CAUSE NO. 2023-88866

THE STATE OF TEXAS and HARRIS	§	IN THE DISTRICT COURT
COUNTY, TEXAS	§	
	§	
Plaintiff,	§	
	§	
VS.	§	OF HARRIS COUNTY, TEXAS
	§	
PT-PATRIOT TITLE, LLC and RACHEL	§	, W
LUNA	§	269 TH JUDICIAL DISTRICT
Defendants.		

RACHEL LUNA'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant Rachel Luna and files her *Original Answer*, and, in support thereof, would show the following:

I. GENERAL DENIAL

1. Defendant generally denies each and every, all and singular, the allegations of *Plaintiff's Original Petition and Application for Permanent Injunction*, and demands strict proof thereof by a preponderance of the credible evidence pursuant to Tex. R. Civ. P. 92.

II. PRAYER

WHEREFORE PREMISES CONSIDERED, Rachel Luna prays that Plaintiffs take nothing by their suit and that Rachel Luna be awarded costs and for such other and further relief, both in law and in equity, to which she is entitled.

Respectfully submitted,

/s/ David A. Nachtigall A. N.
Bar No. 2
5 Heights Blv.
Juston, Texas 7700.
el 713.229.0008
Fax 713.650.1602
david@dntriallaw.com

Attorney for Rachel Luna David A. Nachtigall State Bar No. 24049076

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was served by electronic filing and service on all other counsel of record or pro se parties on May 24, 2024.

CHRISTIAN D. MENEFEE

Harris County Attorney State Bar No. 24088049

Christian.Menefee@harriscountytx.gov

JONATHAN G.C. FOMBONNE

First Assistant County Attorney

State Bar No. 24102702

Jonathan.Fombonne@harriscountytx.gov

NEAL A. SARKAR

Special Assistant County Attorney

State Bar No. 24093106

Neal.Sarkar@harriscountytx.gov

KEVIN G. MARKOWSKI

State Bar No. 24127220

Kevin.Markowski@harriscountytx.gov

OFFICE OF THE HARRIS COUNTY ATTORNEY

1019 Congress Plaza, 15th Floor

Houston, Texas 77002

Telephone: (713) 274-5101 Facsimile: (713) 755- 8924

Attorneys for Plaintiff

/s/ David Nachtigall

David Nachtigall

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.

David Nachtigall on behalf of David Nachtigall Bar No. 24049076 david@dntriallaw.com Envelope ID: 88141389

Filing Code Description: Answer/ Response / Waiver

Filing Description:

Status as of 5/28/2024 8:39 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jonathan Fombonne		jonathan.fombonne@harriscountytx.gov	5/26/2024 4:06:27 PM	SENT
Neal Sarkar		Neal.Sarkar@harriscountytx.gov	5/26/2024 4:06:27 PM	SENT
Kevin Markowski		Kevin.Markowski@harriscountytx.gov	5/26/2024 4:06:27 PM	SENT
Andrea Mintzer		andrea.mintzer@harriscountytx.gov	5/26/2024 4:06:27 PM	SENT
Alysa Grissom		alysa@dntriallaw.com	5/26/2024 4:06:27 PM	SENT