

FILED

Marilyn Burgess
District Clerk

P-5

CAUSE NO. 2024-72879

DEC 02 2024

Time: 8:14am
Harris County, Texas

By C. Overton
Deputy

IN THE DISTRICT COURT

**JETALL
COMPANIES, INC**

Plaintiff,

v.

**CHRISTOPHER
WYATT,**

Defendant.

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OF HARRIS COUNTY, TEXAS

113TH JUDICIAL DISTRICT

DEFENDANT CHRISTPHER WYATT'S ORIGINAL ANSWER

Defendant Christopher Wyatt("Defendant" or "Wyatt") files this answer to Plaintiff or Jetall Companies, Inc. Original Petition (the "Answer"). In support of this Answer, Defendant respectfully shows the Court as follows:

GENERAL DENIAL

1. Under Texas Rule of Civil Procedure 92, Defendant Wyatt generally denies each and every, all and singular, allegation made against it in Plaintiff Jetall Companies, Inc's Original Petition and demands strict proof thereof.

2. Defendant reserves the right to amend and supplement this Answer in accordance with the Texas Rules of Civil Procedure, and expressly reserves the right to assert any additional defenses or claims which may be applicable.

AFFIRMATIVE DEFENSES

3. Subject to and without waiving any of the foregoing, under Texas Rule of Civil Procedure 94, Defendant asserts that Plaintiff's suit is barred in whole or part by the following affirmative defenses:

4. On or about January 4, 2021, Plaintiff filed an Original Petition in the 334th

District Court of Harris County, Texas under Cause No. 2021-00192. This Petition alleges and essentially contains the exact allegations contained in January 4, 2021 lawsuit. Jetall nonsuited its claims on or about January 20, 2023 without prejudice mere minutes before its principal, Ali Choudhri, was set to testify at a deposition in the Court's jury room (Exhibit A"). The reason for that nonsuit was obvious: Choudhri would have had no choice but to plead the Fifth Amendment, thereby torpedoing his claims and leading to dismissal on the merits.

5. On or about June 1, 2023, Plaintiff's counsel, Nicholas Petree, argued during a hearing before the Honorable Dawn Rogers that Jetall was actively pursuing a Federal lawsuit involving similar Third Party claims against Wyatt in the Southern District of Texas under Case No. 4:22-cv-00905 (Exhibit B). While Plaintiff's argued that Jetall was actively pursuing claims in the Federal Court Case, this as not factually accurate. In short, the counterclaims brought by Jetall were dismissed by the Honorable Judge Keith Ellison on or about September 5, 2024 for, among other things, Jetall's failure to exercise due diligence in seeking to serve Wyatt (Exhibit C).

6. Count 1 - Plaintiff's Claims for Breach of Contract alleging that Wyatt breached the terms of purported NDA are barred by a 4-year statute of limitations. Wyatt's last day of employment was on or before October 18, 2000 ("Exhibit D"). Despite the fact that Wyatt asserts he never executed such a NDA and asserts the NDA was fabricated by Ali Choudhri, this lawsuit was brought on October 20, 2024 after the expiration of statute of limitations under Chapter 16 of the Texas Civil Remedies Code. Moreover, It should be noted that United States Bankruptcy Judge Jeffrey P. Norman has found that Ali Choudhri created a Note and Deed of Trust without the payment of any consideration by the claimant and that they were fraudulently created after the fact by Ali Choudhri and that the Court believes Choudhri is a "forger and liar" (Exhibit E).

7. Plaintiff wrongfully asserts that Wyatt refused to return an original hard drive purportedly containing confidential information. This statement in Plaintiff's petition is blantly false. On or about June 20, 2013, Wyatt's counsel returned the original hard drive (Exhibit F).

Moreover, Plaintiff has failed to obtain any Order prohibiting the production of any documents produced under validly issued Subpoenas or as result of disclosures made under Rule 26 of the Federal Rules of Civil Procedure. As such, Plaintiff has acquiesced to the production of any purported confidential documents by failing to seek any Order preventing such production.

8. Count 3 – Plaintiff’s allegations asserting claims Defendant is liable under the “Texas Liability Act” for theft are barred by the 3-Year Statute of Limitations under Chapter 16 of the Civil Practices and Remedies Code.

9. Count 4 - Plaintiff’s allegations asserting claims Defendant breached his fiduciary duty are barred under Chapter 16 of the Texas Civil Remedies Code.

PRAYER FOR RELIEF

FOR THESE REASONS, Defendant Central Bank respectfully prays that the Court:

1. Find for Defendant on its affirmative defenses.
2. Order that Plaintiff take nothing against Defendant in this suit.
3. Dismiss all claims against Defendant with prejudice.
4. Order that Defendant recover all costs incurred in defense of Plaintiff’s claims,

and that Defendant’s judgment against Plaintiff include the following:

- a. Reasonable attorneys’ fees;
- b. Costs of suit; and
- c. Grant Defendant such other and further relief, general and special, at law or in equity, to which Defendant may be justly entitled.

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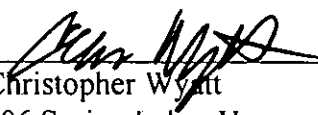
and that Defendant's judgment against Plaintiff include the following:

- a. Reasonable attorneys' fees;
- b. Costs of suit; and
- c. Grant Defendant such other and further relief, general and special, at law or in equity, to which Defendant may be justly entitled.

Dated: December 2, 2024

Respectfully submitted,

CHRISTOPHER WYATT




Christopher Wyatt
406 Spring Lakes Haven
Spring, Texas 77373
Telephone 832.768.0003
cwyatt@wyattconsultingservices.com

PRO SE

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2024, a true and correct copy of the foregoing instrument was served on counsel of record via regular mail pursuant to the Texas Rules of Civil Procedure.



Christopher Wyatt

Unofficial Copy Office of Marilyn Burgess District Clerk