

CAUSE NO: 493-09412-2025

**TOM PLUNKETT**  
*Plaintif,*

§  
§  
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§

**IN THE DISTRICT COURT**

v.

**493rd JUDICIAL DISTRICT**

**FREDERICK FRAZIER,**  
*Defendant,*

**COLLIN COUNTY, TEXAS**

**ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES FREDERICK FRAZIER, in the above-entitled and numbered cause, and files this Original Answer, and in support thereof, would respectfully show unto the Court as follows:

I.

**GENERAL DENIAL**

Fred both deny each and every, all and singular, the allegations contained in the Plaintiff's Original Petition filed by TOM PLUNKETT, and enters this general denial pursuant to Rule 92 of the Texas Rules of Civil Procedure.

WHEREFORE, PREMISES CONSIDERED, FREDERICK FRAZIER prays that the Court deny all relief sought by Plaintiff, award reasonable and necessary attorneys' fees and expenses to FREDERICK FRAZIER, and have such other and further relief, at law or in equity, general or special, to which he may show themselves justly entitled.

Respectfully submitted,

STAUBUS & RANDALL, L.L.P.

By:           /s/ Joseph E. Legere

JOSEPH E. LEGERE

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**ATTORNEY FOR FREDERICK FRAZIER**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument was served upon all counsel of record, via e-service, on this 8<sup>th</sup> day of January, 2026.

/s/ Joseph E. Legere  
JOSEPH E. LEGERE

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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