

NO. 2017-36216

HOUSTON FIREFIGHTERS' RELIEF AND RETIREMENT FUND,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
CITY OF HOUSTON, ET AL.,	§	
	§	
Defendants.	§	190TH JUDICIAL DISTRICT

**CERTAIN DEFENDANTS' ORIGINAL ANSWER SUBJECT TO
CERTAIN DEFENDANTS' PLEA TO THE JURISDICTION**

Subject to the plea to the jurisdiction asserted separately by them, Defendants Sylvester Turner, Brenda Stardig, Jerry Davis, Ellen Cohen, Dwight Boykins, Dave Martin, Steve Le, Greg Travis, Karla Cisneros, Robert Gallegos, Mike Laster, Larry Green, Mike Knox, David Robinson, Michael Kubosh, Amanda Edwards, and Jack Christie (collectively, "Defendants") file this Original Answer to Plaintiff Houston Firefighters' Relief and Retirement Fund's ("Plaintiff") First Amended Petition and Application for Temporary and Permanent Injunction, and specifically reserve their rights to further amend as permitted by the Texas Rules of Civil Procedure.

I. GENERAL DENIAL

1. Defendants generally deny each and every allegation and matter pleaded and alleged by Plaintiff and demand strict proof thereof pursuant to Rule 92 of the Texas Rules of Civil Procedure.

II. AFFIRMATIVE DEFENSES

2. Defendants plead immunity from suit as a jurisdictional bar to all claims alleged by Plaintiff.

3. Defendants plead immunity from liability as an affirmative defense to all claims alleged by Plaintiff.

4. Defendants plead legislative immunity as an affirmative defense to all claims alleged by Plaintiff.

5. The conduct about which Plaintiff complains (if true) was discretionary.

6. Defendants plead the doctrine of official immunity as an affirmative defense to the extent that Plaintiff sues any individual Defendant in his or her individual or personal capacity.

III. PRAYER

Defendants pray that Plaintiff's application for injunction relief be denied, and for a take-nothing judgment, costs, and all other just relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This pleading has been served upon all counsel of record in compliance with the Texas

Rules of Civil Procedure on June 20, 2017:

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