

Cause Number 2923-54391

Rene Guerron In the (check one):
Plaintiff 11 District Court
Court Number County Court at Law
v. Justice Court (JP)
Karla Jimenez Harris County,
Defendant Texas

Defendant's Answer

WARNING: Talk to a lawyer **before** filling out this form. You may accidentally give up important legal rights if you file this form with the Court without first talking to a lawyer. For example, if you file an answer, you may be agreeing that the case can move forward in Texas. For help finding a lawyer, call your local lawyer referral service. If you do not have enough money to hire a lawyer to take your whole case, you can hire a lawyer just to give you advice and help you fill out this form. This is called Limited Scope Representation. You may also be able to talk to a lawyer for free at a legal advice clinic. For help finding a free legal advice clinic go to www.TexasLawHelp.org.

INSTRUCTIONS: If you decide to use this Defendant's Answer form:

- Fill it out completely and sign it.
- File (turn in) your completed answer form at the Courthouse where the Petition was filed.
- It does not cost anything to file an answer.
- If you have been served, you have a limited time to file an answer. Counting from the day you were served, you have 20 days plus the following Monday, at 10 a.m. to file an answer. If you do not file an answer by the deadline, the Plaintiff can ask the court to enter a default judgment against you.
- Keep a copy of your answer for your records.
- Send a copy to the Plaintiff's lawyer or to the Plaintiff if they are not represented by a lawyer.
- Filing an answer usually means you have 30 days to exchange **Required Initial Disclosures**. Read more at www.TexasLawHelp.org.

1. Defendant's Information

My name is Karla Jimenez . I am the Defendant in this Case.

The last three numbers of my driver's license number are 753 ____ ____ . My driver's license was issued in (State) TX _____ .

Or I do not have a driver's license number.

The last three numbers of my social security number are 665 ____ ____ .

Or I do not have a social security number.

2. General Denial Texas Rules of Civil Procedure Rule 92

I enter a general denial.

I request notice of all hearings in this case.

3. Specific Pleas Made Under Penalty of Perjury

Read Texas Rules of Civil Procedure Rule 93 for a list of specific pleas that must be verified or made under penalty of perjury. Ask a lawyer which specific pleas apply to your case.

I make the following specific pleas under penalty of perjury:

A denial of the execution by himself or by his authority of any instrument in writing, upon which any pleading is founded, in whole or in part, and charged to have been executed by him or by his authority, and not alleged to be lost or destroyed. Where such instrument in writing is charged to have been executed by a person then deceased, the affidavit shall be sufficient if it state that the affiant has reason to believe and does believe that such instrument was not executed by the decedent or by his authority. In the absence of such a sworn plea, the instrument shall be received in evidence a

4. Affirmative Defenses

Read Texas Rules of Civil Procedure Rule 94 for a list of affirmative defenses. Ask a lawyer which affirmative defenses apply to your case.

Note: An affirmative defense is an independent reason that the Plaintiff should not win the lawsuit. If an affirmative defense is successful, you could win the lawsuit, even if what the Plaintiff says is true. If you file an answer and do not claim an affirmative defense, you may forever give up that defense.

I claim the affirmative defenses checked below:

- | | | |
|-------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> accord and satisfaction | <input type="checkbox"/> estoppel | <input checked="" type="checkbox"/> license |
| <input type="checkbox"/> arbitration and award | <input type="checkbox"/> failure of consideration | <input type="checkbox"/> release |
| <input type="checkbox"/> assumption of risk | <input type="checkbox"/> fraud | <input type="checkbox"/> res judicata |
| <input checked="" type="checkbox"/> contributory negligence | <input type="checkbox"/> illegality | <input type="checkbox"/> statute of frauds |
| <input type="checkbox"/> discharge in bankruptcy | <input type="checkbox"/> injury to fellow servant | <input type="checkbox"/> statute of limitations |
| <input type="checkbox"/> duress | <input type="checkbox"/> laches | <input type="checkbox"/> waiver |
| <input type="checkbox"/> | | |

Write any other details regarding payment of the debt here:

I also claim these additional affirmative defenses:

I wish to plead the defense of failure to mitigate. I acted as a notary public for both the defendant and plaintiff. I obtained IDs and signatures and confirmed their identities before notarizing said contract.

I reserve the right to file an Amended Defendant's Answer with the Court to plead additional verified pleas, affirmative defenses and claims, cross-claims, or third-party claims, as applicable, after further investigation and discovery.

5. Request for Judgment

I ask that Plaintiff take nothing from this lawsuit. I ask for costs of court. I ask for such other and further relief, at law or in equity, to which I may be justly entitled.

Respectfully submitted,

<u> </u> ▶ /s Karla Jimenez Defendant's Signature	<u> </u> 9/14/2023 Date
<u> </u> Karla Jimenez Defendant's Printed Name	<u> </u> 832-686-3959 Phone
<u>15307 Quiet Creek Dr. Houston, TX 77095</u> Mailing Address	<u> </u> City <u> </u> State <u> </u> Zip
Email: <u>karla.c.jimenez@gmail.com</u>	<u> </u> Fax (if available) <u> </u>

I understand that I must let the Court, the Plaintiff's lawyer (or the Plaintiff if the Plaintiff does not have a lawyer), and any other party or lawyer in this case know in writing if my mailing address or email address changes during this case. If I don't, any notices about this case will be sent to me at the mailing address or email address on this form.

"Perjury" means making a false statement under oath, which is a crime, so everything in this Answer must be true.

6. Unsworn Declaration Made Under Penalty of Perjury

I make this unsworn declaration under penalty of perjury in place of verification as allowed by Texas Civil Practices and Remedies Code Section 132.001.

My name is: Karla Jimenez.

My date of birth is: 3/5/1994

My address is: 15307 Quiet Creek Dr. Houston TX 77095 USA

<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip Code</small>	<small>Country</small>
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I declare **under penalty of perjury** that: 1) I am the Defendant in this case, 2) I have read this Defendant's Answer, and 3) the statements in this Defendant's Answer are within my personal knowledge and are true and correct. I understand that it is a crime to lie on this form.

Formally signed **under penalty of perjury** in Harris County, TX,

<small>County</small>	<small>County</small>	<small>State</small>
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on this date: 9/14/2023


<small>Month</small>	<small>Day</small>	<small>Year</small>
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▶ /s Karla Jimenez
Defendant's Signature

7. Certificate of Service

I certify that a copy of this document was delivered to the Plaintiff's lawyer or the Plaintiff (if the Plaintiff does not have a lawyer) on the same day this document was filed with (turned in to) the Court as follows: (Check one.)

- through the electronic file manager if this document is being filed electronically
- by certified mail, return receipt requested
- by fax, to: _____
- by personal delivery
- by email to this email address: _____

 /s Karla Jimenez _____ 9/14/2023 _____
Defendant's Signature Date

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.

Envelope ID: 79537017

Filing Code Description: Answer/ Response / Waiver

Filing Description:

Status as of 9/14/2023 8:56 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Erik Garza		Erik@pgfirm.net	9/14/2023 8:51:09 AM	SENT