

CAUSE NO. 2017-11526

ANNID HOUSTON, INC.

Plaintiff,

VS.

HYACINTH ENYINNIA, UZO EKUME,
AND SHEGUN OLAGUNDOYE

Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

61st JUDICIAL DISTRICT

**DEFENDANTS ENYINNIA AND EKUME'S
ORIGINAL ANSWER AND REQUEST FOR DISCLOSURE**

TO THE HONORABLE COURT:

Defendants Hyacinth Enyinnia and Uzo Ekume ("Defendants"), asks the Court to enter a take nothing judgment in their favor and against Plaintiff ANNID Houston, Inc. ("ANNID").

General Denial

1. Defendants generally deny Plaintiff's claims against them. Tex. R. Civ. P. 92.

Affirmative Defenses

Pursuant to Tex. R. Civ. P. 94, Defendants assert the following by way of affirmative defenses:

2. Plaintiff has unclean hands;
3. Plaintiff committed fraud;
4. Plaintiff is estopped to recover; and
5. Plaintiff waived its right to recover.

Damages

6. Plaintiff's damages, if any and which Defendants deny, are subject to all applicable damage caps and limitations, both compensatory and punitive, which are provided by law.

7. Any claim for punitive or exemplary damages is subject to the limitations and constraints of Due Process found in the Fifth and Fourteenth Amendments to the United States Constitution.

REQUEST FOR DISCLOSURE

Defendants request that Plaintiff disclose the information identified in Tex. R. Civ. P. 194.2.

REQUEST FOR RELIEF

FOR THESE REASONS, Defendant Olushegun Olagundoye asks the Court to a) deny Plaintiff ANNID HOUSTON, Inc.'s request for relief, b) enter a take-nothing judgment in his favor and against Plaintiff, and c) grant other relief to which he may show himself entitled.

Respectfully submitted,

THE GREENWOOD LAW FIRM

/s/ Sean Greenwood

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ATTORNEY FOR DEFENDANT,
OLUSHEGUN OLAGUNDOYE

CERTIFICATE OF SERVICE

I certify that, on May 21, 2018, I served a true and correct copy of the foregoing Defendants Original Answer on all counsel of record in accordance with the Texas Rules of Civil Procedure, via electronic filing:

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/s/ Sean Greenwood
Sean Greenwood