

CAUSE NO. 19-7298-367

ROBERT OBLON,	§	IN THE DISTRICT COURT OF
Plaintiff,	§	
v.	§	DENTON COUNTY, TEXAS
JORDAN BROCK,	§	
Defendant.	§	367 TH JUDICIAL DISTRICT

DEFENDANT’S ORIGINAL ANSWER

Defendant Jordan Brock (“Defendant”) files his Original Answer to Plaintiff Robert Oblon’s (“Plaintiff”) Original Petition (“Petition”) and states:

GENERAL DENIAL

Defendant denies generally and specially the material allegations contained in the Petition and demands strict proof thereof in accordance with the requirements of the laws of this state.

AFFIRMATIVE DEFENSES

Defendant denies the allegations in the Petition, but would show, in the alternative that the following affirmative defenses would apply:

1. Plaintiff’s claims are barred, in whole or in part, by the applicable statute of limitations.
2. Plaintiff’s claims are barred, in whole or in part, by failure or lack of consideration.
3. Plaintiff’s claims are barred, in whole or in part, by the doctrine of waiver.

4. Plaintiff's claims are barred, in whole or in part, by the doctrine of privilege or justification.

5. Plaintiff's claims are barred, in whole or in part, by the doctrine of estoppel.

6. Plaintiff's claims are barred, in whole or in part, by the doctrine of laches.

7. Plaintiff's claims are barred, in whole or in part, based on his unclean hands.

8. Plaintiff's claims are barred, in whole or in part, due to his lack of standing or capacity.

9. Plaintiff's claims are barred, in whole or in part, based on the statute of frauds.

10. Plaintiff's claims are barred, in whole or in part, based on the doctrine of ratification.

11. Plaintiff's claims are barred, in whole or in part, as Plaintiff's own acts or omissions caused or contributed to Plaintiff's alleged injury, if any.

12. Plaintiff's claims are barred, in whole or in part, because he is libel-proof.

RELIEF REQUESTED

Defendant requests the following relief:

13. that Plaintiff take nothing by reason of his claims;

14. that Defendant be dismissed with his costs; and

15. that Defendant has such other and further relief, both general and special, at law and in equity, to which he may show himself justly entitled.

Respectfully submitted,

By: /s/ Andrew P. Speicher

Michael G. Brown
State Bar No. 03153800
mike.brown@figdav.com
Andrew P. Speicher
State Bar No. 24027878
drew.speicher@figdav.com

FIGARI + DAVENPORT, LLP
901 Main Street, Suite 3400
Dallas, TX 75202
Tel: 214.939.2000
Fax: 214.939.2090

ATTORNEYS FOR DEFENDANT
JORDAN BROCK

CERTIFICATE OF SERVICE

On the 6th day of September, 2019, the foregoing instrument was served via efile.txcourts.gov on Howard J. Klatsky (hklatsky@feesmith.com), Fee, Smith, Sharp & Vitullo, L.L.P., Three Galleria Tower, 13155 Noel Road., Suite 1000, Dallas, TX 75240.

/s/ Andrew P. Speicher

Andrew P. Speicher