*.

26.

The allegations contained in ¶ 26 are denied as stated.

27- 50.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses to ¶¶ 27-50 of the Petition as if repeated herein *in extenso*.

51.

The allegations contained in ¶ 51 are denied.

52-81.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses to ¶¶ 52-81 of the Petition as if repeated herein *in extenso*.

**ANSWER TO THE WHOLLY NEW ALLEGATIONS OF THE AMENDED PETITION**

**COUNT 8: MISAPPROPRIATION**

82.

The allegations contained in ¶ 82 of the petition are answered in line with how they were answered previously.

83.

The allegations contained in ¶ 83 are denied.

84.

The allegations contained in ¶ 84 are denied.

85.

The allegations contained in ¶ 85 are denied.

86.

The allegations contained in ¶ 86 are denied.

87.

The allegations contained in ¶ 87 are denied.

88.

The allegations contained in ¶ 88 are denied.

**COUNT 9: MISAPPROPRIATION OF TRADE SECRETS BY MUDBUG MEDIA, INC.**

89.

The allegations contained in ¶ 89 of the petition are answered in line with how they were answered previously.

90.

The allegations contained in ¶ 90 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 90 are denied.

91.

The allegations contained in ¶ 91 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 91 are denied.

92.

The allegations contained in ¶ 92 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 92 are denied.

93.

The allegations contained in ¶ 93 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 93 are denied.

94.

The allegations contained in ¶ 94 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 94 are denied.

95.

The allegations contained in ¶ 95 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 95 are denied.

96.

The allegations contained in ¶ 96 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 96 are denied.

97.

The allegations contained in ¶ 97 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 97 are denied.

**COUNT 10: BREACH OF CONTRACT**

98.

The allegations contained in ¶ 98 of the petition are answered in line with how they were answered previously.

99.

The allegations contained in ¶ 99 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 99 are denied.

100.

The allegations contained in ¶ 100 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 100 are denied.

101.

The allegations contained in ¶ 101 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 101 are denied.

102.

The allegations contained in ¶ 102 do not pertain to Gulf Coast or the Individual Defendants and therefore no answer is necessary. However, in the interests of caution the allegations contained in ¶ 102 are denied.

103.

Gulf Coast and the Individual Defendants incorporate and reiterate their responses in furtherance of the Original Petition and Affirmative Defenses found originally in ¶¶ 82-85 of their First Amended Answer as if repeated herein *in extenso*.

**WHEREFORE**, Gulf Coast and the Individual Defendants pray that their joint answer to First Bank's Amended Petition be deemed good and sufficient and that after due proceedings have there be judgment herein in their favor against First Bank dismissing all claims and requested relief made by it with prejudice and for all attorney's fees and costs of these proceedings. Gulf Coast and the Individual Defendants further pray for all equitable and general relief they may be entitled.

RESPECTFULLY SUBMITTED,

**RICCI PARTNERS, LLC**

\s\ Jack A. Ricci

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*Attorneys for Gulf Coast Bank & Trust and  
the Individual Defendants*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading has been served upon all counsel of record to this proceeding by ECF, facsimile, or mailing the same by first class United States mail, postage prepaid on this 14th day of May, 2013.

/s/ Jack A. Ricci