Velva L. Price District Clerk Travis County D-1-GN-18-001583 Irene Silva

CAUSE NO. D-1-GN-18-001583

ANN HARRIS BENNETT, HARRIS	§	IN THE DISTRICT COURT OF
COUNTY TAX ASSESSOR-	§	
COLLECTOR AND VOTER	§	
REGISTRAR,	§	
Plaintiff,	§	
	§	TRAVIS COUNTY, TEXAS
v.	§	
	§	
HONORABLE KEN PAXTON,	§	
ATTORNEY GENERAL OF TEXAS,	§	
Defendant.	§	459th JUDICIAL DISTRICT

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Ken Paxton, Attorney General of Texas, files Defendant's Original Answer in reply to Plaintiff's Original Petition for Declaratory Judgment and other Relief.

GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, the Attorney General enters a general denial to all of Plaintiff's allegations.

PRAYER

Defendant Ken Paxton, Attorney General of Texas, respectfully asks the Court, upon final hearing of this lawsuit, to enter a final judgment declaring the information at issue to be subject to disclosure and orders that Plaintiff Ann Harris Bennett take nothing by reason of her suit and that all costs of litigation, including court costs, be adjudged against Plaintiff.

Defendant further prays for such other and further relief, both general and special, at law and in equity, to which he may be justly entitled.

Respectfully submitted,

KEN PAXTON Attorney General of Texas

JEFFREY C. MATEER First Assistant Attorney General

BRANTLEY STARR Deputy First Assistant Attorney General

JAMES E. DAVIS Deputy Attorney General for Civil Litigation

NICHOLE BUNKER-HENDERSON Chief, Administrative Law Division

/s/ Matthew R. Entsminger

MATTHEW R. ENTSMINGER State Bar No. 24059723 Chief, Open Records Litigation Administrative Law Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 Telephone: (512) 475-4151 Facsimile: (512) 457-4686

matthew.entsminger@oag.texas.gov

ATTORNEYS FOR DEFENDANT KEN PAXTON, ATTORNEY GENERAL OF TEXAS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Original Answer of Defendant Ken Paxton, Attorney General of Texas, has been served, on April 16, 2018, on the following attorney-in-charge, by electronic transmission and/or e-mail:

KRISTEN LEE

State Bar No. 24064545

VINCE RYAN, HARRIS COUNTY ATTORNEY

1019 Congress, Fifteenth Floor

Houston, Texas 77002

Telephone: (713) 755-5101 Facsimile: (713) 755-2681

Kristen.Lee@cao.hctx.net

ATTORNEY FOR PLAINTIFF

ANDY TAYLOR

State Bar No. 19727600

ANDY TAYLOR & ASSOCIATES, P.C.

2628 Highway 36 South #288

Brenham, Texas 77833

Telephone: (713) 222-1817

Facsimile: (713) 222-1855

ataylor@andytaylorlaw.com

ATTORNEY FOR INTERVENOR

/s/ Matthew R. Entsminger

MATTHEW R. ENTSMINGER

Attorney for Defendant