

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
CLARKSBURG DIVISION**

BETH A FOX, P.E.,

Plaintiff,

v.

Civil Action No. 1:25-cv-61 (Kleeh)

**CITY OF BRIDGEPORT,
a West Virginia Municipal Corporation, and
PATRICK B. FORD, individually and
as the Bridgeport City Manager,
LEON MARK ROGERS, JR., individually
and as the Bridgeport Interim City Manager,**

Defendants.

ANSWER OF PATRICK B. FORD

COMES NOW Defendant Patrick B. Ford (“Mr. Ford” or “this Defendant”), by counsel, Jeffrey S. Zurbuch, Bridgette R. Wilson, and the law firm of Busch, Zurbuch & Thompson, PLLC, and for his Answer to Plaintiff’s Complaint states as follows.

Introductory Statement

Mr. Ford hereafter states various affirmative defenses concerning Plaintiff’s claims that are alleged in the Complaint. These defenses are presented to preserve legal rights of this Defendant and sometimes are stated alternatively or hypothetically as they necessarily are based upon limited information available at this early stage of this litigation before any discovery has occurred. As such, this Defendant reserves the right to modify, withdraw, or supplement any stated defenses as may be appropriate based upon discovery and/or investigation in this action.

Without assuming the burden of proof as to any matter upon which Plaintiff bears the burden of proof, Mr. Ford states the following defenses:

First Affirmative Defense

The Complaint fails or may fail to state a claim upon which relief may be granted against Mr. Ford.

Second Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, states that the acts or omissions of a party or entity other than Mr. Ford caused or may have caused Plaintiff's alleged losses and damages, if any, as the same may prove applicable through discovery and the development of evidence in this case.

Third Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defenses of contributory and/or comparative negligence, assumption of risk, estoppel, waiver, laches, unclean hands, and failure to join an indispensable party under Rule 19 of the Federal Rules of Civil Procedure, as the same may prove applicable through discovery and the development of evidence in this case.

Fourth Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defense that Plaintiff has failed or may have failed to mitigate damages, if any, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Fifth Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defenses, immunities, and limitations on damages provided pursuant to The Governmental Tort Claims and Insurance

Reform Act, W. Va. Code § 29-12A-1, *et seq.*, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Sixth Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defenses that he is or may be entitled to qualified and good faith immunity against the claims alleged against him, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Seventh Affirmative Defense

This Defendant denies any and all allegations in the Complaint that allege or imply any discrimination, misconduct, negligence, gross negligence, carelessness, malice or other legal fault on his part, intentional or otherwise, or any violation by him of duty, or allegations that allege or imply that this Defendant violated any applicable statutes, rules, regulations, or standards whatsoever with respect to Plaintiff, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Eighth Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defense that the injuries and damages claimed by Plaintiff herein, if any, were proximately caused or brought about by persons or entities other than this Defendant, over whom this Defendant had no control and for whom he bears no responsibility, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Ninth Affirmative Defense

This Defendant, not being fully advised of all the circumstances surrounding the allegations set forth in the Complaint, asserts and reserves unto himself the defenses to the alleged claims of

defamation of truth, absolute privilege, qualified privilege, and opinion, as the same may prove applicable as discovery proceeds and evidence is developed in this case.

Tenth Affirmative Defense

This Defendant asserts and reserves unto himself the provisions of W. Va. Code § 55-7-29 concerning limitations on punitive damages and asserts that punitive damages are not recoverable against this Defendant pursuant to that statute.

Eleventh Affirmative Defense

To the extent Plaintiff's Complaint seeks punitive damages from this Defendant, said Complaint violates this Defendant's right to protection from excessive fines under Article III, § 5 of the Constitution of the State of West Virginia, violates this Defendant's right to substantive due process under the Constitution of the State of West Virginia and the United States Constitution, and fails to state a cause of action against this Defendant supporting a punitive damages claim.

Twelfth Affirmative Defense

To the extent Plaintiff's Complaint seeks punitive damages from this Defendant, this Defendant affirmatively asserts that the Complaint violates his right to equal protection under the law and is otherwise unconstitutional under the Fourteenth Amendment to the United States Constitution and Article III, § 1 of the Constitution of the State of West Virginia and all other applicable provisions thereof.

Thirteenth Affirmative Defense

No adverse employment action was taken against Plaintiff because of her exercising rights under the Family and Medical Leave Act ("FMLA"), and any action alleged to constitute adverse employment action, discrimination, or retaliation against Plaintiff, if any, was not motivated by Plaintiff having exercised rights under FMLA and was taken for legitimate, non-retaliatory, non-discriminatory reasons.

Fourteenth Affirmative Defense

This Defendant raises and preserves each and every other defense set forth in Rules 8, 9, and 12 of the Federal Rules of Civil Procedure that prove applicable, whether or not specifically set forth herein.

Fifteenth Affirmative Defense

This Defendant reserves his right to assert additional affirmative defenses to the extent that the same may be revealed to be applicable during discovery and/or the course of litigating this action.

Sixteenth Affirmative Defense

Without waiving the aforementioned defenses, or any other defenses, this Defendant states as follows in response to the correspondingly numbered paragraphs of Plaintiff's Complaint:

Parties

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

Jurisdiction and Venue

5. Paragraph 5 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 5 of the Complaint.

6. Paragraph 6 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or

knowledge sufficient to form a belief as to the truth of the allegations of paragraph 6 of the Complaint.

7. Paragraph 7 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 7 of the Complaint.

8. Paragraph 8 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 8 of the Complaint.

9. Paragraph 9 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 9 of the Complaint.

Factual Background

10. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 10 of the Complaint.

11. Denied.

12. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 12 of the Complaint.

13. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 13 of the Complaint.

14. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 14 of the Complaint.

15. It is admitted that the City of Bridgeport hired Ms. Fox as its City Engineer. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 15 of the Complaint.

16. It is admitted that Plaintiff Fox oversaw hiring of engineering and architectural consultants for project development, design, and field services and managed their contracts with the City of Bridgeport. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations that Ms. Fox was liaison between all private utility companies, developers, and state and federal regulatory agencies. The remaining allegations of paragraph 16 of the Complaint are denied.

17. Denied.

18. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 18 of the Complaint.

19. It is admitted that Ms. Fox applied for the position of City Manager. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegation as to when she applied. The remaining allegations of paragraph 19 of the Complaint are denied.

20. Paragraph 20 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 20 of the Complaint.

21. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 21 of the Complaint.

22. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 22 of the Complaint.

23. It is admitted that Ms. Fox was informed that she would not be considered for the City Manager position. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 23 of the Complaint.

24. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 24 of the Complaint.

25. Admitted.

26. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 26 of the Complaint.

27. Denied.

28. Admitted.

29. Denied.

30. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 30 of the Complaint.

31. Denied.

32. It is admitted that this Defendant became aware that Ms. Fox had or may have had a medical condition. The remaining allegations of paragraph 32 of the Complaint are denied.

33. It is admitted that Ms. Fox began utilizing her accrued vacation leave on or about December 23, 2024 and that at or about the same time she applied for and was granted leave under the Family and Medical Leave Act to start on or about January 3, 2025. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 33 of the Complaint.

34. Denied.

35. Denied.

36. Denied.

37. It is admitted that Jake Griffin was an engineering associate assigned to Ms. Fox's department and was transferred to the position of development services manager. It is denied that he was under direct supervision of Mr. Ford. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 37 of the Complaint.

38. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 38 of the Complaint.

39. It is admitted that on or about February 3, 2025, Ms. Fox notified the City of Bridgeport through her legal counsel that she was resigning effective February 17 due to alleged reasons asserted in paragraph 39. It is denied that Ms. Fox was subjected to disability discrimination while on FMLA leave. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 39 of the Complaint.

40. It is denied that Mr. Rogers contacted attorney William Ihlenfeld. The remaining allegations of paragraph 40 of the Complaint are admitted.

41. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 41 of the Complaint.

42. It is admitted that Mr. Ford knew of attorney Ihlenfeld in a professional capacity prior to becoming City Manager for the City of Bridgeport. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations about Defendant Rogers in paragraph 42. This Defendant denies the remaining allegations of paragraph 42 of the Complaint.

43. Denied.

44. Admitted.

45. This Defendant admits the allegations of paragraph 45 of the Complaint, with the exception that he is without information or knowledge sufficient to form a belief as to the truth of the allegations of the footnote 3 to that paragraph.

46. Denied.

47. Denied.

48. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 48 of the Complaint.

49. Denied.

50. Denied as to this Defendant. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 50 of the Complaint.

51. Denied.

52. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 52 of the Complaint.

53. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 53 of the Complaint.

54. Admitted.

55. Denied.

56. Admitted.

57. Denied.

58. Denied.

Patrick Ford's [alleged] History of Misconduct

59. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

60. Admitted.

61. Denied.

62. Denied.

63. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 63 of the Complaint.

64. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 64 of the Complaint.

65. Admitted.

66. Denied.

67. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 67 of the Complaint.

68. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 68 of the Complaint.

69. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 69 of the Complaint.

70. Denied.

71. Denied.

72. Denied.

73. It is admitted that Mr. Ford had a six-month probationary period in his employment contract with the City of Bridgeport. The remaining allegations of paragraph 73 of the Complaint are denied.

74. Denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. It is admitted that the investigation was impartial. The remaining allegations of paragraph 79 of the Complaint are denied.

80. Denied.

81. Denied.

82. Denied.

83. Denied.

84. Denied.

85. Denied.

**Leon Mark Roger's [alleged] History of Harassing
and Unlawful Conduct at the Workplace**

86. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

87. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 87 of the Complaint.

88. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 88 of the Complaint.

89. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 89 of the Complaint.

90. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 90 of the Complaint.

91. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 91 of the Complaint.

92. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 92 of the Complaint.

93. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 93 of the Complaint.

94. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 94 of the Complaint.

95. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 95 of the Complaint.

96. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 96 of the Complaint.

97. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 97 of the Complaint.

98. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 98 of the Complaint.

99. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 99 of the Complaint.

100. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 100 of the Complaint.

101. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 101 of the Complaint.

102. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 102 of the Complaint.

103. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 103 of the Complaint.

104. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 104 of the Complaint.

105. Admitted.

106. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 106 of the Complaint.

107. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 107 of the Complaint.

108. Denied.

109. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 109 of the Complaint.

110. Denied.

111. Denied.

Count I

Violation of the Family and Medical Leave Act (FMLA)

112. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

113. Paragraph 113 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 113 of the Complaint.

114. Paragraph 114 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 114 of the Complaint.

115. Admitted.

116. Denied.

117. Denied.

118. Denied.

119. Denied.

120. Denied.

121. Denied.

122. Denied.

Count II

Violation of the West Virginia Human Rights Act

123. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

124. Paragraph 124 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, it is admitted that Ms. Fox is a woman, and this Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations of paragraph 124 of the Complaint.

125. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 125 of the Complaint.

126. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 126 of the Complaint.

127. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 127 of the Complaint.

128. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 128 of the Complaint.

129. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 129 of the Complaint.

130. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 130 of the Complaint.

131. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 131 of the Complaint.

Count III

Constructive Discharge

132. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

133. Denied.

134. Denied.

135. Denied.

Count IV

Defamation

136. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

137. Denied.

138. Denied.

139. Denied.

140. Denied.

141. Denied.

142. Denied.

143. Denied.

Count V

Negligent and Intentional Infliction of Emotional Distress

144. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

145. Denied.

146. Denied.

147. Denied.

148. Denied.

149. Denied.

Count VI

Breach of Fiduciary Duty

150. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

151. Paragraph 151 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 151 of the Complaint.

152. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 152 of the Complaint.

153. Denied.

154. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 154 of the Complaint.

Count VII

**Violation of the Ethical Standards for Elected
and Appointed Officials
(W. Va. Code § 6B-2-5)**

155. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

156. Paragraph 156 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 156 of the Complaint.

157. Paragraph 157 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 157 of the Complaint.

158. Paragraph 158 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 158 of the Complaint.

159. Denied.

160. Denied.

161. Denied.

162. Denied.

Count VIII

Negligent Retention of Defendant Ford

163. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

164. Denied.

165. Paragraph 165 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 165 of the Complaint.

166. Denied.

167. Denied.

168. Denied.

Count IX

Negligent Retention of Defendant Rogers

169. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

170. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 170 of the Complaint.

171. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 171 of the Complaint.

172. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 172 of the Complaint.

173. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 173 of the Complaint.

174. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 174 of the Complaint.

Count X

Vicarious Liability

175. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

176. Denied.

177. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 177 of the Complaint.

178. Paragraph 178 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 178 of the Complaint.

179. Paragraph 179 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 179 of the Complaint.

Count XI

Strict Liability

180. This Defendant repeats and reasserts the responses set forth in the preceding paragraphs of this Answer as if fully set forth here.

181. Denied.

182. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 182 of the Complaint.

183. This Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 183 of the Complaint.

184. Paragraph 184 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 184 of the Complaint.

185. Paragraph 185 of the Complaint includes allegations of law to which no response is required. To the extent a response is deemed necessary, this Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations of paragraph 185 of the Complaint.

Prayer for Relief

186. In response to the “WHEREFORE” paragraph of the Complaint, including, without limitation, subparagraphs a. through f. thereof, it is denied that Plaintiff Fox is entitled to any judgment or recovery of any type against this Defendant.

WHEREFORE, Defendant Patrick B. Ford requests that this Court deny Plaintiff the relief sought against him in her Complaint or any other relief and further requests entry of judgment in his favor and an award to him of his costs and attorney fees incurred in defending this action.

TRIAL BY JURY IS DEMANDED ON ALL ISSUES SO TRIABLE.

PATRICK B. FORD,

By counsel,

/s/ Jeffrey S. Zurbuch

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as the Bridgeport City Manager,
LEON MARK ROGERS, JR., individually
and as the Bridgeport Interim City Manager,**

Defendants.

CERTIFICATE OF SERVICE

I, Jeffrey S. Zurbuch, counsel for Patrick B. Ford, do hereby certify that on August 6, 2025, I electronically filed the foregoing *Answer of Patrick B. Ford* with the Clerk of the Court using the CM/ECF system, which will send notification to the following counsel as a CM/ECF participant:

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