

CAUSE NO. 202366239

IDEA 247, INC.

Plaintiff,

v.

**RAYMOND EPPS AKA
RAY EPPS,**

Defendant.

§
§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

189th JUDICIAL DISTRICT

DEFENDANT’S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Raymond Epps aka Ray Epps (“Defendant”), files this Original Answer to the Original Petition filed by Idea 247 Inc. (“Plaintiff”) and would respectfully show as follows:

I.
GENERAL DENIAL

Defendant generally denies each and every allegation contained in Plaintiff’s petition and demands strict proof of same. Defendant, subject to the foregoing general denial and without waiving same, reserves the right to answer the allegations contained in the Petition more fully at a later date, such right being held pursuant to the Constitution and the laws of the State of Texas and the Texas Rules of Civil Procedure.

II.
AFFIRMATIVE DEFENSES

1. The claims asserted against Defendant are barred in whole or in part by the doctrine of contributory negligence.

2. The claims asserted against Defendant are barred in whole or in part by the doctrine of laches.
3. The claims asserted against Defendant are barred in whole or in part by the doctrine of estoppel.
4. The claims asserted against Defendant are barred in whole or in part by the doctrine of waiver.
5. The claims asserted against Defendant are barred in whole or in part by the doctrine of release.
6. The claims asserted against Defendant are barred in whole or in part by the Parol Evidence Rule.
7. The claims asserted against Defendant are barred in whole or in part by the doctrine of adoption.
8. The claims asserted against Defendant are barred in whole or in part by the doctrine of accord and satisfaction.
9. The claims asserted against Defendant are barred in whole or in part by the doctrine of illegality.
10. The claims asserted against Defendant are barred in whole or in part by the doctrine of fraud.
11. The claims asserted against Defendant are barred in whole or in part by the doctrine of mistake.
12. The claims asserted against Defendant are barred in whole or in part by the statute of limitations.

13. The claims asserted against Defendant are barred in whole or in part by the doctrine of accident.
14. Plaintiff failed to mitigate and/or minimize its purported damages.
15. While Defendant denies that Plaintiff has suffered any injury, any injury sustained by Plaintiff is the result of acts or omissions of third parties, over whom Defendant exercised no control.

III.
CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Defendant prays that Plaintiff recover nothing by reason of the allegations made in the Plaintiff's petition and for such other and further relief to which they may be justly entitled.

Respectfully submitted this 19 day of March, 2024.

Respectfully submitted,

THE LANE LAW FIRM, PLLC

By: /s/ Robert C. Lane

Robert C. Lane

State Bar No. 24046263

notifications@lanelaw.com

Joshua D. Gordon

State Bar No. 24091592

joshua.gordon@lanelaw.com

A. Zachary Casas

State Bar No. 24097469

zach.casas@lanelaw.com

6200 Savoy Drive, Suite 1150

Houston, Texas 77036

(713) 595-8200 – Telephone

(713) 595-8201 – Fax

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 19 day of March, 2024 the foregoing was electronically filed and sent to the following attorneys of record:

Burford Perry LLP
Clyde J. "Jay" Jackson III
2 Houston Center
909 Fannin Street, Ste. 2630
Houston, TX 77010
jackson@burfordperry.com

By: /s/ Robert C. Lane
Robert C. Lane

Unofficial Copy Office of Marilyn Burgess District Clerk

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.

Lane Law on behalf of Robert Lane
Bar No. 24046263
Notifications@lanelaw.com
Envelope ID: 85698678
Filing Code Description: Answer/ Response / Waiver
Filing Description: DEFENDANT??S ORIGINAL ANSWER
Status as of 3/19/2024 11:04 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Clyde J. "Jay" Jackson III		jackson@BURFORDPERRY.COM	3/19/2024 10:40:50 AM	SENT
Burford Perry Service		service@burfordperry.com	3/19/2024 10:40:50 AM	SENT

Unofficial Copy Office of Marilyn Burgess District Clerk