

CAUSE NO. 2018-06745

FREE AND SOVERIEGN STATE OF  
VERACRUZ DE IGNACIO DE LA  
LLAVE

Plaintiff,

v.

18 SHALLOWFORD PL., LLC, *ET AL.*

Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

334<sup>th</sup> JUDICIAL DISTRICT

**THE BANDIN DEFENDANTS' ORIGINAL ANSWER**

Defendants Jose Bandin, Monica Babayan, and 18 Shallowford Pl., 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

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**COUNSEL FOR THE BANDIN DEFENDANTS**

Unofficial Copy Office of Chris Daniel 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**

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