

NO. D-1-GV-11-000356

THE STATE OF TEXAS	§	IN THE DISTRICT COURT
	§	
VS.	§	250TH JUDICIAL DISTRICT
	§	
LYDA NESS-GARCIA A/K/A LYDA ANASTASIA NESS-GARCIA	§	TRAVIS COUNTY, TEXAS

RESPONDENT'S ORIGINAL ANSWER

Lyda Ness-Garcia, Respondent, files this Original Answer to Plaintiff's Original Petition. The last three numbers of Lyda Ness-Garcia's driver's license number are 827. The last three numbers of Lyda Ness-Garcia's Social Security number are 302.

1. *General Denial*

Respondent enters a general denial.

2. *Affirmative Defenses*

Respondent further alleges the following affirmative defenses:

- a. accord and satisfaction and
- b. payment.

3. *Attorney's Fees, Expenses, Costs, and Interest*

It was necessary for Respondent to secure the services of LYDA A. NESS-GARCIA, a licensed attorney, to prepare and defend this suit. Respondent requests that reasonable attorney's fees, expenses, and costs through final judgment after appeal be taxed as costs and be ordered paid directly to Respondent's attorney, who may enforce the order in the attorney's own name. Respondent requests postjudgment interest as allowed by law.

4. *Prayer*

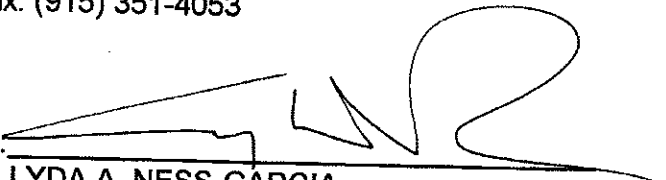
Respondent prays that Petitioner take nothing and that Respondent be granted all relief requested in this Original Answer.

Respondent also prays for attorney's fees, expenses, costs, and interest as requested above.

Respondent prays for general relief.

Respectfully submitted,

LYDA A NESS-GARCIA
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By: 
LYDA A. NESS-GARCIA
State Bar No. 90001279
Attorney for Respondent

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on April 18, 2011.


LYDA A. NESS-GARCIA
Attorney for Respondent