UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
LONDON DIVISION
CASE NO. 6:26-CV-00104-GFVT

CAMERON ROWE, on Behalf of Himself and All Others Similarly Situated — PLAINTIFFS

v.

ANSWER TO COMPLAINT

TACKETT MINING, INC. et. al — DEFENDANTS

* * * * * * * * * * *

Comes John E. Norman, Fayette County Public Administrator ("Public Administrator"), and as the Administrator of the Estate of Jerry Tackett ("Tackett Estate"), states as follows as his Answer to the Complaint of Plaintiffs, Cameron Rowe, on Behalf of Himself and All Others Similarly Situated.

1. The Public Administrator denies that which is set forth in Paragraphs 1, 2, and 3, 110, and 112 as each contain allegations and general outlooks relative to the theory of wage theft that require no answers;
2. The Public Administrator is the Administrator of the Estate of Jerry Tackett, and to his best knowledge, information, and belief after reasonable inquiry and due diligence is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraphs 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 30, 31, 32, 33, 34, 35, 36, 37, 40, 42, 43, 44, 45, 46 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 111, 113, 114, 116, 117, 118, 119,

120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, and 143, or that same contain legal conclusions to which no response is required;

3. The Public Administrator admits that which is set forth in Paragraph 39 to the extent that the undersigned was appointed as Public Administrator on October 29, 2025, however the Public Administrator advises this Court and all parties that since said appointment he has joined the law firm of Kinkead & Stilz and - although he has been properly served at the address referenced in the Complaint – the Public Administrator now has an address of 301 East Main Street, Suite 900, Lexington, Kentucky 40507;
4. After reasonable inquiry and due diligence since his appointment as personal representative of the Estate of Jerry Tackett, the Public Administrator submits that the subject estate is insolvent and that, to the best of the Public Administrator's knowledge, information, and belief, no assets have been identified from which a judgment could be satisfied. Should the Public Administrator's ongoing investigation result in the discovery of assets that alter this assessment, the filed Inventory in the underlying probate matter - *In Re: Estate of Jerry Tackett,* Fayette County District Court Case No. 25-P-01476 - will be amended and the Court and all interested parties herein will be promptly notified; and
5. That all allegations not specifically admitted herein are denied.

/s/ John E. Norman

John E. Norman, Public Administrator
Estate of Jerry Tackett
117 West Second Street
Lexington, KY 40507
(859) 252-8255
john@normanlawpllc.com

CERTIFICATE OF SERVICE

I certify that true and correct copies of the foregoing have been served via CM/ECF on this the 1st day of April, 2026.

/s/ John E. Norman
John E. Norman, Public Administrator