

CAUSE No. 2023-27150

ROBERT TURNER JOHNSTON
PLAINTIFF

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

VS.

HARRIS COUNTY, TEXAS

AHMAD CHARIF
DEFENDANT

165TH JUDICIAL DISTRICT

DEFENDANT’S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Ahmad Charif (“Charif”), Defendant in the above styled and numbered cause, and files this Original Answer to Plaintiff’s Original Petition in the above styled and numbered cause, and would show the Court as follows:

I.

GENERAL DENIAL

1. Defendant denies each and every, all and singular, the allegations contained in Plaintiff’s Original Petition, and demands strict proof thereof, as he is permitted to do by the Texas Rules of Civil Procedure.

II.

SPECIFIC DENIALS, DEFENSES, AFFIRMATIVE DEFENSES AND RELATED MATTERS

2. Defendant further denies and answers, without waiving any denial, defense, affirmative defense, plea or claim, if necessary:

- a. Defendant denies that all alleged conditions precedent have been performed or satisfied. Defendant requires proof of the satisfaction of all conditions precedent; and
- b. Defendant asserts that the claims alleged against him are barred, in whole or in part, by the doctrines of limitations and waiver; and

- c. Defendant specifically denies making any false and/or misleading statements to Plaintiff.

WHEREFORE, PREMISES CONSIDERED, Defendant requests judgment of the Court that Plaintiff take nothing by his suit, and that Defendant go hence with his costs without day; and for such other and further relief, at law or in equity, as to which he may show himself justly entitled.

Respectfully submitted,

DE LANGE & HUDSPETH, L.L.P.

By: /s/ Marc J. Magids

MARC J. MAGIDS
State Bar No.: 12818500
email: mmagids@dhmtlaw.com
1177 West Loop South, Suite 1300
Houston, TX 77027
Phone: 713-871-2000
Fax: 713-871-2020

ATTORNEYS FOR DEFENDANT, AHMAD CHARIF

Certificate of Service

I hereby certify that on this 1st day of June, 2023 a true and correct copy of Defendant's Original Answer has been forwarded by certified mail return receipt requested and regular U.S. Mail to the following:

R. Turner Johnston
5300 Memorial Drive, Ste. 270
Houston, TX 77007

/s/ Marc J. Magids
Marc J. Magids

VERIFICATION


STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, personally appeared AHMAD CHARIF, who, after being made known to me and sworn on his oath stated that he has read the foregoing Answer; and that the statements made therein are true and correct based upon his personal knowledge. Specifically, AHMAD CHARIF denies making any false or misleading statements to Plaintiff and that all or part of Plaintiff's claims are barred by limitations and/or waiver.

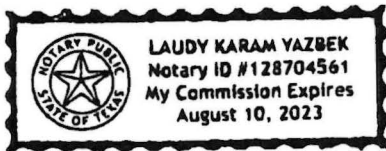


Ahmad Charif

SWORN TO and SUBSCRIBED BEFORE ME, on this 25th day of MAY, 2023.



Notary Public in and for the State of Texas



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.

Sharon Halstead on behalf of Marc Magids
Bar No. 12818500
shalstead@dhmtlaw.com
Envelope ID: 76196760
Filing Code Description: Answer/ Response / Waiver
Filing Description: Answer/ Response / Waiver
Status as of 6/1/2023 3:30 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
e service		eservice@sorrels.com	6/1/2023 1:42:02 PM	SENT
Sharon AHalstead		shalstead@dhmtlaw.com	6/1/2023 1:42:02 PM	SENT
Marc J.Magids		mmagids@dhmtlaw.com	6/1/2023 1:42:02 PM	SENT