

Chris Martinez

NO. DF-15-09887-S

IN THE INTEREST OF

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IN THE DISTRICT COURT

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

255TH JUDICIAL DISTRICT

MINOR CHILDREN

DALLAS COUNTY, TEXAS

RESPONDENT'S ORIGINAL ANSWER
TO PETITION TO MODIFY

TO SAID HONORABLE COURT:

Now comes Respondent JEFFREY DAMON YOUNGER, the father and joint managing conservator of the minor children, the subject of this suit, who files this his Original Answer to the Petition to Modify Parent-Child Relationship filed herein by Petitioner ANNE GEORGULAS on April 06, 2018, and in support thereof would show unto the Court the following:

I.
PARTIES

1.01 As recited above, Respondent is the father of the minor children, the subject of this suit. The name and address of each party whose rights, privileges, duties, or powers may be affected by this suit, other than Respondent, are:

NAME: ANNE GEORGULAS
RELATIONSHIP: Mother and Joint Managing Conservator of the children.

1.02 No service of process is requested at this time as this Original Answer can be served directly upon the Petitioner's counsel of record KIM M. MEADERS, Palmer & Manuel, PLLC, Campbell Centre I, Suite #1111, 8350 N. Central Expressway, Dallas, Texas 75206. The modifications requested by Petitioner ANNE GEORGULAS, in her Petition to Modify filed

herein will clearly not be in the best interest of the children, and will in fact be detrimental to the emotional and physical wellbeing and development of the children.

II.
GENERAL DENIAL

2.01 Respondent enters a general denial and demand strict proof of any and all claims by a preponderance of credible evidence as required by law.

III.
VENUE/JURISDICTION

3.01 This Court has jurisdiction of this suit and of the children the subject of this suit because of prior proceedings, and this is currently the Court of continuing exclusive jurisdiction.

IV.
CHILDREN

4.01 The following children are the subject of this case:

NAME:	J.A.D.Y. (JAMES DAMON YOUNGER)
SEX:	Male
BIRTHDATE:	05/07/2012
BIRTHPLACE:	Dallas, Texas

NAME:	J.U.D.Y. (JUDE DANIEL YOUNGER)
SEX:	Male
BIRTHDATE:	05/07/2012
BIRTHPLACE:	Dallas, Texas

V.
CHILDREN'S PROPERTY

5.01 There has been no change in the status of the children's property since rendition of the Order sought to be modified.

VI.
CONSERVATORSHIP

6.01 The modifications to the prior Order requested by the Petitioner relating to conservatorship of the children would be ill advised, not at all in the children's best interests, and would clearly be detrimental to the children's emotional and physical well being and development, and should be denied in all respects.

VII.
REQUEST FOR TEMPORARY ORDERS

7.01 Respondent requests the Court, after notice and hearing, to dispense with the necessity of a bond and to make temporary orders and issue any appropriate temporary injunctions for the safety and welfare of the children as deemed necessary and equitable.

VIII.
ATTORNEY'S FEES AND EXPENSES

8.01 It was necessary for Respondent to secure the services of LOGAN ODENEAL, a licensed attorney, to prepare and defend this suit on his behalf and that of the minor children. In the event that this matter is contested, judgment for reasonable attorney's fees and expenses through final judgment after appeal should be granted against Petitioner and in favor of Respondent for the use and benefit of Respondent's attorney; or, in the alternative, Respondent requests that reasonable attorney's fees and expenses through final judgment after appeal be taxed as costs and be ordered paid directly to Respondent's attorney, who may enforce the order for fees in their own name.

IX.
PRAYER

9.01 WHEREFORE, ALL PREMISES DULY CONSIDERED, Respondent JEFFREY DAMON YOUNGER prays that upon notice and hearing the Court enter an order which:

- (A) Denies any and all relief sought by Petitioner;
- (B) Awards Respondent reasonable Attorney's fees and costs, including reasonable interim fees.

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

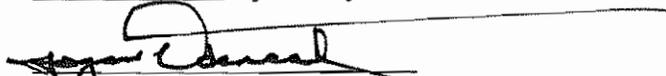
E-Mail odeneal@sbcglobal.net

Attorney 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 7th day of May, 2018.


Logan Odeneal