

CAUSE NO. 017-352358-24

AFG COMPANIES, INC.,	§	IN THE DISTRICT COURT
Plaintiff	§	
	§	
v.	§	17 <sup>th</sup> JUDICIAL DISTRICT
	§	
GENUINE LIFETIME, LLC and	§	
TYLER J. LUCK,	§	
Defendants	§	TARRANT COUNTY, TEXAS

**DEFENDANT TYLER J. LUCK'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF THE COURT:

Defendant Tyler J. Luck (“Defendant Luck”) files his Original Answer in response to Plaintiff’s Original Petition. In support thereof, Defendant Luck would show the Court the following:

**I.**  
**GENERAL DENIAL**

1.01 Pursuant to Rule 92 of the TEXAS RULES OF CIVIL PROCEDURE, Defendant Luck exercises his rights under the law whereby he may file a general denial and require Plaintiff to prove its causes of action by a preponderance of the evidence. Defendant Luck therefore denies generally each and every, all and singular, of the material allegations contained in Plaintiff’s Original Petition, and all subsequent petitions, and inasmuch as said allegations are questions of fact, Defendant Luck demands strict proof thereof by a preponderance of the evidence, if Plaintiff can do so. Defendant Luck requires Plaintiff to prove its causes of action to a fair and impartial trier of fact, if it can do so.

**II.**  
**RULE 193.7 NOTICE**

2.01 Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Defendant Luck hereby gives notice to all parties that he intends to use all documents produced in response to written discovery in any pre-trial hearing and at trial.

**RELIEF REQUESTED**

WHEREFORE, PREMISES CONSIDERED, Defendant Tyler J. Luck respectfully requests that, upon final hearing herein, Plaintiff recover nothing from him; that he shall have judgment in his favor; that all costs be taxed against Plaintiff; and for such other and further relief, at law or in equity, to which he may be justly entitled.

Respectfully submitted,

/s/ Levi McCathern  
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GENUINE LIFETIME, LLC

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of *Defendant Tyler J. Luck's Original Answer* was e-served on all counsel of record in accordance with the Texas Rules of Civil Procedure.

\_\_\_\_\_  
*/s/ Levi McCathern*  
Levi G. McCathern, II

## Automated Certificate of eService

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Elizabeth Criswell on behalf of Levi McCathern

Bar No. 00787990

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Filing Code Description: Answer/Response

Filing Description: Defendant Tyler J. Luck's Original Answer

Status as of 6/13/2024 2:15 PM CST

Associated Case Party: THEGENUINE LIFETIME LLC

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