

CAUSE NO. 2021-76268

**ZIONS BANCORPORATION, N.A. DBA
AMEGY BANK**

V.

**CHRISTINE R. BOONE AND THE HEIRS
AT LAW OF ANNA CHERYL EARLES-LOPEZ
EARLES-LOPEZ A/K/A CHERYL EARLS,
DECEASED**

**IN RE: 2012 MASSEY TOMPKINS RD
BAYTOWN, TEXAS 77521**

§ **IN THE DISTRICT COURT**
§
§
§ **HARRIS COUNTY, TEXAS**
§
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§
§
§
§
§ **190th JUDICIAL DISTRICT**

ATTORNEY AD LITEM'S ORIGINAL APPEARANCE AND ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, ANDREA ROTH, duly appointed Attorney Ad Litem for ANNA CHERYL EARLES-LOPEZ EARLES-LOPEZ A/K/A CHERYL EARLS, Defendant, cited by posting or publication herein, and on behalf of such Defendant, enters this Appearance and Answer, respectfully showing as follows:

I.

ANDREA ROTH, Attorney ad Litem, was appointed by the Court in that capacity on April 12, 2022, pursuant to the Texas Rules of Civil Procedure.

II.

ANDREA ROTH, Attorney ad Litem, on behalf of ANNA CHERYL EARLES-LOPEZ EARLES-LOPEZ A/K/A CHERYL EARLS and such person's unknown heirs, successors and assigns, cited by publication herein, enters her appearance.

III.

On behalf of the said Defendant, the Attorney ad Litem enters a general denial, and denies each and every, all and singular the allegations contained in Plaintiff's Original Petition and all subsequently amended Petition(s), and demands strict proof thereof.

The Attorney ad Litem adopts any pleadings herein that tend to promote the interest of the said Defendant.

IV.

It was necessary to render services to represent the best interest of ANNA CHERYL EARLES-LOPEZ EARLES-LOPEZ A/K/A CHERYL EARLS and her unknown heirs in this suit. The parties should be ordered to pay reasonable attorney ad litem fees and expenses as costs, and judgment should be rendered against the parties in favor of the Attorney ad Litem.

WHEREFORE PREMISES CONSIDERED, the Attorney ad Litem on behalf of the Defendant cited by publication herein prays that Plaintiffs take nothing and the Defendant have all such other and further relief, whether in law or equity, including Attorney ad Litem fees and expenses, as his causes may require.

Respectfully submitted,

BRANN SULLIVAN
TRIAL LAWYERS

/s/ Andrea S. Roth
ANDREA S. ROTH
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andrea@bstrial.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to all counsel of record on this 28th day April 2022, pursuant to the Texas Rules of Civil Procedure.

/s/ Andrea S. Roth
Andrea S. Roth

Via E-Serve

Eric Gould
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ATTORNEYS FOR PLAINTIFF

Negin Roberts
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ATTORNEY FOR DEFENDANT, CHRISTINE BOONE

Unofficial Copy Office of Marilyn Burgess District Clerk

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| Andrea Roth | | Andrea@bstrial.com | 4/28/2022 3:51:58 PM | SENT |

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