

EXHIBIT 30

to the

**AFFIDAVIT OF RACHEL E. FUGATE IN SUPPORT OF THE PUBLISHER
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

Terry Bollea,

Civil File No.: 4-96-9

Plaintiff,

vs.

**ANSWER AND RESERVED
COUNTERCLAIM OF
DEFENDANT KATE KENNEDY**

Peter W. Johnson, Johnson &
Wood, P.A., and Kate Kennedy,

Jury Trial Demanded

Defendants.

Kate Kennedy, for her Answer to Plaintiff's Complaint, states and alleges as follows:

1. Unless specifically admitted, Kate Kennedy denies each allegation contained in Plaintiff's Complaint.

2. Kate Kennedy admits the factual allegations contained in the paragraphs 2, 3 and 5 of Plaintiff's Complaint.

3. Kate Kennedy admits generally the allegations of paragraph 1 of Plaintiff's Complaint, but specifically denies that the amount in controversy exceeds the sum of \$50,000.00.

4. Kate Kennedy admits generally the factual allegations of paragraph 4, but denies specifically that the letter attempted to extort money from Plaintiff, nor was that her intent or purpose.

5. On September 2, 1995 plaintiff wilfully, maliciously and forcibly placed his penis into Kate Kennedy's mouth against her will and despite her protestations.

6. Kate Kennedy retained the law firm of Johnson & Wood to represent her for a sexual assault claim against the plaintiff; she had no training or experience in such legal matters; she relied

FILED JUN 28 1996
FRANCIS E. DOSAL, CLERK
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(55)

solely and exclusively upon the advice given by her lawyers; she was led to believe that the letter sent to the plaintiff was the typical and usual way to proceed with such claims.

AFFIRMATIVE DEFENSES

7. Plaintiff has failed to state a cause of action upon which relief can be granted.

8. Plaintiff's claims are barred against Kate Kennedy by the doctrine of judicial immunity.

9. This court lacks jurisdiction over the subject matter of Plaintiff's claims.

RESERVED COUNTERCLAIM

Kate Kennedy reserves the right to seek leave of the court to interpose a counterclaim after initial discovery in order to determine whether said counterclaim is compulsory under Fed.R.Civ.P. 13(a).

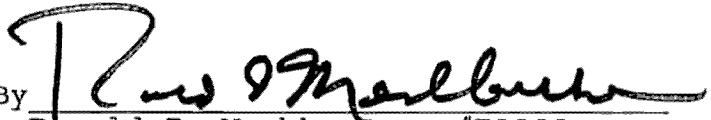
WHEREFORE, Kate Kennedy prays that Plaintiff's claims be dismissed with prejudice and that she be awarded her costs, including reasonable attorneys' fees pursuant to Fed.R.Civ.P. 11.

JURY DEMAND

Pursuant to Fed.R.Civ.P. 38(b) and Local Rule LR 38.01, Kate Kennedy demands a trial by jury on all issues so triable.

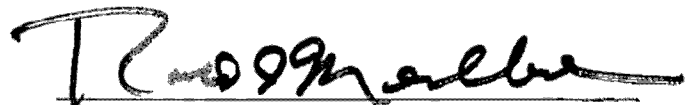
Dated: June 17, 1996

MESHBESHER & SPENCE, LTD.

By 
Ronald I. Meshbesh, #72229
Attorneys for Defendant Kennedy
1616 Park Avenue
Minneapolis, MN 55404
Telephone (612) 339-9121

ACKNOWLEDGEMENT

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. §549.21, subd. 2, to the party against whom the allegations in this pleading are asserted.


Ronald I. Meshbesh

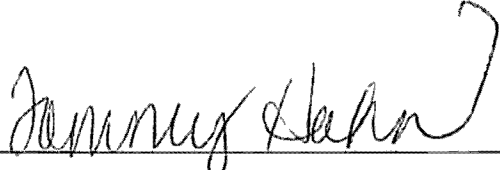
STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

AFFIDAVIT OF SERVICE BY MAIL


Tammy Hahn, of the City of Minneapolis, County of Hennepin, in the State of Minnesota, being duly sworn, says that on the 27th day of June, 1996, she served the annexed Answer and Reserved Counterclaim of Defendant Kate Kennedy on Geoffrey P. Jarpe, Esq. & Jerome B. Simon, Maun & Simon, 2300 World Trade Center, 30 East 7th Street, St. Paul, MN 55101, Attorneys for Plaintiff, and on Arlo H. Vande Vegte, Esq. 1850 W. Wayzata Boulevard, P.O. Box 39, Long Lake, MN 55356, attorneys for Defendants Johnson & Wood, P.A., by mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing same in the post office at Minneapolis, Minnesota directed to said attorneys at the address listed below, the last known address of said attorneys:

Geoffrey P. Jarpe, Esq.
Jerome B. Simon, Esq.
Maun & Simon
2300 World Trade Center
30 East 7th Street
St. Paul, MN 55101

Arlo H. Vande Vegte, Esq.
1850 W. Wayzata Boulevard
P.O. Box 39
Long Lake, MN 55356



Subscribed and sworn to before me
this 27th day of June, 1996.



Notary Public

