By: Krystal Franklin Filed: 10/16/2017 4:32 PM

#### CAUSE NO: 2017-36224

3S REAL ESTATE INVESTMENTS,	§	IN THE DISTRICT COURT OF
LLC,	§	
Plaintiff	§	
	§	
v	§	HARRIS COUNTY, TEXAS
	§	
THIRD COAST DEVELOPMENT,	§	
LLC,	§	
Defendant	§.	281st JUDICIAL DISTRICT

# DEFENDANT'S ORIGINAL ANSWER AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW DEFENDANT Third Coast Development, LLC, in the aboveentitled and numbered cause, and files this Original Answer in response to Plaintiff's Original Petition and Request for Disclosure, and would respectfully show unto the Court the following:

#### **GENERAL DENIAL**

1. Defendant generally denies each and every, all and singular, the allegations contained in Plaintiff's Original Petition, and demands that each allegation be strictly proven by a preponderance of the evidence.

#### **REQUEST FOR DISCLOSURE**

2. Pursuant to Rule 194, Plaintiff is required to disclose, within thirty (30) days of receipt of this request, the information, or material described in Rule 194.2(a) through (i).

### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant Third Coast Development, LLC respectfully prays that all relief prayed for by Plaintiff be denied and that Plaintiff take nothing herein and for sure other and further relief as Defendant may be justly entitled to receive.

Respectfully Submitted,

/s/ Matthew F. Davis

Matthew F. Davis State Bar No. 24092325 WRIGHT & CLOSE, LLP One Riverway, Suite 2200 Houston, Texas 77056 713-572-4321 713-572-4320 (fax) davis@wrightclose.com

Counsel for Defendant

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was duly served on all counsel of record, on October 16, 2017.

Barry M. Hammond, Jr. 1302 Waugh Drive #539 Houston, Texas 77019 Attorney for Plaintiff

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/s/ Matthew F. Davis
Matthew F. Davis