# Republic of the Philippines Province of Iloilo MUNICIPAL TRIAL COURT OF DUMANGAS Dumangas, Iloilo

Juan Dela Cruz

CIVIL CASE NO. For: Collection

Plaintiff,

-versus-

Andrew E Defendant.

Defendant.

## ANSWER TO THE COMPLAINT

COMES NOW defendant Andrew E , through the undersigned counsel and to this Honorable Court, most respectfully alleges:

 Defendant denies the allegations in the Promissory note that the defendant borrowed sum of money to the plaintiff in the amount of P150,000.00

Defendant denies the allegations in promissory note paragraph II.a of the complaint. The defendant only borrowed sum of money in the amount of P75,000.00.

Defendant denies the allegations contained in paragraph II.b of the complaint, the truth , the defendant already settled his obligations to the plaintiff.

4. Defendant admits the allegations in the promissory note of the complaint but the sum of money which was borrowed by defendant to the plaintiff was only P75,000 and the defendant was able to settle his obligations last March 21,2014 as evidenced by the receipts at the possession of the defendant.

#### AFFIRMATIVE DEFENSES

That plaintiff has no right to collect the amount of P 150,000.00
 from the defendant because the debt was only P75,000.00

 That whatever debt the defendant owes to the plaintiff was only P75,000.00 and it was already settled.

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**Benjamin Vaughan Abbott** 

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