

CAUSE NO. 2021CCV-60554-4

LUCY ZUNIGA, INDIVIDUALLY AND	§	IN THE COUNTY COURT
VIVIAN SIMAJ-SANTOS, INDIVIDUALLY	§	
AND AS PERSONAL REPRESENTATIVE	§	
OF THE ESTATE OF JASSON JOSUE	§	
VILLALOBOS ZUNIGA	§	
	§	
V.	§	AT LAW
	§	
AMERICAN DIRECTIONAL BORING, INC.,	§	
D/B/A ADB UTILITY CONTRACTORS	§	
INC., AT&T, INC., THE KEELEY	§	
COMPANIES, S.S. CONSTRUCTION AND	§	
DRILLING, LLC	§	NUECES COUNTY, TEXAS

**DEFENDANT, AMERICAN DIRECTIONAL BORING INC. D/B/A ADB UTILITY
CONTRACTORS, INC.'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, AMERICAN DIRECTIONAL BORING INC. D/B/A ADB UTILITY CONTRACTORS, INC., Defendant in the above-referenced and entitled cause, and files this, its Original Answer to Plaintiff's Original Petition, and would show unto this Honorable Court as follows:

I.
GENERAL DENIAL

Pursuant to the provisions of Rule 92 of the Texas Rules of Civil Procedure, Defendant, AMERICAN DIRECTIONAL BORING INC. D/B/A ADB UTILITY CONTRACTORS, INC., denies each and every, all and singular, the allegations contained in Plaintiff's Original Petition, and demands strict proof thereof.

WHEREFORE, PREMISES CONSIDERED, Defendant, AMERICAN DIRECTIONAL BORING INC. D/B/A ADB UTILITY CONTRACTORS, INC., prays that

Plaintiff takes nothing by reason of this suit herein and that Defendant has judgment in its favor on all issues of law and fact, and that Defendant recovers its costs expended herein, and for such other and further relief, general or special, at equity or in law, to which this Defendant may be justly entitled.

Respectfully submitted,

/s/ *Wade R. Quinn*

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AMERICAN DIRECTIONAL BORING INC.
D/B/A ADB UTILITY CONTRACTORS, INC.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument was served upon the parties listed below by facsimile, certified mail, return receipt requested, first class U.S. mail, electronic mail by the clerk of the court, and/or by messenger on the 4th day of June, 2021.

/s/ *Wade R. Quinn*

Wade R. Quinn

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