

CAUSE NO. 2022-05493

CHARLES R. MARTIN &
ASSOCIATES, LTD.,
Plaintiff,

v.

ACERO BELLA, INC., ACE SCAPES,
INC., ALKUSARI STONE OF
HOUSTON, INC., ET AL.
Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

190TH JUDICIAL DISTRICT

**DEFENDANT, DORO UNIQUE FLOORING, INC.'S ORIGINAL ANSWER AND
JURY DEMAND**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Doro Unique Flooring, Inc., "Defendant" in above entitled and numbered cause, and file this Original Answer, and in support thereof would respectfully show this Honorable Court the following:

I. GENERAL DENIAL

1. Defendant denies generally and specially each and all of the allegations contained in Plaintiff's Original Petition on file herein and demands strict proof thereof.

II. AFFIRMATIVE DEFENSES

2. Defendant would further allege that Plaintiff's damages, if any, were the result of Plaintiff's own acts of negligence in that Plaintiff failed to act as a reasonable and prudent person in the same or similar circumstances.

WHEREFORE, PREMISES CONSIDERED, Defendant pray that Plaintiff's cause be in all things denied and that Plaintiff go hence without costs; Defendant prays for general relief and for such other and further relief, in equity and in law, to which Defendant may show themselves to be justly entitled.

III. JURY DEMAND

Defendant hereby demand a trial by jury and tender the appropriate fee.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ David A. Oubre

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**ATTORNEY FOR DEFENDANT, DORO'S
UNIQUE FLOORING, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following counsel of record by electronic filing, e-mail, facsimile transmission, or certified mail on this the 23rd day of March, 2022.

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/s/ David A. Oubre

DAVID A. OUBRE

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Kathy Truong on behalf of David Oubre
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Status as of 3/24/2022 7:54 AM CST

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