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#### CAUSE NO. DC-13-05900

CAUSE NO	O. DC-13-	05900 13AUG 15 ED
LISAMARIE ANTONICELLI,	§	IN THE DISTRICT COURT OF
Plaintiff,	§	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
_	§	
v.	8	2094 HUDICIAI DISTRICT
DOV IODCENSEN ASSOCIATES INC.	8	298th JUDICIAL DISTRICT
ROY JORGENSEN ASSOCIATES, INC.;	8	,
INFRASTRUCTURE CORPORATION	§	
OF AMERICA; ICA MAINTENANCE,	§	
INC.; TRINITY INDUSTRIES, INC.; and	§	
TRINITY HIGHWAY PRODUCTS, LLC	§	
Defendants.	8	DALLAS COUNTY, TEXAS

## ORIGINAL ANSWER OF DEFENDANTS INFRASTRUCTURE CORPORATION OF AMERICA AND ICA MAINTENANCE, INC. AND REQUEST FOR DISCLOSURE

#### TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Infrastructure Corporation of America and ICA Maintenance, Inc., Defendants in the above-entitled and numbered cause, and file this their Original Answer to Plaintiff's Original Petition, and in support thereof would respectfully show the Court as follows:

# **GENERAL DENIAL**

Defendants generally deny each and every allegation contained in Plaintiff's Original Petition and demand strict proof thereof by preponderance of the credible evidence.

# REQUEST FOR DISCLOSURE

Pursuant to Tex. R. Civ. P. 194, Defendants request the Plaintiff to disclose, within thirty (30) days of service of this request, the information and materials described in Tex. R. Civ. P. 194.2.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that Plaintiff take nothing by her suit, that Defendants be dismissed, and that Defendants recover all further relief to which Defendants may be justly entitled at law or in equity.

ORIGINAL ANSWER OF DEFENDANTS INFRASTRUCTURE CORPORATION OF AMERICA AND ICA MAINTENANCE, INC. AND REQUEST FOR DISCLOSURE - Page 1

Respectfully submitted,

By:

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ATTORNEYS FOR DEFENDANT INFRASTRUCTURE CORPORATION OF AMERICA AND ICA MAINTENANCE, INC.

## CERTIFICATE OF SERVICE

I hereby certify that on this 15 day of AUGUST, 2013, a true and correct copy of the foregoing document was delivered to the counsel of record as listed below.

#### **Via Facsimile: 940-627-8092**

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August 15, 2013

Clerk of the 298th Civil District Court George L. Allen, Sr. Courts Bldg. 600 Commerce St., 8<sup>th</sup> Floor New Tower Dallas, TX 75202-6143

Re: Cause No. DC-13-05900

Lisamarie Antonicelli vs. Roy Jorgensen Associates, Inc.; Infrastructure Corporation of America; ICA Maintenance, Inc.; Trinity Industries, Inc.; and Trinity Highway Products, LLC; In the

298<sup>th</sup> District Court; Dallas County, Texas

Our File No. 59970869

Dear Sir or Madam:

Enclosed please find the original and one copy of the Original Answer of Defendant Infrastructure of America and Request for Disclosure in connection with the above-referenced matter. Please file the original and return a file-marked copy via our courier.

By copy of this correspondence we are providing a copy of the above document to all known counsel of record.

Thank you for your assistance in this matter.

Very truly yours

Patrick N. Jackson

PNJ:cf Enclosure

cc: Theodore Anderson (w/encl.) – Via Fax: 214-953-0133

Kirk D. Willis (w/encl.) – Via Fax: 214-736-9994 Russell C. Brown (w/encl.) – Via Fax: 903-657-6003

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