

CAUSE NO. DC-23-01174

CALVIN V. HOUSE,	§	IN THE DISTRICT COURT
	§	
<i>PETITIONER,</i>	§	
	§	
vs.	§	298TH JUDICIAL DISTRICT
	§	
TEXAS CENTRAL RAILROAD & INFRASTRUCTURE INC.,	§	
	§	
<i>RESPONDENT.</i>	§	DALLAS COUNTY, TEXAS
	§	

**RESPONDENT TEXAS CENTRAL RAILROAD & INFRASTRUCTURE INC.’S
ORIGINAL ANSWER TO PETITIONER CALVIN V. HOUSE’S VERIFIED PETITION
FOR ORAL DEPOSITION TO INVESTIGATE POTENTIAL CLAIMS
PURSUANT TO RULE 202**

NOW COMES Texas Central Railroad & Infrastructure Inc., Respondent in the above-styled and numbered cause, and files this Original Answer to Calvin V. House’s Verified Petition for Oral Deposition to Investigate Potential Claims Pursuant to Rule 202 (the “Petition”), and respectfully show the Court as follows:

I. GENERAL DENIAL

Pursuant to TEX. R. CIV. P. 92, Texas Central Railroad & Infrastructure, Inc. generally denies each and every, all and singular, of the allegations in the Petition and demands strict proof thereof.

Texas Central will show that the request for a Rule 202 deposition is simply an effort to re-litigate the case recently decided in its favor at the Texas Supreme Court. It will brief this issue for the Court as the case proceeds.

II. PRAYER

WHEREFORE, Texas Central Railroad & Infrastructure Inc. prays that Petitioner take nothing by way of this action, and that this Court deny the Petition, award Texas Central Railroad & Infrastructure Inc. court costs and expenses, as allowed by law, and grant Texas Central Railroad & Infrastructure Inc. all such other and further relief, general or special, at law or in equity, to which it may show itself to be justly entitled.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: 

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**ATTORNEYS FOR RESPONDENT
TEXAS CENTRAL RAILROAD &
INFRASTRUCTURE INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Texas Central Railroad & Infrastructure Inc.'s Original Answer to Calvin V. House's Verified Petition for Oral Deposition to Investigate Potential Claims Pursuant to Rule 202 has been served on the following by *electronic service*, on this 27th day of February, 2023:

Blake L. Beckham
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Robert B. Neblett

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Julie Short on behalf of Robert Neblett
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Case Contacts

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