

CAUSE NO. 2023-18325

ELIAS HERNANDEZ, ET AL
Plaintiffs,

v.

R&R PROPERTIES
Defendants.

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IN THE DISTRICT COURT

HARRIS COUNTY TEXAS

333rd JUDICIAL COURT

DEFENDANT'S ORIGINAL ANSWER

R&R Properties, Defendant, files its Original Answer and states:

1. Defendant denies generally each and every allegation set forth in Plaintiff's Original Petition and demands strict proof thereof by a preponderance of the evidence.

2. Defendant is not guilty.

3. Defendant raises the affirmative defenses of res judicata, the statute of limitations, the statute of frauds, laches, estoppel, waiver, release, bona fide purchaser and fraudulent transfer.

WHEREFORE, Defendant R&R Properties, requests that the Court dismiss Plaintiffs' claims, that Plaintiffs take nothing by this action and that Defendant recover its attorney's fees, costs of court, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

JERRY L. SCHUTZA

By: /s/ Jerry L. Schutza

Jerry L. Schutza

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**ATTORNEY FOR DEFENDANT R&R
PROPERTIES**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was sent to opposing counsel and all parties of interest via electronic service on April 3, 2023.

VIA ELECTRONIC SERVICE

Herrick L. Sovany
3700 Buffalo Speedway, Suite 650
Houston, Texas 77098

/s/ Jerry L. Schutza
Jerry L. Schutza

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JERRY SCHUTZA on behalf of JERRY SCHUTZA
Bar No. 17853800
schutzalaw@yahoo.com
Envelope ID: 74286688
Filing Code Description: Answer/ Response / Waiver
Filing Description: Defendant's Original Answer
Status as of 4/3/2023 4:57 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jerry Schutza		schutzalaw@yahoo.com	4/3/2023 4:37:58 PM	SENT