

g. the Amended Complaint and each purported Claim for Relief fails to state a claim against Mohebbi upon which relief can be granted;

h. Plaintiff's allegations are not pled with sufficient particularity under the Federal Rules of Civil Procedure;

i. the claims alleged in the Amended Complaint are barred, in whole or in part, by the applicable statute of limitations;

j. Mohebbi made no material misrepresentation or omission of material fact;

k. Mohebbi did not act with scienter in connection with any violation of the securities laws;

l. Mohebbi did not act with recklessness or extreme recklessness in connection with any violation of the securities laws;

m. Mohebbi did not act with negligence in connection with any violation of the Securities Act of 1933 Sections 17(a)(2) and (3) (15 U.S.C. §§ 77q(a)(2) and (3));

n. Mohebbi did not know of any violation of the securities laws by Qwest;

o. Mohebbi did not provide substantial assistance in any violation of the securities laws by Qwest, if any existed;

p. Mohebbi did not knowingly circumvent or knowingly fail to implement a system of internal accounting controls at Qwest;

q. Mohebbi did not knowingly falsify any book, record, or account of Qwest described in the Securities Exchange Act of 1934 Section 13(b)(2);

r. Mohebbi did not make or cause to be made any materially false or misleading statement or omission of material fact to any accountant in connection with an

audit, review, or examination of Qwest's financial statements or the preparation or filing of any document or report required to be filed by the SEC;

s. Mohebbi did not know of any inaccurate or misleading filing with the SEC by Qwest and did not lend substantial assistance to Qwest in filing any inaccurate or misleading filing, if any was filed;

t. Mohebbi did not know of any primary violation by Qwest of Exchange Act Section 13(b)(2), and he did not provide substantial assistance to Qwest in that violation, if any existed;

u. the "group-published documents exception" to Federal Rule of Civil Procedure 9(b) does not make Mohebbi liable for false or misleading statements or omissions of material fact in Qwest's public filings;

v. the SEC conducted an unlawful and improper investigation; and

w. Mohebbi received no "ill-gotten gains," as alleged in the Amended Complaint and, thus, cannot be made to disgorge them.

2. Every act or omission alleged in the Amended Complaint against Mohebbi was done or omitted in good faith conformity with the rules and regulations of the Securities and Exchange Commission and, therefore, pursuant to Section 23(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78(w)), there is no liability for any act or omission so alleged.

3. Mohebbi had no knowledge of or reasonable ground to believe in the existence of the facts on which his liability is alleged to exist.

4. Mohebbi's defense to the allegations in paragraph 105(e) regarding the C&W E-mail are fully set forth above in Part I.A., and Mohebbi hereby incorporates that defense here.

5. Mohebbi did not backdate any document.

6. Mohebbi cannot be liable for any act or omission alleged in the Amended Complaint and not attributed to him.

7. Every defense listed herein applies to each of Plaintiff's claims.

8. Mohebbi reserves the right to amend his Answer to add any additional defenses as facts become known through discovery.

IV. JURY DEMAND

A trial by jury is demanded on all issues and claims alleged herein which are so triable by right.

PRAYER FOR RELIEF

WHEREFORE, Mohebbi requests this Court to enter judgment in his favor and against Plaintiff, that Plaintiff take nothing by its Amended Complaint, and that the Amended Complaint be dismissed with prejudice, and that Mohebbi be awarded attorneys' fees and costs.

Dated: April 26, 2006

By: *s/ Paul R. Grand*

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April, 2006, I caused a true and correct copy of Afshin Mohebbi's Answer to the Amended Complaint and Demand for Jury Trial to be filed electronically using the CM/ECF system, which will send notification of such filing to the following:

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