CAUSE NO. 2018-08341

| FREE AND SOVEREIGN STATE | § | |
|-----------------------------|---|-------------------------|
| OF VERACUZ DE IGNACIO DE LA | § | IN THE DISTRICT COURT |
| LLAVE, | § | |
| , | § | |
| Plaintiff, | § | |
| | § | 4 |
| v. | § | |
| | § | OF HARRIS COUNTY, TEXAS |
| CW OPERATING CO., INC., | § | |
| JAVIER DUARTE DE OCHOA, | § | |
| JOSE A. BANDIN, MONICA | § | |
| BABAYAN, BBVA COMPASS | § | |
| BANCSHARES, INC., & WELLS | § | 113TH JUDICLAL DISTRICT |
| FARGO BANK, N.A. | § | |
| | § | |
| Defendants. | § | |

DEFENDANT WELLS FARGO BANKAN'A.'S ORIGINAL ANSWER

Defendant Wells Fargo Bank, N.A. ("<u>Defendant</u>") files this Original Answer to Plaintiff the Free and Sovereign State of Veracruz de Ignacio de la Llave's ("<u>Plaintiff</u>") Original Petition and Application for Temporary Restraining Order.

Specifically, Defendant asserts a general denial pursuant to Rule 92 of the Texas Rules of Civil Procedure and requests that Plaintiff be required to prove Plaintiff's claims and causes of action by a preponderance of the evidence or such higher standard as may be applicable. This Answer is being filed subject to, and without waiving, any right by Defendant to remove this matter to federal court.

Dated: March 9, 2018 Respectfully submitted,

McGuireWoods LLP

By: <u>/s/ Charles B. Hampton</u>

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Attorneys for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served on the following counsel of record on March 9, 2018 by electronic service and that the electronic transmission was reported as complete.

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/s/ Charles B. Hampton

Charles B. Hampton