

Cause No. 16-000649-CV-85

SOUTHSIDE RANCH, LLC  
Plaintiff

vs.

THE KNOWN AND  
UNKNOWN HEIRS OF  
JOSHUA WASHINGTON, SR.,  
Defendants

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IN THE DISTRICT COURT

BRAZOS COUNTY, TEXAS

85<sup>th</sup> JUDICIAL DISTRICT

SUSAN HARGRAVE'S ORIGINAL ANSWER

NOW COMES Susan Hargrave, Defendant in the above numbered and styled cause and file this her Original Answer to Plaintiff's Petition in the above styled and numbered cause, and would show the Court as follows:

I.

Defendant generally denies the material allegations of Plaintiff's Petition and demand strict proof thereof by a preponderance of the credible evidence.

II.

Defendant Hargrave is deceased and has filed a Suggestion of Death in this matter.

Defendant Hargrave asserts that she is not a proper party to this lawsuit as she transferred all of her interest in the property to Plaintiff by deed.

WHEREFORE, Defendant respectfully prays that all relief sought by Plaintiff herein be denied, and that Defendant recover all costs of Court, and that she have such other and further relief to which she may be justly and equitably entitled.

RESPECTFULLY SUBMITTED,

BRUCHEZ, GOSS, THORNTON,  
MERONOFF & BRIERS, P.C.  
4343 Carter Creek Parkway, Suite 100  
Bryan, Texas 77802  
(979) 268-4343  
(979) 268-5323 FAX

By: \_\_\_\_\_/S/Jay B. Goss

JAY B. GOSS  
State Bar No. 08222600  
[jgoss@bruchez.com](mailto:jgoss@bruchez.com)

CERTIFICATE OF SERVICE

I hereby certify that in accordance with the Rules of Civil Procedure that a true and correct copy of the foregoing has been served on counsel of record in the manner checked below on this the 9<sup>th</sup> day of August, 2018, as follows:

_____	1.	Hand Delivery
_____	2.	Regular U.S. Mail - Postage Prepaid
_____	3.	Facsimile
_____XX	4.	E-Mail - E-Filing

Gaines West  
Padon Holt  
West, Webb, Allbritton & Gentry, PC  
1515 Emerald Plaza  
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\_\_\_\_\_/S/Jay B. Goss\_\_\_\_\_  
JAY B. GOSS

85th District Court of BRAZOS County, Texas  
300 EAST 26TH ST., STE. 224 BRYAN TX 77803

CASE #: 16-000649-CV-85

GREGG FALCONE AND/OR SOUTHSIDE RANCH, LLC

Plaintiff

vs

THE KNOWN AND UNKNOWN HEIRS OF JOSHUA WASHINGTON

Defendant

AFFIDAVIT OF SERVICE

I, MARQUISHA GRAVES-LEWIS, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to  
this action, nor interested in outcome of the suit. That I received the documents stated  
below on 12/19/17 12:58 pm, instructing for same to be delivered upon Hargrave, Susan.

That I delivered to : Hargrave, Susan.

the following : CITATION; DEFENDANTS SECOND AMENDED ORIGINAL ANSWER AND  
SECOND AMENDED COUNTER CLAIM AND FIRST CLAIM AGAINST THIRD  
PARTIES

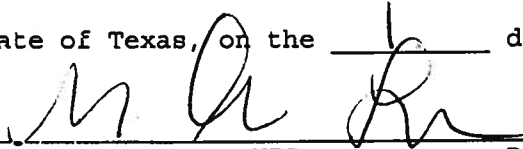
at this address : 1015 Sunrise Court  
CEDAR HILL, Dallas County, TX 75104

Manner of Delivery : By PERSONALLY delivering the document(s) to the person  
above.

Delivered on : Monday JAN 29, 2018 9:26 am

My name is MARQUISHA GRAVES-LEWIS, my date of birth is OCT 9th, 1981, and my address  
is Professional Civil Process Dallas, Inc., 2300 Valley View Ln, Ste 612, Irving TX  
75062, and U.S.A. I declare under penalty of perjury that the foregoing is true and  
correct.

Executed in Dallas County, State of Texas, on the 1 day of  
Feb, 20 18.

  
MARQUISHA GRAVES-LEWIS Declarant  
2439

Texas Certification#: PSC-12308 Exp. 09/30/2019

PCP Inv#: D17C00266  
SO Inv#: A17C04189



+ Service Fee: 75.00  
Witness Fee: .00  
Mileage Fee: .00

tomcat  
eaffidavits@pcpusa.net

Youngkin, Bill

E-FILE RETURN

CLERK OF THE COURT  
Marc Hamlin  
300 East 26<sup>th</sup> Street, Suite 1200  
Bryan, TX 77803

ATTORNEY  
Bill Youngkin  
PO Box 4806  
Bryan, TX 77805

THE STATE OF TEXAS

CITATION

NOTICE TO THE DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

To: Susan Hargrave who may be served at 1015 Sunrise Court, Cedar Hill, Texas 75104. Defendant,

Greeting:

You are hereby commanded to appear by filing a written answer to the Defendants Second Amended Original Answer and Second Amended Counterclaim and First Claim Against Third Parties at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable 85th District Court of Brazos County, Texas at the Courthouse of said County in Bryan, Texas. Said Petition was filed on December 13, 2017 in the case, numbered 16-000649-CV-85 on the docket of said court, and styled,


GREGG FALCONE and/or Southside Ranch, LLC vs. THE KNOWN AND UNKNOWN HEIRS OF JOSHUA WASHINGTON SR

The nature of Plaintiff's demand is fully shown by a true and correct copy of the Defendants Second Amended Original Answer and Second Amended Counterclaim and First Claim Against Third Parties accompanying this citation and made a part thereof.

The officer executing the writ shall promptly serve the same according to requirements of the law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and sealed of said Court at office, on this the 13th day of December, 2017.

Marc Hamlin  
Clerk of Brazos County, Texas

By  Deputy

OFFICER'S RETURN

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M.  
Executed at \_\_\_\_\_, within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by delivering to the within named \_\_\_\_\_

\_\_\_\_\_ each, in person, a true copy of this citation together with the accompanying copy of the petition, having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

Total fee for serving this citation \_\_\_\_\_

Sheriff Account

To certify which witness my hand officially.

No. \_\_\_\_\_

For Clerk's Use

Taxed \_\_\_\_\_

Returned Record \_\_\_\_\_

Sheriff of \_\_\_\_\_ County, Texas

By \_\_\_\_\_ Deputy