

CAUSE NO. 2023-68311

**TEXAS REAL ESTATE
DEVELOPMENTS LP,**
Plaintiff,

v.

**NEPTUNE ONE LLC,
et. al.,**

Defendants.

§ **IN THE DISTRICT COURT**
§
§
§ **OF HARRIS COUNTY, TEXAS**
§
§
§
§ **80th JUDICIAL DISTRICT**

**DEFENDANT'S ORIGINAL ANSWER AND AFFIRMATIVE
DEFENSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Neptune One LLC, Defendant, in the above numbered entitled cause and files Defendant's Original Answer and Affirmative Defenses, and in support of said answer would respectfully show the Court the following:

I. GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, the Defendant generally denies each and every, all and singular, the allegations contained in Plaintiff's Original Petition and demands strict proof by a preponderance of credible evidence.

II. AFFIRMATIVE DEFENSES

Defendant claims the affirmative defenses listed below and reserves the right to Amend Defendant's Original 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. Texas Rules of Civil Procedure, Rule 94.

FIRST AFFIRMATIVE DEFENSE

The Defendant asserts, the Plaintiff does not have the capacity to sue and the Court lacks subject-matter jurisdiction.

SECOND AFFIRMATIVE DEFENSE

The Defendant asserts, the Plaintiff's negligence is a direct result of any injuries the Plaintiff may have suffered.

THIRD AFFRIMATIVE DEFENSE

The Defendant asserts, the defense mistake of fact.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court enter judgment that the Plaintiff take nothing by his suit, that the Defendant recover his costs of court and for such other and further relief, both general and special, at law or in equity, to which Defendant may show himself justly entitled.

Respectfully submitted,
/s/Victor Anthony Charles
Victor Anthony Charles
Managing Member
For Neptune One LLC
9003 Vinearbor
Houston, Texas 77033
713 340 4168
wazeer.1@netzero.net

VERIFICATION

I, Victor Anthony Charles, hereby verify the statements of law and facts contained in Defendant's Original Answer and Affirmative Defenses are true and correct to the best my knowledge.

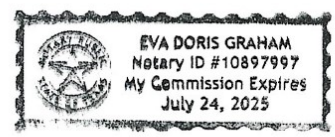
Affiant

Victor Anthony Charles
Victor Anthony Charles

Signed and sworn before me on the 16th day of October 2023.

Eva Doris Graham

Notary for the State of Texas



My commission expires on the 24 day of July 2025.

Unofficial Copy Office of Marilla Burgess District Clerk

CERTIFICATE OF SERVICE

I, Victor Anthony Charles., hereby certify a true and correct copy of the foregoing was sent on October 16, 2023, via electronic filing to the Plaintiff's attorney of record.

/s/ Victor Anthony Charles
Victor Anthony Charles

Unofficial Copy Office of Marilyn Burgess District Clerk

Automated Certificate of eService

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Status as of 10/16/2023 3:04 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Andrew M.Scott		ascott@grsm.com	10/16/2023 3:01:52 PM	SENT

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