

CAUSE NO. 2023-26587

LAW OFFICE OF	§	IN THE DISTRICT COURT
ANTHONY S. MUHARIB, P.L.L.C.	§	
Plaintiff,	§	
	§	
VS.	§	OF HARRIS COUNTY, TEXAS
	§	
ZEUS LENDING.COM, INC.;	§	
NEW YORK MUTUAL, LLC	§	
PETER FARRELL AND	§	
TAMA LINDQUIST	§	
Defendants.	§	189 <sup>th</sup> JUDICIAL DISTRICT

**ORIGINAL ANSWER OF DEFENDANTS ZEUS LENDING.COM, INC.  
AND NEW YORK MUTUAL, LLC**

COME NOW, Defendants ZEUS LENDING.COM, INC. AND NEW YORK MUTUAL, LLC (“Zeus Defendants”) and file this, their Original Answer to Plaintiff LAW OFFICE OF ANTHONY S. MUHARIB P.L.L.C.’s (“Plaintiff”) Original Petition. In support thereof, the Zeus Defendants would respectfully show as follows:

**I. GENERAL DENIAL**

1. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, the Zeuse Defendants generally deny each and every one, all and singular, of the allegations contained in Plaintiff’s Original Petition. The Zeus Defendants demand Plaintiff be required to strictly prove each and every element of each and every claim. The Zeus Defendants specifically reserve the right to plead further, both in avoidance and in seeking affirmative relief. The Zeus Defendants pray for general relief. The Zeus Defendants expressly reserve all of their rights, claims, and defenses under the applicable contracts at issue and applicable law.

## **II. PRAYER**

The Zeus Defendants request that upon trial or hearing, the Court (i) enter a take-nothing judgment on the claims asserted against the Zeus Defendants by Plaintiff, (ii) tax all costs against Plaintiff, and (iii) grant The Zeus Defendants such additional and further relief to which they may show themselves justly entitled.

Respectfully submitted,

ANDREWS MYERS, P.C.

By: /s/ C. Elaine Howard  
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**ATTORNEYS FOR DEFENDANTS  
ZEUS LENDING.COM, INC. AND  
NEW YORK MUTUAL, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of May 2023, a true and correct copy of the foregoing was forwarded to the following counsel of record in accordance with the Texas Rules of Civil Procedure:

**Via E-Service**

Ray L. Shackelford  
Shackelford & Associates, LLC  
1406 Southmore Blvd.  
Houston, Texas 77004  
[RSHACKCTIC@YAHOO.COM](mailto:RSHACKCTIC@YAHOO.COM)

**ATTORNEY FOR PLAINTIFF**

*/s/ C. Elaine Howard*

C. ELAINE HOWARD

### 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.

Jennifer Pipes on behalf of C. Elaine Howard  
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Filing Code Description: Answer/ Response / Waiver  
Filing Description: Answer/ Response / Waiver  
Status as of 5/19/2023 1:10 PM CST

#### Case Contacts

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