



**General Denial**

Pursuant to Rule 92 of the TEXAS RULES OF CIVIL PROCEDURE, Defendants generally deny each and every material claim and allegation in Plaintiffs' Petition for Declaratory Relief and Application for Writs of Mandamus, and all amendments thereto and demands strict proof thereof. As authorized by the TEXAS RULES OF CIVIL PROCEDURE, Defendants reserve the right to amend this pleading before the trial on the merits in this cause.

**Prayer**

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that all relief requested against it in Plaintiffs' Petition for Declaratory Relief and Application for Writs of Mandamus be denied, and for any such other and further relief to which it may be justly entitled.

Respectfully Submitted,

ANDY TAYLOR & ASSOCIATES, P.C.

BY: /s/Andy Taylor

Andy Taylor  
State Bar No. 19727600  
2668 Highway 36S, #288  
Brenham, Texas 77833  
713-222-1817 (telephone)  
713-222-1855 (facsimile)

ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above document has been delivered to the attorney below on the 4<sup>th</sup> day of March, 2016 via the electronic filing system..

Jack Ternan  
Brewer, Attorneys & Counselors  
1717 Main Street, Suite 5900  
Dallas, Texas 75201  
Office: 214.653.4867  
Fax: 214.653.1015  
[jgt@brewerattorneys.com](mailto:jgt@brewerattorneys.com)

/s/Andy Taylor  
Andy Taylor