

13-302C. Statement of denial and affirmative defense(s).

The defendant(s) deny(ies) what the plaintiff(s)] say(s) about
_____ (theory of recovery(ies) by name)] [and defendant(s)
say(s) that: _____

(Violation of the ordinance was excused or justified, [and]
The plaintiff(s) [was] [were] negligent, [and]
Another party was negligent, [and]
A non-party was negligent, [and]
Etc.).

USE NOTE

Here, the affirmative defenses applicable to a given theory are established by name. See the Use Note under UJI 13-302A NMRA.
[As amended, effective January 1, 1987; March 1, 2005.]