

CAUSE NO. 2023-00328

JPN HOLDINGS, LLC., as Trustee of the	§	IN THE DISTRICT COURT OF
304 JEANETTA LAND TRUST	§	
<i>Plaintiff</i>	§	
	§	
	§	HARRIS COUNTY, TEXAS
VS.	§	
	§	
CHAMBORD OWNERS ASSOCIATION,	§	
INC. And HIGH SIERRA MANAGEMENT	§	164 <sup>TH</sup> JUDICIAL DISTRICT
INC. <i>Defendants,</i>	§	

**DEFENDANT CHAMBORD OWNERS ASSOCIATION, INC**  
**ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Chambord Owners Association, Inc., Defendant in the above styled and numbered cause of action, and in response to the complaint filed against him, would respectfully show unto this Honorable Court and Jury as follows:

**I. GENERAL DENIAL**

1. Pursuant to Rule 92 of the TEXAS RULES OF CIVIL PROCEDURE, Defendant Chambord Owners Association, Inc. generally denies each and every, all and singular, the allegations contained within Plaintiff's First Amended Petition, and demands strict proof thereon by a preponderance of the credible evidence in accordance with the Constitution and laws of the State of Texas.

**II. ADDITIONAL DEFENSIVE MATTERS**

2. Plaintiff's claims are barred, in whole or in part, because the injuries, damages, and losses alleged in Plaintiff's pleadings, none being admitted, were proximately caused in whole or in part by the fault or negligence of Plaintiff or others including responsible third parties. Accordingly, Plaintiff's claims are barred or must be reduced under the doctrine of contributory or comparative fault and/or negligence and proportionate responsibility.

3. Defendant hereby gives notice that it intends to rely upon such other defenses as may become available or apparent during the course of discovery and thus reserves its right to amend this answer.

### III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Chambord Owners Association, Inc. prays that upon final trial and hearing hereof, Plaintiff recovers nothing from Defendant Chambord Owners Association, Inc. and that Defendant Chambord Owners Association, Inc. recover costs of court and other such further relief, both general and special, to which Defendant Chambord Owners Association, Inc. may be justly entitled.

Respectfully submitted,

**BARTLEY & SPEARS, P.C.**

By: \_\_\_\_\_

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ATTORNEYS FOR DEFENDANT  
Chambord Owners Association, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing has been forwarded to all opposing counsel or parties, if Pro Se, on this 31st day of January , 2023, addressed as follows:

VIA E-Service: [efile@thenicholslawfirm.com](mailto:efile@thenicholslawfirm.com)



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Jeffrey B. Hardaway

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Naomi Gutierrez on behalf of Jeffrey Ben Hardaway  
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Status as of 1/31/2023 4:21 PM CST

#### Case Contacts

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