

CAUSE NO. DC-22-09377

PETER CHERRY,
Plaintiff,

v.

ADAM BAZALDUA,
Defendant.

IN THE DISTRICT COURT

191ST JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

DEFENDANT, ADAM BAZALDUA'S, ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES ADAM BAZALDUA, Defendant in the above-styled and numbered cause, and files Defendant's Original Answer, and in support hereof would respectfully show unto the Court the following:

1.

GENERAL DENIAL

Defendant denies each and every, all and singular the material allegations made and contained in the Original Petition and any petition which Plaintiff may hereinafter file by way of amendment or supplement, and, in accordance with Texas law, demands that Plaintiff prove by a preponderance of the credible evidence each and every such allegation made and contained therein.

2.

AMOUNT OF RECOVERY

In addition to any other limitation under law, recovery of medical or health care expenses incurred is limited to the amount actually paid or incurred by or on behalf of the claimant.

3.

JURY REQUEST

Defendant respectfully requests a jury trial.

4.

DESIGNATED E-SERVICE EMAIL ADDRESS

The following is the undersigned attorney's designation of electronic service email address for all electronically served documents and notices, filed and unfiled, pursuant to Tex.R.Civ.P. 21(f)(2) & 21(a). (DallasLegal@allstate.com). This is the undersigned's ONLY electronic service email address, and service through any other email address will be considered invalid.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that Plaintiff take nothing by this suit against Defendant, that Defendant be discharged, and that the Court grant such other and further relief, both general and special, at law and in equity to which Defendant may be justly entitled.

Respectfully submitted,

LISA CHASTAIN & ASSOCIATES



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ATTORNEY FOR DEFENDANT

ADAM BAZALDUA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served in compliance with Rules 21 and 21a of the Texas Rules of Civil Procedure on the 4th day of October, 2022, to:

BEN ABBOTT & ASSOCIATES, PLLC
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ATTORNEY FOR PLAINTIFF



THERESA A. SEWELL (BYRD)

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.

Britney Gonzales on behalf of Theresa Byrd

Bar No. 791638

britney.gonzales@allstate.com

Envelope ID: 68889972

Status as of 10/5/2022 9:13 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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