

CAUSE NO. 2018-06480

FREE AND SOVERIEGN STATE OF
VERACRUZ DE IGNACIO DE LA
LLAVE

Plaintiff,

v.

83 WEST JAGGED RIDGE, LLC, *ET AL.*

Defendants.

§
§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

295th JUDICIAL DISTRICT

THE BANDIN DEFENDANTS' ORIGINAL ANSWER

Defendants Jose Bandin, Monica Babayan, Banba Offices, LLC, 83 West Jagged Ridge, LLC, 87 West Jagged Ridge, LLC, 175 W New Harmony, LLC, 18 Griffin Hill, LLC, 138 Bryce Branch, LLC, and 43 Spinning Wheel, LLC (the "Bandin Defendants") hereby file this Original Answer to Plaintiff's Original Petition. In support thereof, the Bandin Defendants respectfully show as follows:

GENERAL DENIAL

1. The Bandin Defendants assert a general denial as authorized by Rule 92 of the Texas Rules of Civil Procedure, hereby denying each and every, all and singular, of the material allegations in Plaintiff's Original Petition, and demand that Plaintiff be required to prove its charges and allegations against the Bandin Defendants as required by the Constitution and laws of the State of Texas.

PRAYER FOR RELIEF

The Bandin Defendants pray that Plaintiff take nothing on its claims; that they recover their costs of court; and that they be granted such other and further relief, at law or in equity, to which they may show themselves justly entitled.

Respectfully submitted,

**FOGLER, BRAR, FORD,
O'NEIL & GRAY, LLP**

/s/ Murray Fogler _____

Murray Fogler

State Bar No. 07207300

mfogler@fbfog.com

Jas Brar

State Bar No. 24059483

jbrar@fbfog.com

909 Fannin Street, Suite 1640

2 Houston Center

Houston, Texas 77010

Tel: 713.481-1010

Fax: 713.574-3224

COUNSEL FOR THE BANDIN DEFENDANTS

Unofficial Copy Office of Chris Darrin District Clerk

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2018, a true and correct copy of the forgoing document has been served on all counsel of record, listed below, by the Electronic Service Provider, if registered, otherwise by email and/or fax.

/s/ Murray Fogler

MURRAY FOGLER

Anthony G. Buzbee (tbuzbee@txattorneys.com)
Christopher J. Leavitt (cleavitt@txattorneys.com)
The Buzbee Law Firm
JP Morgan Chase Tower
600 Travis, Suite 6850
Houston, Texas 77002

Unofficial Copy Office of Chris Daniel District Clerk