

CAUSE NO. 2024-22273

JEFF and PAM STALLONES
Plaintiffs;

v.

JOSE O. RODRIGUEZ,
MARIA F. RODRIGUEZ, and
JOHN DOE TREE
TRIMMING SERVICE
Defendants.

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IN THE DISTRICT COURT OF

269TH JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

DEFENDANT'S ORIGINAL ANSWER

NOW COMES Defendants, Jose O. Rodriguez and Maria F. Rodriguez (“Defendants”), in the above entitled and numbered cause, and files this Defendants’ Original Answer, and would respectfully show the Court as follows:

GENERAL DENIAL

1. Defendants deny each and every allegation within Plaintiffs’ Original Petition and demands strict proof thereof as required by the Texas Rules of Civil Procedure.

AFFIRMATIVE DEFENSES

2. Plaintiffs’ claims are barred, in whole or in part, under the doctrine of waiver.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the above-named Defendants, Jose O. Rodriguez and Maria F. Rodriguez, having fully answered herein, prays that Plaintiffs go hence

without pay, for costs, and for such other and further relief, both special and general, at law and in equity, to which said Defendant may be justly entitled. Defendants pray the Court finds in favor of Defendants, and that Plaintiffs take nothing for their suit. Defendants further pray the Court award Defendants costs of court, attorney's fees, and such other and further relief Defendants may be entitled to in law or in equity.

Respectfully submitted,

TOUGH LAW FIRM PLLC

By: /s/Bruce C. Tough

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was served on parties listed below in accordance with the Texas Rules of Civil Procedure on April 24, 2024, by the means indicated:

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- by CMRRR
- by regular mail
- by overnight delivery
- by hand delivery
- by facsimile
- by electronic service via Texas efile

/s/Bruce C. Tough
Bruce C. Tough

Unofficial Copy Office of Marilyn Burges 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.

Bruce Tough on behalf of Bruce Tough
Bar No. 20151500
service@toughlawfirm.net
Envelope ID: 87005224
Filing Code Description: Answer/ Response / Waiver
Filing Description: Defendants' Original Answer
Status as of 4/24/2024 12:23 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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