

VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF VIRGINIA BEACH

IN RE: GENDER QUEER, A Memoir

CASE NO.: CL22-1985

**ANSWER**

NOW COMES Oni-Lion Forge Publishing Group, LLC, identified by misnomer in the petition as Lion Forge, LLC (hereinafter "Oni-LF"), by counsel, files this answer in response to the petition that has been filed herein.

1. Oni-LF is without sufficient information to admit or deny ¶1 of the petition filed herein.
2. Because Exhibit A was not served on Oni-LF, Oni-LF is without sufficient information to admit or deny ¶2 of the petition.
3. Oni-LF admits the portion of ¶3 of the petition alleging that Gender Queer is sold and distributed in the Hampton Roads region of Virginia through Barnes & Noble, Amazon and other entities and is available for home delivery to Virginia Beach residents. The remainder of ¶3 is denied.
4. Oni-LF is without sufficient information to admit or deny ¶4 of the petition.
5. Oni-LF denies ¶5 of the petition.
6. Oni-LF denies ¶6 of the petition.
7. Oni-LF denies ¶7 of the petition.
8. Anything not specifically admitted should be deemed denied, and Oni-LF calls for strict proof thereof.
9. Oni-LF denies that petitioner is entitled to any form of relief whatsoever.

10. Oni-LF denies that petitioner has adequately stated any cause of action or entitlement to relief.
11. Oni-LF affirmatively alleges that the petitioner lacks sufficient (or any) standing to proceed in this matter.
12. Oni-LF affirmatively alleges that the doctrine of laches bars petitioner from receiving the relief sought.
13. Oni-LF affirmatively alleges that the statute upon which petitioner relies and upon which this proceeding is based violates fundamental free speech and due process rights, both facially and as applied.

WHEREFORE, for the foregoing reasons, Oni-LF respectfully requests that this Honorable Court vacate the previously entered show cause order, dismiss the petition with prejudice and deny petitioner any relief whatsoever. Oni-LF requests such other and further relief as deemed appropriate under the circumstances of this matter.

ONI-LION FORGE PUBLISHING GROUP, LLC

By \_\_\_\_\_

Of Counsel

Kevin E. Martingayle, Esquire (VSB #33865)  
Ariel L. Stein, Esquire (VSB #84497)  
BISCHOFF MARTINGAYLE, P.C.  
3704 Pacific Avenue, Suite 300  
Virginia Beach, VA 23451  
(757) 233-9991  
(757) 428-6982 (facsimile)  
Email: [martingayle@bischoffmartingayle.com](mailto:martingayle@bischoffmartingayle.com)  
[stein@bischoffmartingayle.com](mailto:stein@bischoffmartingayle.com)

Michael K. Lowman, Esquire (VSB #41633)  
Armstrong Teasdale, LLP  
14001C St. Germain Drive, Suite 223  
Centreville, VA 20121  
(267) 780-2034  
Email: [MLowman@Atllp.com](mailto:MLowman@Atllp.com)

**CERTIFICATE**

I hereby certify that on this 15<sup>th</sup> day of June, 2022, a true copy of the foregoing was sent via electronic mail to Timothy Anderson, Esq., Kamala H. Lannetti, Deputy City Attorney, Dannielle Hall-McIver, Associate City Attorney, Craig T. Merritt, Esq., David B. Lacy, Esq., L. Steven Emmert, Esq., Jeff Trexler, Esq., Robert Corn-Revere, Esq., Laura R. Handman, Esq., Linda Steinman, Esq., and Amanda Levine, Esq.

  
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Kevin E. Martingayle