

4

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

CAPRECE BYRD, BRYANT WATTS, and  
RENAE WHITE, individually, and on behalf  
of all others similarly situated,

Plaintiffs,

v.

VISALUS, INC., NICK SARNICOLA,  
ASHLEY SARNICOLA, BLAKE MALLEN,  
RYAN BLAIR, TODD GOERGEN, GARY J.  
REYNOLDS, and VINCENT OWENS

Defendants.

Case No. 4:17-CV-12626-MFL-DRG

Hon. Matthew F. Leitman



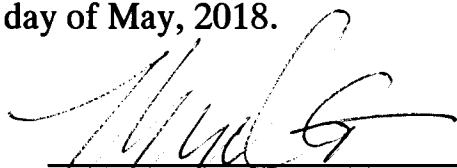
**ANSWER**

Vincent Owens ("Pro Se Defendant") hereby responds to the Second Amended Complaint filed on May 4, 2018 as follows:

- a. Allegations 1 - 19: Unknown or incorrect therefore denied.
- b. Allegations 20 - 21: Unknown or incorrect therefore denied.
- c. Allegation 22 - 28: Unknown or incorrect therefore denied.
- d. Allegations 29 - 41: Unknown or incorrect therefore denied.
- e. Allegations 42 - 48: Unknown or incorrect therefore denied.
- f. Allegations 49 - 269: Unknown or incorrect therefore denied.
- g. Allegations 270 - 336: Unknown or incorrect therefore denied.
- h. Allegations 337 - 351 (Count 1): Denied.

- i. Allegations 352 – 361 (Count 2): Denied.
- j. Allegations 362 - 368 (Count 3): Denied.
- k. Allegations 369 - 378 (Count 4): Denied.
- l. Allegations 379 - 387 (Count 5): Denied.
- m. Allegations 388 - 395 (Count 6): Denied.
- n. Allegations 396 - 404 (Count 7): Denied.
- o. Allegations 405 – 410 (Count 8): Denied.

Respectfully submitted this 15<sup>th</sup> day of May, 2018.



VINCENT OWENS, Pro Se  
1300 Jamaica Street  
Aurora Colorado 80010  
(720) 422-3297

CERTIFICATE OF MAILING

This document was sent to the Court (overnight) and the following parties (U.S. Mail, postage pre-paid), this 15<sup>th</sup> day of May, 2018.

U.S. District Court, Eastern District Michigan  
Clerk's Office  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 564  
Detroit MI 48226

SOMMERS SCHWARTZ, P.C.  
Andrew Kochanowski (P55117)  
One Towne Square, Suite 1700  
Southfield, Michigan 48076  
*Attorneys for Plaintiffs*

HONIGMAN MILLER SCHWARTZ AND COHN  
LLP  
Nicholas B. Gorga (P72297)  
660 Woodward Avenue  
2290 First National Building  
Detroit, MI 48226-3506

WEXLER WALLACE  
Edward A. Wallace (IL Reg. No.  
6230475)  
55 W. Monroe Street  
Suite 3300  
Chicago, Illinois 60603  
*Attorneys for Plaintiffs*

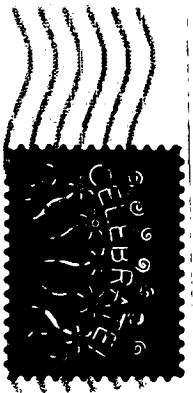
QUARLES & BRADY LLP  
Edward A. Salanga (AZ Bar #020654)  
2 North Central Avenue  
Renaissance One  
Phoenix, AZ 85004  
*Attorneys for Defendants ViSalus, Inc., Nick Sarnicola,  
Ashley Sarnicola, Blake Mallen, Ryan Blair, Todd  
Goergen, and Gary J. Reynolds*



VINCENT OWENS, Pro Se

DUENTS V.  
1300 JAMAICA ST  
AUBREY, CO  
80010

DENVER CO1502  
15 MAY 2018 PM 2 L  
ST/51K DP



RECEIVED  
MAY 18 2018  
CLERK'S OFFICE  
U.S. COURT HOUSE  
231 W. WAYNETTE BLVD. RM. 564  
DETROIT MI 48226

48226-271839

