

CAUSE NO. 2024-58180

EDWARD GARRETT, JR. AND  
MARIO V. GARRETT,  
Plaintiffs,

VS.

PINE BROOK HOMES, LP  
A TEXAS LIMITED PARTNERSHIP,  
Defendant.

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IN THE DISTRICT COURT

80<sup>th</sup> JUDICIAL DISTRICT OF

HARRIS COUNTY, TEXAS

**Original Answer of Pine Brook Homes, LP to Plaintiffs**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Pine Brook Homes, LP and files this its Original Answer and would show this Court as follows:

1. General Denial

Subject to such stipulations and admissions as may hereinafter be made, Defendant asserts a general denial as is authorized by Rule 92 of the Texas Rules of Civil Procedure, and Defendant respectfully requests that Plaintiffs be required to prove the charges and allegations made against Defendant by a preponderance of the evidence as is required by the Constitution and Laws of the State of Texas.

WHEREFORE PREMESIS CONSIDERED, Pine Brook Homes, LP prays that upon final trial of this matter that Plaintiffs be awarded nothing by way of this suit, that Defendant obtain declaratory judgment, and that Defendant be awarded attorney's fees and costs associated therewith.

Respectfully submitted,

**CHAVES OBREGON & PERALES, L.L.P.**  
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BY: /s/R. Gary Laws  
R. GARY LAWS  
State Bar No. 00786045

**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The foregoing document was electronically filed on this 6<sup>th</sup> day of September 2024. Notice of this filing will be sent to all parties via operation of the District Clerk's electronic filing system.

/s/R. Gary Laws  
R. GARY LAWS

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Bridget Brown on behalf of Raymond Laws

Bar No. 00786045

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Envelope ID: 91733889

Filing Code Description: Answer/ Response / Waiver

Filing Description: Original Answer of Pine Brook Homes LP to Plaintiffs

Status as of 9/6/2024 2:20 PM CST

#### Case Contacts

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Unofficial Copy Office of Marilyn Briggs District Clerk