#### **CAUSE NO. 2024-62271**

ZIONS BANCORPORATION N.A.	§	IN THE DISTRICT COURT OF
D/B/A AMEGY BANK,	§	
	§	
Plaintiff,	§	< 1
	§	
VS.	§	HARRIS COUNTY TEXAS
	§	
INDEPENDENT TEXAS RECYCLERS, LLC,	§	
ECO GLASS RECYCLING, LLC, TRITGEN	§	
LLC, GLASS PARTNERS, LLC AND	§	
STEVEN RAGIEL,	§	
	§	
Defendants.	§	295th JUDICIAL DISTRICT

# ECO GLASS RECYCLING, LLC'S, GLASS PARTNERS, LLC'S AND STEVE RAGIEL'S ORIGINAL ANSWER TO PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURTS

COME NOW, defendants ECO GLASS RECYCLING, LLC ("Eco Glass"), GLASS PARTNERS, LLC ("Glass Partners"), and STEVE RAGIEL ("Ragiel") (Eco Glass, Glass Partners and Steve Ragiel hereinafter referred to as the "Defendants") and make this their Defendants Eco Glass Reclycling, LLC's, Glass Partners, LLC's and Steve Ragiel's Original Answer to Plaintiff's First Amended Original Petition, and would show the Court as follows:

I.

## **GENERAL DENIAL**

Pursuant to Tex. R. Civ. P. 92, the Defendants deny each and every, all and singular, allegations contained in the Plaintiff's First Amended Original Petition.

II.

### **JURY DEMAND**

The Defendants demand a trial by jury on all issues.

WHEREFORE, PREMISES CONSIDERED, the defendants, ECO GLASS RECYCLING, LLC, GLASS PARTNERS, LLC, and STEVE RAGIEL pray that, after a trial before a jury, the Plaintiff take nothing on its claims and causes of action, and the Court enter a take nothing judgment against the Plaintiff on its claims and causes of action.

DATED: October 21, 2024 THE PROBUS LAW FIRM

By: <u>/s/Matthew Probus</u>

Matthew Probus

State Bar No. 16341200

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ATTORNEYS FOR DEFENDANTS, ECO GLASS RECYCLING, LLC, GLASS PARTNERS, LLC, and STEVE RAGIEL

# **CERTIFICATE OF SERVICE**

This is to certify that on the 21st day of October 2024, a true and correct copy of the foregoing was delivered to counsel for all parties via electronic service through the Efile Texas system.

By: /s/ Matthew Probus
Matthew Probus

### **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.

Matthew Probus on behalf of Matthew Probus Bar No. 16341200

matthewprobus@theprobuslawfirm.com

Envelope ID: 93371106

Filing Code Description: Answer/ Response / Waiver

Filing Description: Defendants' Original Answer

Status as of 10/21/2024 3:10 PM CST

#### **Case Contacts**

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