

CAUSE NO. 198100313719

DEER PARK PAINT & BODY PLAINTIFF	§ § § § § § § § § §	IN THE JUSTICE COURT PRECINCT 1, PLACE 8 HARRIS COUNTY, TEXAS
VS.		
STATE FARM AUTOMOBILE INSURANCE COMPANY DEFENDANT		

**DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE
COMPANY'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW State Farm Mutual Automobile Insurance Company, Defendant in the above-styled and numbered cause, and files this, its Original Answer, and would respectfully show the Court the following:

1.

Defendant denies generally the material allegations contained in Plaintiff's Original Petition and inasmuch as said allegations are questions of fact, Defendant demands strict proof thereof by a preponderance of the evidence if Plaintiff can do so.

2.

Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Defendant hereby gives notice to Plaintiff that it intends to use all documents exchanged and produced between the parties (including, but not limited to, correspondence, pleadings, records and discovery responses) during the trial of this matter.

3.

For further answer, Defendant would respectfully demand a trial by jury with respect to any and all issues of fact.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that upon final trial and hearing hereof that Plaintiff take nothing against it, and that Defendant recover its costs, and for such other and further relief to which Defendant may show itself to be justly entitled, both at law and in equity.

Respectfully submitted,

/s/ Michael P. Hupf

Michael P. Hupf
State Bar No. 240102799

BRACKETT & ELLIS,
A Professional Corporation
100 Main Place
Fort Worth, Texas 76102-3090
817.338.1700
817.870.2265 - fax
bcampbell@belaw.com

ATTORNEYS FOR DEFENDANT
STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2019, a true and correct copy of the above and foregoing document has been served upon all counsel of record, in accordance with the Texas Rules of Civil Procedure.

/s/ Michael P. Hupf

Michael P. Hupf