

CAUSE No. 2024-75159

**WM COMERCIAL ATACADISTA
LTDA.**

v.

**BAILEY LAW FIRM PLLC and
JESSE LYNN BAILEY**

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

80th JUDICIAL DISTRICT

DEFENDANTS ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BAILEY LAW FIRM and JESSE LYNN BAILEY (“Bailey” or “Defendants”) file their Original Answer and respectfully show the Court as follows:

GENERAL DENIAL

Defendants deny each allegation made by plaintiffs WM Comercial Atacadista Ltda. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendants assert a general denial of the allegations and claims set forth in Plaintiffs’ pleadings and demand that Plaintiffs be required to prove their allegations against Defendants by a preponderance of the credible evidence and clear and convincing evidence, as required by the Constitution and laws of the State of Texas.

NOTICE PURSUANT TO T.R.C.P. 193.7

Defendants hereby provide actual notice under Rule 193.7 of the Texas Rules of Civil Procedure that any and all documents produced by any party to this lawsuit in response to written discovery may be used against that party in any pretrial proceeding or at trial.

RIGHT TO AMEND

Defendants reserve the right to amend this Answer in accordance with the Texas Rules of Civil Procedure and any scheduling order of the Court.

PRAYER

Defendants pray that Plaintiffs take nothing by this suit, that Defendants recover their costs of court and expenses, and that they be granted such other relief to which they may be justly entitled.

Respectfully submitted,

THE AKERS FIRM, PLLC

By Cordt C. Akers

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the District Attorney's Office this December 2, 2024.

/s/ Cordt C. Akers
Cordt C. Akers

Unofficial Copy Office of Marilyn Burgess District Clerk

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Filing Code Description: Answer/ Response / Waiver
Filing Description: Defendants Original Answer
Status as of 12/3/2024 8:44 AM CST

Case Contacts

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