

**IN THE HIGH COURT OF NEW ZEALAND
NEW PLYMOUTH REGISTRY**

**I TE KOTI MATUA O AOTEAROA
NGAMOTU ROHE**

CIV: 2021-443-11

UNDER: the Companies Act 1993

IN THE MATTER OF: the liquidation of Clarence William Withers (Professional Swindler) Sting Operation Limited (formerly 2004 Holdings Limited)

BETWEEN: CLARENCE WILLIAM WITHERS
Plaintiff, Counterclaim Defendant

AND: CLARENCE WILLIAM WITHERS (PROFESSIONAL SWINDLER) STING OPERATION LIMITED (formerly 2004 Holdings Limited)
Defendant, Counterclaim Plaintiff

STATEMENT OF DEFENCE

Dated: 30 March 2021

PRESENTED BY:

Dennis A. Smith, 2a Para Street, Matapuna, Taumarunui 3920
dennis@dennis.nz

To the Registrar of the High Court at New Plymouth

And

To the Plaintiff

The Defendant says of the Statement of Claim that:

1. It **accepts** Clause 1.
2. It **denies** Clause 2, stating that the Defendant ceased trading prior to its removal from the company register on 28 October 2020.
3. It **accepts** Clause 3.
4. It **denies** Clause 4.
5. It **accepts** Clause 5.
6. It **accepts** Clause 6.
7. It **denies** Clause 7.
8. It **denies** Clause 8, stating that the Defendant ceased trading with a NIL balance sheet prior to its removal from the company register on 28 October 2020.
9. It **denies** Clause 9.

Date: 30 March 2021

A handwritten signature in black ink, appearing to read "Dennis A. Smith". The signature is written in a cursive style with a horizontal line underneath.

Dennis A. Smith, Director
Plaintiff