

singular, each and every material allegation contained in Plaintiffs' Original Petition and any subsequent petition filed by Plaintiffs and demands strict proof of the same by a preponderance of the evidence.

II.

AFFIRMATIVE AND OTHER DEFENSES

Defendant pleads the following affirmative and other defenses:

2.1 Defendant is entitled to all caps and limitations on damages pursuant to the Texas Civil Practice & Remedies Code.

2.2 Defendant is not responsible for any expense or damages allegedly incurred by Plaintiffs due to the acts, conduct, negligence and/or failure to exercise reasonable care by other third parties over whom Defendant did not control.

2.3 Defendant denies that he made any defamatory publications whatsoever concerning Plaintiffs. Alternatively, to the extent any statement made by Defendant is alleged by Plaintiffs to have been defamatory, any such statement was: (1) true; (2) substantially true; (3) absolutely privileged; (4) qualifiedly privileged; (5) made without malice or negligence; and/or (6) not published.

2.4 Additionally, Plaintiffs' reputation, if diminished, was diminished due to the acts of other third parties over whom this Defendant lacked control. Defendant asserts and invokes the defense of comparative responsibility pursuant to Texas Civil Practice & Remedies Code Chapter 33 and asks the trier of fact to determine the percentage of responsibility of each person or entity, whether or not joined in this lawsuit, for the alleged injuries and damages about which Plaintiffs complain.

2.5 Plaintiffs have failed to state a viable cause of action for libel or slander because no such false statement(s) was made by this Defendant and Plaintiff has no evidence of any damages.

2.6 Plaintiffs' claims for exemplary damages are barred as Plaintiffs did not provide the Defendant with a written request for correction, clarification or retraction as required by Texas Civil Practice & Remedies Code Section 73.055(c).

2.7 Plaintiffs failed to make a timely and sufficient request for a correction, clarification, or retraction from this Defendant therefore, Plaintiffs are not entitled to maintain an action for defamation pursuant to Texas Civil Practice & Remedies Code Section 73.005(a).

2.8 Defendant asserts one or more of Plaintiffs claims against this Defendant are barred by the applicable statute of limitations.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests this Court to dismiss Plaintiffs' claims and causes of action with prejudice, that the Plaintiffs take nothing by their suit and that the Defendant has judgment for its costs and all other and further relief to which Defendant show himself justly entitled.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, LLP

By: /s/ Brian D. Hensley

Brian D. Hensley

State Bar No. 24036759

Mycal J. Dédé

State Bar No. 24131168

2801 Via Fortuna, Suite 300

Austin, Texas 78746

Phone: (512) 708-8200

Fax: (512) 708-8777

Email: bhensley@thompsoncoe.com

Email: MDede@thompsoncoe.com

**ATTORNEYS FOR DEFENDANT
JEREMY CARRASCO**

CERTIFICATE OF SERVICE

By my signature above, I hereby certify that a true and correct copy of the foregoing has been delivered on this the 1st day of August 2025, to the following counsel of record via e-service:

Richard Hardy	Via E-Service: rhardy@fchclaw.com
Meghan Mitchell	Via E-Service: mmitchell@fchclaw.com
Jodee Rankin	Via E-Service: jrankin@fchclaw.com
Joshua Conaway	
FADDUOL, CLUFF, HARDY & CONAWAY, PC	
1115 Broadway	
Lubbock, Texas 79401	

Joshua Conaway	Via E-Service: jconaway@fchclaw.com
3301 San Mateo Blvd. NE	
Albuquerque, NM 87110	
<i>Pending Pro Hac Vice</i>	

And	
S. Alex Yaffe	Via E-Service: ay@fylaw.com
Eric J. Cavett	Via E-Service: ejc@fylaw.com
P.O. Box 890420	
Oklahoma City, OK 73189	
<i>Pending Pro Hac Vice</i>	

/s/ Brian D. Hensley
Brian D. Hensley

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Velma Ellis on behalf of Brian Hensley

Bar No. 24036759

VEllis@thompsoncoe.com

Envelope ID: 103898050

Filing Code Description: Original Answer - General Denial

Filing Description: Defendant Jeremy Carrasco's Original Answer

Status as of 8/5/2025 10:41 AM CST

Associated Case Party: CINDY CLEMISHIRE

Name	BarNumber	Email	TimestampSubmitted	Status
Matthew Heape		mheape@fchclaw.com	8/1/2025 5:20:01 PM	SENT
Meghan Mitchell		mmitchell@fchclaw.com	8/1/2025 5:20:01 PM	SENT
Kim Ewalt		kewalt@fchclaw.com	8/1/2025 5:20:01 PM	SENT
Jodee Rankin		jrankin@fchclaw.com	8/1/2025 5:20:01 PM	SENT
Makayla Simonton		msimonton@fchclaw.com	8/1/2025 5:20:01 PM	SENT
RICHARD HARDY		RHARDY@FCHCLAW.COM	8/1/2025 5:20:01 PM	SENT
Gabriela Reveles		greveles@fchclaw.com	8/1/2025 5:20:01 PM	SENT

Associated Case Party: GAYLAND LAWSHE

Name	BarNumber	Email	TimestampSubmitted	Status
Steven Grossman		sgrossman@hou-law.com	8/1/2025 5:20:01 PM	SENT
Karen Bowden		kbowden@hou-law.com	8/1/2025 5:20:01 PM	SENT
Todd Newman		tnewman@hou-law.com	8/1/2025 5:20:01 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mycal Dede		Mdede@thompsoncoe.com	8/1/2025 5:20:01 PM	SENT
Velma Ellis		VEllis@thompsoncoe.com	8/1/2025 5:20:01 PM	SENT
Monica Romero		mromero@thompsoncoe.com	8/1/2025 5:20:01 PM	SENT
Brian Hensley		bhensley@thompsoncoe.com	8/1/2025 5:20:01 PM	SENT