

CAUSE NO. 2017-84942

**JIM OLIVE PHOTOGRAPHY, D/B/A
PHOTOLIVE, INC.,**

Plaintiff,

v.

THE UNIVERSITY OF HOUSTON SYSTEM,

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

295TH JUDICIAL DISTRICT

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant, The University of Houston, and files this, its Original Answer, and in support would respectfully show the Court as follows:

I. GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant generally denies each and every allegation in Plaintiff's Original Petition and demands strict proof thereof.

II. DEFENSES

1. Defendant asserts the defense of sovereign immunity to suit for all claims to which this defense applies;
2. Defendant asserts the defense of limitations for all claims outside of the applicable limitations period and for Plaintiff's violations of any other timeliness requirements stated under the applicable statutes;
3. Plaintiff has failed to mitigate his damages, if any; and
4. Defendant reserves the right to raise additional defenses as becomes apparent during the development of the case.

III. PRAYER

Defendant prays that Plaintiff take nothing by his suit, that all costs be taxed and adjudged against the Plaintiff, and that Defendant be granted any other and further relief to which it may be justly entitled.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed and served electronically on **January 26, 2018**.

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Unofficial Copy Office of Chris D. Long District Clerk