

NO. 2017-36216

HOUSTON FIREFIGHTERS' RELIEF AND
RETIREMENT FUND,

Plaintiff,

v.

CITY OF HOUSTON, ET AL.,

Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

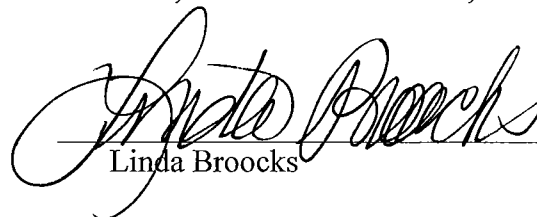
190TH JUDICIAL DISTRICT

**DEFENDANTS KELLY DOWE AND CHRIS B. BROWN'S RESPONSE IN
OPPOSITION TO PLAINTIFF'S APPLICATION FOR TEMPORARY INJUNCTION,
SUBJECT TO DEFENDANTS' PLEA TO THE JURISDICTION**

Subject to their separately asserted pleas to the jurisdiction, and without waiving the same, Defendants Kelly Dowe and Chris B. Brown (collectively, "Defendants"), file this Response in Opposition to the Application for Temporary Injunction filed by Plaintiff Houston Firefighters' Relief and Retirement Fund ("HFRRF"), incorporating in their entirety the arguments set forth in the Response in Opposition to Plaintiff's Application for Temporary Injunction, filed this day by Mayor Sylvester Turner and others ("Certain Defendants' Response"). And for the reasons stated in Certain Defendants' Response, Defendants respectfully request that the Court deny HFRRF's Application for Temporary Injunction, grant Defendants' pleas to the jurisdiction, and dismiss this lawsuit. Defendants seek all other and further relief to which they are entitled.

Respectfully submitted,

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Counsel for Kelly Dowe and Chris B. Brown

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.

/s/ Linda Broocks

Linda Broocks