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Shane D. Crowson dba Alaska
Heavy Haul Transport

J.H. BACHMANN GmbH and UTC)
BACHMANN, INC.,)

Plaintiffs,)

v.)

BRAGG INVESTMENT COMPANY, INC.)
successor-in-interest by merger)
to HEAVY TRANSPORT, INC.,)
NORTHSTAR TRUCKING, INC., NORTH)
STAR TERMINAL AND STEVEDORE)
COMPANY, LLC, NORTH STAR TERMINAL)
AND STEVEDORE COMPANY LLC OF)
DELAWARE AND SHANE D. CROWSON dba)
ALASKA HEAVY HAUL TRANSPORT,)

)No. 3:06:CV 00145(TMB)
)No. 3:06:CV-00274(TMB)
) Consolidated

Defendants.)

ANSWER TO CROSS CLAIM OF
NORTH STAR TERMINAL & STEVEDORE COMPANY, LLC

Defendant Shane D. Crowson answers the Cross Claim of North
Star Terminal & Stevedore, LLC as follows:

1. Defendant admits paragraph 1.
2. Defendant admits paragraph 2.

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3. Defendant admits paragraph 3.

4. Defendant admits paragraph 4.

5. Defendant admits paragraph 5.

6. Defendant admits paragraph 6.

7. Defendant admits paragraph 7.

8. Defendant admits paragraph 8.

9. Defendant denies that Shane D. Crowson was satisfied with the position of the transformers on the trucks, and lacks information sufficient to know whether Curt Nielsen was satisfied. Defendant admits the balance of the allegations.

10. Defendant admits that while traveling 2-3 miles per hour, one of the trucks entered 94th Avenue from Old Seward Highway and the trailer tipped severely to the right, the tie down chains broke, and the transformer fell off the right side of the truck. Defendant denies the balance of the allegations.

11. Paragraph 11 asserts a legal conclusion, and thus requires no answer.

12. Defendant denies paragraph 12, for lack of information sufficient to form a belief.

13. Defendant denies that legally actionable conduct of Shane D. Crowson caused damage to the transformer. Defendant admits the balance of the allegations.

14. Paragraph 14 asserts a legal conclusion, and thus requires no

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answer. To the extent an answer is required, Defendant denies paragraph 14.

15. Paragraph 15 asserts a legal conclusion, and thus requires no answer. To the extent an answer is required, Defendant denies that legally actionable conduct of Shane D. Crowson caused damage to the transformer.

FIRST AFFIRMATIVE DEFENSE

In the event Shane D. Crowson is held liable herein, all parties, including North Star Terminal & Stevedore, LLC, and parties not presently named herein, are liable in contribution to Shane D. Crowson.

WHEREFORE, Defendant Shane D. Crowson requests judgment as follows:

1. That North Star Terminal & Stevedore, LLC's Cross Claim be dismissed with prejudice;
2. That Shane D. Crowson be awarded his costs and attorneys' fees with respect thereto;
3. That all the parties be held liable to Shane D. Crowson in contribution, including North Star Terminal & Stevedore, LLC, and parties not presently named herein.
4. For such further relief as may be just.

Dated at Anchorage, Alaska this 30th day of April, 2007.

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This is to certify that the foregoing Answer to Cross-Claim of North Star Terminal is being served by electronically to:

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