UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LIBERTARIAN NATIONAL COMMITTEE, INC., Plaintiff, v. **ANGELA ELISE MCARDLE &** **AUSTIN BRATTON PADGETT** Defendants.	Case Number: cv-26-3150

DEFENDANTS' ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT

1. The allegations in this paragraph constitute conclusion of law to which no response is required.
2. The allegations in this paragraph constitute conclusion of law to which no response is required.
3. The allegations in this paragraph constitute conclusion of law to which no response is required.

4. Defendants admit that they are residents of Travis County and Citizens of Texas. The rest of the allegations in this paragraph constitute conclusion of law to which no response is required.
5. The allegations in this paragraph constitute conclusion of law to which no response is required. To the extent a response is required, Defendants deny.
6. Defendants admit.
7. Defendants admit.
8. Defendants admit.
9. Defendants admit.
10. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.
11. Defendant McArdle admits. Defendant Padgett is without sufficient information to admit or deny.
12. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.
13. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts,

and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

14. Defendants lack sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and therefore deny them.

15. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

16. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

17. Defendants deny.

18. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

19. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

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28. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph, and therefore denies them.

29. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph, and therefore denies them.

30. The allegations in this paragraph violate Federal Rule of Civil Procedure 8 because it consists of legal conclusions, generalizations, multi-fact asserts, and/or argument rather than a short and plain statement of fact, and thus no response is required. To the extent a response is required Defendants deny.

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45. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph, and therefore denies them.

46. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph, and therefore denies them.

47. Defendants admit.

48. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph, and therefore denies them.

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AFFIRMATIVE DEFENSES OF DEFENDANTS MCARDLE AND PADGETT

FIRST DEFENSE

Plaintiff failed, in whole or in part, to state claims upon which relief could be granted against Defendants.

SECOND DEFENSE

Plaintiff's claims against Defendants are barred, in whole or in part, by the applicable statute of limitations.

THIRD DEFENSE

Plaintiff's claims against Defendants are barred, in whole or in part, by the doctrines of laches, unclean hands, acquiescence, and equitable estoppel.

FOURTH DEFENSE

Plaintiff's claims are barred against Defendants, in whole or in part, because Plaintiffs proximately caused their own damages.

FIFTH DEFENSE

Plaintiff's claims are barred against Defendants, in whole or in part, because Defendants are not the actual or proximate cause of Plaintiff's damages, if any.

SIXTH DEFENSE

Plaintiff's claims are barred against Defendants, in whole or in part, because Plaintiff has no valid legal claim to recover the damages they seek.

SEVENTH DEFENSE

Plaintiff's claims are barred against Defendants, in whole or in part, because Plaintiff's lack standing to sue for the damages they seek.

EIGHTH DEFENSE

Plaintiff's claims are barred against Defendants, in whole or in part, because there is no justiciable controversy.

NINTH DEFENSE

Plaintiff's claims fail because Plaintiff ratified or was otherwise aware of the alleged acts of the Defendants.

TENTH DEFENSE

Plaintiff has no claim to recover damages from Defendants, in whole or in part, because Plaintiff failed to mitigate its alleged damages.

ELEVENTH DEFENSE

Plaintiff's tort-based claims are barred, in whole or in part, due to the economic-loss doctrine or similar applicable doctrines.

TWELVETH DEFENSE

Plaintiff's claims are barred, in whole or in part, due to the business judgment rule or similar applicable doctrines.

THIRTEENTH DEFENSE

Plaintiff's claims fail against Defendants, in whole or in part, because Defendants are not personally liable for the alleged acts of legal entities such as Limited Liability Corporations.

FOURTEENTH DEFENSE

Plaintiff's claims fail, in whole or in part, because of the voluntary payment rule.

FIFTEENTH DEFENSE

Plaintiff's claims fail, in whole or in part, because of applicable statutory safe harbors, including but not limited to D.C. Code § 29-406.70.

SIXTEENTH DEFENSE

Defendants are not liable to Plaintiffs, in whole or in part, because the alleged misconduct described in the Complaint is the result of a good faith accident or mistake.

SEVENTEENTH DEFENSE

Defendants are entitled to indemnification from Plaintiff.

EIGHTEENTH DEFENSE

Defendants acted at all times in good faith and in accordance with their legal duties.

Respectfully submitted this 11th day of November, 2026.

THE BERNHOFT LAW FIRM, S.C.

Attorney for Defendants
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Certificate of Service

I hereby certify that I have served or will serve the forgoing documents via email as follows:

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Dated November 11, 2026.

/s/ Patrick Kane, Esq.
Patrick Kane, Esq.
The Bernhoft Law Firm, S.C.