

NO. DF-15-09887-S

IN THE INTEREST OF

§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

J.A.D.Y. and J.U.D.Y.,

255<sup>TH</sup> JUDICIAL DISTRICT

MINOR CHILDREN

DALLAS COUNTY, TEXAS

RESPONDENT’S ORIGINAL ANSWER  
TO MOTION FOR ENFORCEMENT

TO SAID HONORABLE COURT:

Now comes Respondent JEFFREY DAMON YOUNGER, who files this his Original Answer to Petitioner’s Motion for Enforcement filed herein on April 06, 2018, and in support thereof would show unto the Court the following:

I.  
GENERAL DENIAL

1.01 Respondent JEFFREY DAMON YOUNGER enters a general denial and demands strict proof by a preponderance of credible evidence as to all of the allegations and assertions contained in Petitioner’s motion for enforcement, as required by law.

1.02 The order sought to be enforced is incapable of enforcement, in that it is ambiguous and is not clear and specific enough in its terms that Respondent knows what duties or obligations are required, which precludes enforcement by contempt as a matter of law.

II.  
SPECIAL EXCEPTIONS

2.01 Respondent JEFFREY DAMON YOUNGER further specially excepts to Petitioner’s Motion for Enforcement in that the Motion fails to allege with any degree of specificity the

dates, times, and places of the alleged violations as required by law. Respondent JEFFREY DAMON YOUNGER requests that the Court sustain this special exception and order the allegations be stricken, that Petitioner be ordered to amend her Motion, and that if she fails or refuses to amend, that the action be dismissed in its entirety.

2.02 Further, the Order sought to be enforced by the Motion is not specific enough to be enforceable by contempt, in that the terms contained therein are inconsistent and conflicting, and the details of compliance are not spelled out in clear, specific, and unambiguous terms, see *Ex parte Slavin*, 412 S.W.2d 43, 44 (Tex. 1967). Respondent JEFFREY DAMON YOUNGER requests that the Court sustain this special exception and order the allegations be stricken, that Petitioner be ordered to amend her Motion, and that if she fails or refuses to amend, that the action be dismissed in its entirety.

### III. PRAYER

3.01 Respondent JEFFREY DAMON YOUNGER prays that the Court sustain his Special Exceptions, that the Court deny Petitioner's Motion for Enforcement by Contempt and all relief requested therein, and that Respondent recover all attorney's fees, costs, and expenses incurred by him herein.

Respondent prays for general relief.

Respectfully submitted,

ODENEAL & ODENEAL ATTORNEYS

By 

Logan Odeneal

State Bar #00792728

4849 Greenville Avenue #1111

Dallas, Texas 75206

(214) 691-0611, Fax (214) 890-7628

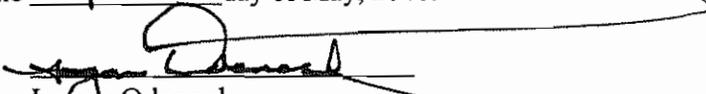
E-Mail [odeneal@sbcglobal.net](mailto:odeneal@sbcglobal.net)

**Attorneys for Respondent**

**JEFFREY DAMON YOUNGER**

CERTIFICATE OF SERVICE

Copies of the foregoing pleading were delivered to Petitioner ANNA GEORGULAS through her Attorney of Record KIM M. MEADERS, Palmer & Manuel, PLLC, 8350 North Central Expressway #1111, Dallas, Texas 75206, via E-Serve and fax (214) 891-7071, pursuant to Rule #21(a) of the Texas Rules of Civil Procedure, on this the 7<sup>th</sup> day of May, 2018.

  
Logan Odeneal