

CAUSE NO. 2024-76386

LARRY PRESTON, SUI JURIS                    §     IN THE DISTRICT COURT OF  
v.     §     HARRIS COUNTY, TEXAS  
PHH MORTGAGE CORP., ET AL           §     333<sup>rd</sup> JUDICIAL DISTRICT

**DEFENDANT BARRY GROUP, LP AND NANIK BHAGIA’S ORIGINAL ANSWER**

Barry Group, LP and Nanik Bhagia file their Original Answer to Plaintiff’s Petition and state:

1. Defendants generally deny each and every allegation set forth in Plaintiff’s Petition and demands strict proof thereof by a preponderance of the evidence.
2. Defendants are not guilty.
3. Defendants additionally raise the affirmative defenses of waiver, estoppel, release, statute of fraud, statutes of limitations, bona fide purchaser, and privilege.

WHEREFORE, Defendants Barry Group, LP and Nanik Bhagia request that the Court dismiss Plaintiff’s claims, that Plaintiff take nothing by this action and that Defendants recover their attorney’s fees, costs of court, and for such other and further relief to which they may be justly entitled.

Respectfully Submitted

JERRY L. SCHUTZA

/s/ Jerry L. Schutza

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Unofficial Copy Office of Marilyn Burgess District Clerk

**ATTORNEY FOR BARRY GROUP, LP  
AND NANIK BHAGIA**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing legal instrument has been forwarded to all parties and/or their attorneys of record as provided under Rules 21 and 21a of the Texas Rules of Civil Procedure this the 3rd day of December 2024.

**VIA ELECTRONIC SERVICE & REGULAR MAIL**

Larry Preston  
5709 Langley  
Houston, Texas 77016

/s/ Jerry L. Schutza  
Jerry L. Schutza

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