

NO. 2008-66714

BUCKLEY, WHITE, CASTANEDA  
& HOWELL, L.L.P.

Plaintiff,

VS.

CITIBANK, N.A.

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, T E X A S

61<sup>ST</sup> JUDICIAL DISTRICT

**CITIBANK, N.A.'S ORIGINAL ANSWER**

COMES NOW, <sup>2-1</sup> Citibank, N.A. ("Citibank"), Defendant in the above-styled and numbered cause and, pursuant to the Texas Rules of Civil Procedure, files its Original Answer to Plaintiff Buckley, White, Castaneda & Howell, L.L.P.'s ("BWCH") Original Petition and in support thereof would respectfully show the Court as follows.

**GENERAL DENIAL**

Citibank asserts a general denial authorized by Rule 92 of the Texas Rules of Civil Procedure generally denying each and every material allegation contained in Plaintiff's Original Petition, says that same is not true in whole or in part, and exercises its legal right to require BWCH to prove all its allegations and causes of action by a preponderance of the evidence and demands strict proof thereof before a jury.

As authorized by the Texas Rules of Civil Procedure, Citibank reserves the right to amend this pleading before trial of this case on the merits.

FILED  
BY 12/5/08  
CLERK

8787573

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Citibank respectfully prays that judgment be entered that Plaintiff BWCH take nothing by reason of its claims, that Citibank recover all costs of suit incurred, and for such other general relief to which it may show itself justly entitled.

Respectfully submitted,

WINSTEAD PC

By: Yasmin Atasi / by permission SMH  
Yasmin Atasi  
State Bar No. 10435150

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**ATTORNEYS FOR CITIBANK, N.A.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was forwarded to Plaintiff's counsel of record via facsimile and certified mail, return receipt requested, on this the \_\_\_\_ day of December, 2008:

Jeffrey W. Glass  
Jeffrey W. Glass, P.C.  
2401 Fountainview, Suite 1000  
Houston, Texas 77057  
Facsimile: 713.789.7703  
**Certified Mail – Return Receipt Requested**

Emily Herbst  
Emily Herbst