

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE, MISSOURI**

SAMUEL K. LIPARI, et al.,	)	
	)	
Plaintiffs,	)	
	)	Case No: 0616-CV07421
vs.	)	
	)	Division 5
	)	
GENERAL ELECTRIC COMPANY, et al.,	)	
	)	
Defendants	)	

**MOTION TO DISMISS  
GENERAL ELECTRIC DEFENDANTS AFFIRMATIVE DEFENSES**

Comes now the petitioner, SAMUEL K. LIPARI appearing *pro se* and respectfully requests that the court dismiss GENERAL ELECTRIC COMPANY, GENERAL ELECTRIC CAPITAL BUSINESS ASSET FUNDING CORPORATION and GE TRANSPORTATION SYSTEM GLOBAL SIGNALING, L.L.C. (collectively the "GE defendants") assertions of affirmative defenses for failure to adequately state a defense at law.

The GE Defendants in a motion to dismiss filed as the GE Defendants' first responsive pleading, a motion to dismiss the petitioner's claims, asserted the existence of two affirmative defenses which are invalid at law.

The petitioner has separately provided a suggestion in support of the present motion.

Respectfully Submitted,

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Pro se

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was forwarded this 14th day of June, 2006, by first class mail postage prepaid to:

John K. Power, Esq. Husch & Eppenberger, LLC 1700 One  
Kansas City Place 1200 Main Street Kansas City, MO  
64105-2122

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