

CAUSE NO. 2022-59398

QUEST TRUST COMPANY,

Plaintiff,

v.

**SANDY DASIGENIS, TRUSTEE,
JONATHAN CAMPBELL AND MAIRA
GIRALDO, ET AL**

Defendants.

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IN THE DISTRICT COURT

152ND JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

DEFENDANT, DUTCH MILL MHP, LLC'S ORIGINAL ANSWER

TO THE HONORABLE COURT:

Defendant, DUTCH MILL MHP, LLC (“Defendant”) hereby files its Original Answer to Plaintiff’s First Amended Original Petition, and would respectfully show the Court as follows:

I. GENERAL DENIAL

Pursuant to Tex. R. Civ. P. 92, Defendant enters a general denial, denying generally each and every, all and singular, of the allegations contained in Plaintiff’s First Amended Original Petition (and all amendments and supplements thereto), and demanding strict proof thereof.

II. TEX. R. CIV. P. 193.7 NOTICE

This paragraph serves as notice, pursuant to Tex. R. Civ. P. 193.7, that documents produced in response to written discovery requests served by Defendant will be used against the producing party in any pretrial proceeding and/or trial.

WHEREFORE, PREMISES CONSIDERED, Defendant DUTCH MILL MHP, LLC prays that Plaintiff take nothing on its claims, that Defendant recover its attorneys' fees and costs, and for such other and further relief, at law and in equity, to which Defendant may show itself justly entitled.

Respectfully submitted,

INVICTA LAW FIRM

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SANDY DASIGENIS, TRUSTEE, JONATHAN
CAMPBELL, MAIRA GIRALDO, AND DUTCH MILL
MHP, LLC

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on each attorney of record or party in accordance with Rules 21 and 21a of the Texas Rules of Civil Procedure on February 1, 2023.

/s/ Alicia M. Matsushima
Alicia M. Matsushima

Automated Certificate of eService

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