STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
08 CVD 12310

2008 SEP 11 PM 1:52
WAKE COUNTY, C.S.C.

BY_____

GARRY D. RENTZ, DONNA A. RENTZ, KRISTA C. LISTER	)	
	)	**ANSWER**
v.	)	
BRADLEY COOPER	)	

NOW COMES Defendant Brad Cooper (hereinafter "Brad"), by and through his attorneys of record, in the above-entitled action, answering Plaintiffs' Complaint filed against him as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. It is admitted that Garry and Donna Rentz are the biological parents of Nancy Cooper. It is also admitted that Nancy Cooper (hereinafter "Nancy") is Brad's deceased wife and the identical twin sister of Plaintiff Lister. All remaining allegations are denied.

5. It is admitted that at the time Plaintiffs filed their complaint and motion for emergency custody order, Brad, as the biological father, with superior rights to all third parties, had physical and legal custody of the minor children.

6. Brad does not have sufficient knowledge or information to admit or deny the allegations contained in paragraph 6 of Defendant's complaint; therefore they are denied. It is specifically denied that any action was pending before the court regarding child custody of the minor children at any time prior to the filing of this action.

7. The allegations set forth in paragraph 7 of Plaintiffs' complaint are factually true as written.

As further response, Defendant is legally working and living in the United States pursuant to a H1 B Visa and is currently in the process of obtaining permanent residency status. Isabella and Gabriella Cooper are United States citizens.

8. The allegations in paragraph 8 are denied as written. In further response, Brad contacted friends and neighbors on the afternoon of July 12, 2008, reporting that Nancy was missing and asking if anyone had seen her or had information related to her whereabouts. Brad was driving around searching for Nancy when Cary Police called his cell phone. He informed Cary Police that Nancy was indeed missing, provided them with information and enlisted their help to find her. He gave them unrestricted access to their home, computer and belongings. While Brad was working with Cary Police to try to find Nancy, a friend and neighbor offered to call Brad's parents and the Plaintiffs Rentzes to let them know what was happening, and Brad gratefully accepted the offer.

9. The allegations contained in paragraph 9 of Plaintiffs' complaint are denied. As a further response, Brad asserts that Nancy told him she was going jogging on the morning and July 12, 2008 and left the house at approximately 7:00 a.m.; however, Brad has no way of knowing whether she actually went jogging on that morning. Brad denies that he was the last person to see Nancy alive.

10. The allegations contained in paragraph 10 are neither admitted nor denied in that Brad has been informed by the police that Nancy's death has been ruled a homicide and that her body was discovered by a third party; however, Brad believes those allegations to be true based on these representations made by police. Brad has been denied all access to any autopsy report and any investigation into the murder of his wife.

11. There is no allegation on the complaint numbered as 11; therefore any alleged allegation contained in the non-existent paragraph is denied.

12. Denied.

13. Defendant hereby moves this court for an order striking paragraph 13 of Plaintiff's complaint in that the allegation is irrelevant, immaterial, impertinent and scandalous filed for the sole matter of creating undue bias with both the court and the press and to inflame the trier of fact and the public. Subject to Defendant's motion to strike, the allegations are denied. Brad provided very well for Nancy and their children. Nancy was not permitted to work in the United States because she had not applied for or received the appropriate permit/visa. Brad paid all the bills and expenses for the house and family. On top of that, Brad gave Nancy $300.00 a week spending money, which was more than eighty percent (80%) of what was left over after paying their bills.

14. Defendant hereby moves this court for an order striking paragraph 14 of Plaintiff's complaint in that the allegation is irrelevant, immaterial, impertinent and scandalous filed for the sole matter of creating undue bias with both the court and the press and to inflame the trier of fact and the public. Subject to Defendant's motion to strike, it is admitted that Defendant had a single one night indiscretion approximately three years ago; however it is denied that Defendant engaged in any ongoing sexual relationship with any person besides Nancy Cooper.

15. While it is admitted that the police conducted investigative work at the marital residence, it is denied that the marital residence is a crime scene or currently being investigated. It is denied that Brad was asked to leave and that Brad was ever prohibited from returning to the marital residence. It is denied that the marital residence is an inappropriate place for the minor children to reside; there is nothing inappropriate about the residence.

16. Denied.

17. Denied.

18. Denied.

19. Denied. Plaintiffs Garry and Donna Rentz spent only a few weeks a year with the minor

children, and the minor children were always with Nancy and/or Brad during each of those times. The minor children love their grandparents, but they did not know them very well before the Plaintiffs took them using this action.

20. Brad does not have sufficient information to admit or deny whether Plaintiff Garry Rentz was an executive director for Alberta Social Services for five years. Brad did not know the Rentzes during that time and only knows that Garry Rentz claims to have worked there. Additionally, Brad does not know whether Plaintiff Garry Rentz's job involved actually working with children or families, as Social Services covers many areas including Goodwill Industries, public health, dependant adults (such as mentally-challenged) and families in poverty as well as boys and girls clubs. Logically, an executive director's duties and responsibilities would be vastly different than that of a counselor or social worker, who actually works with the public. Furthermore, Brad believes that Alberta's children's services is called "Alberta Children and Youth Services" (ACYS). Without sufficient information, Brad must deny that Plaintiff Gary Rentz worked with "Children's Services" for five years. Likewise, Brad does not have sufficient information to admit or deny whether the Rentzes have been married for forty-three (43) years or that they have owned and operated Personal Support and Development Network and Careers in Transition for the past twenty (20) years. Brad admits that the Rentzes have been married for the entire time he has known them and that they have operated said business during that time. Outside of that, Brad must deny for lack of sufficient information. Finally, Brad denies that Plaintiffs Rentzes have a stable home for the children. They have demonstrated that they cannot provide a stable environment for the children by separating the children from each other for several days at a time during the most traumatic time of their lives. The children's home is in the United States with their father. Any other allegations not herein admitted or denied are hereby denied.

21. Admitted in part and denied in part. Upon information and belief, Plaintiff Krista Lister had frequent telephone contact with Nancy. Brad does not have sufficient information whether Plaintiff Krista Lister had daily telephone contact with Nancy or with the minor children, so the same is denied. However, Plaintiff Krista Lister stated at a press conference that she had daily telephone contact with Nancy, and that Plaintiff Lister frequently heard the children in the background while speaking to Nancy. Katie is only two years old and can only speak a few words, such as "no," "yes," and "more." She does not really understand telephones and runs off to play with them. Prior to this action, the minor children had only seen Plaintiff Krista Lister a handful of times in the past two years, and the minor children were with Nancy and/or Brad during those times. It is admitted that the Listers have been married for seven years and that they both have the full-time occupations that are claimed in the complaint. All other allegations in paragraph 21 are denied.

22. Defendant has insufficient knowledge to know what the Plaintiffs believe; therefore the allegations are denied. It is specifically denied that the court should award any custodial rights to any person other than Brad who is the natural parent of the minor children.

23. Admitted in part. During the searches for Nancy, the meetings with the Cary Police, and one press conference where the Plaintiffs were also present, the children had play dates with friends and neighbors with whom they were accustomed and/or who had other children for them to play with. Plaintiffs asked to spend time with the minor children, and Brad willingly arranged for the children to see the Plaintiffs and spend time with them. Usually, the minor children would have been at pre-school during the day, or at play dates with those same friends and neighbors, or running errands with their mother. It would not have been in the children's best interests to attend press conferences or to meet with the Cary Police. Brad was acting in the best interests of the children by trying to keep them safe and distracted from the circumstances surrounding their

29. Denied.

30. The answers to paragraphs 1 through 29 above are incorporated by reference as if fully set forth herein.

31. This is not an allegation; therefore no answer is required, except that these circumstances did not support any emergency award of custody. Any other allegations not herein admitted or denied are hereby denied.

32. Denied.

33. Any other allegations not herein admitted or denied are hereby denied.

RESERVATION AND NON-WAIVER

Defendant reserves the right to assert additional affirmative defenses as further facts are revealed through discovery and at trial, and does not waive any affirmative defenses not specifically asserted herein.

RESERVATION OF RIGHTS

Defendant expressly reserves the right, pursuant to N.C.G.S. Section 1A-1, 42, to move the Court to order a separate trial of the Plaintiff's issues asserted against him in this action.

WHEREFORE, Defendant prays that the Court:

1. Accepts this verified pleading as an affidavit upon which the Court may base its further orders in this matter.

2. Dismisses each of Plaintiffs' claims.

3. Denies all relief sought by Plaintiffs.

4. Returns custody of the minor children to Defendant, immediately.

5. Preserves Defendant's defenses and affirmative defenses and grants Defendant relief from

mother's disappearance. Brad fed the children breakfast and got them dressed. He took them to the neighbor's or friend's houses for a few hours, and he picked them up. Brad gave them baths, got them ready for bed, read them stories, and put them to bed. He tried to maintain the children's routines because that was what was best for the children. Plaintiffs held multiple press conferences during which they would also have left the children with someone else to care for them. Any other allegations not herein admitted or denied are hereby denied.

24. It is admitted that Brad removed the children's passports from the BMW. Important legal documents, such as passports, should not kept in cars. It is denied that the BMW belonged only to Nancy. As they were married, the BMW belonged to both Brad and Nancy. Nancy usually drove it, but she often had Brad go get gas in it for her and run household errands.

25. It is admitted that Brad and Nancy discussed moving to Canada if Brad could obtain a job with Cisco in Canada; however, after he could not find a job with Cisco, the parties decided to remain in the United States and Nancy began plans to begin her own personal shopping business in North Carolina.

26. It is denied that Brad took any action to deprive Nancy of her ability to travel from the United States. Both Brad and Nancy objected to either parent taking the children out of the United States without the consent of the other. Brad offered a compromise solution to allow each parent to keep one passport in an effort to provide assurance that neither parent would try to take the children from the United States without the consent of the other.

27. The allegations contained in paragraphs 27(a) through 27(d) are admitted.

28. Denied. Absent a finding of unfitness or that he has acted inconsistently with his Constitutionally-protected status as a parent, Brad is entitled to custody of his children and a best interest analysis cannot be used.

this action based upon them.

6. Reserves Defendant's Reservations of Rights as described herein above.

7. Taxes the costs of this action, including attorney's fees, discovery fees, investigator fees, deposition costs and fees, and other expenses that Defendant incurs in the defense of this action to Plaintiffs.

8. Grants Defendant such other and further relief as the Court deems just and proper.

This is the 11 day of September, 2008.

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NORTH CAROLINA
WAKE COUNTY

VERIFICATION

Bradley Cooper, being first duly sworn, deposes and says that he is the Defendant in the above-entitled action, that he has read the foregoing document and knows the contents thereof; that the same are true of his own knowledge except as to those matters and things stated upon information and belief, and as to those things, he believes them to be true.

Bradley Cooper

SWORN TO AND SUBSCRIBED BEFORE
ME, A NOTARY PUBLIC, THIS THE
4th DAY OF September, 2008

NOTARY PUBLIC

MY COMMISSION EXPIRES: 10-09-2010

CERTIFICATE OF SERVICE

2008 SEP 11 PM 4:52
WAKE COUNTY, C.S.C.
BY

This is to certify that a copy of the foregoing document was duly served this day on all parties to this action by placing

[X] A copy thereof in a postage-paid envelope deposited in the United States Mail, addressed as follows:

Alice C. Stubbs
Wade M. Smith
Tharrington Smith, LLP
PO Box 1151
Raleigh, North Carolina 27602-1151

This the 11 of September, 2008.

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