

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re <u>CFO Management Holdings, LLC</u>	§	Case No. <u>19-40426</u>
Debtor	§	
	§	
Davis Wallace, as Chapter 11 Trustee for the	§	Chapter <u>11</u>
Bankruptcy Estate of CFO Management	§	
<u>Holdings, LLC</u>	§	
Plaintiff	§	
	§	
v.	§	Adv. Proc. No. <u>21-04029</u>
	§	
George/McKenna Electrical	§	
<u>Contractors, Inc.</u>	§	
Defendant	§	
	§	

**DEFENDANT GEORGE-MCKENNA ELECTRICAL CONTRACTORS INC.'S
ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL COMPLAINT**

COMES NOW, DEFENDANT GEORGE-MCKENNA ELECTRICAL CONTRACTORS, INC. and files this its Original Answer to *Plaintiff's Original Complaint* ("the Complaint"), and in support hereof would respectfully show the Court the following:

ANSWER TO SPECIFIC ALLEGATIONS

Defendant answers each of the numbered paragraphs of the Complaint as follows:

1. Defendant admits the allegations contained in Paragraph 1 of Plaintiff's Complaint.
2. Defendant admits the allegations in Paragraph 2 of Plaintiff's Complaint.
3. Defendant admits that this Court has jurisdiction of this matter and that venue is

proper in this district. Defendant is without sufficient knowledge or information to admit or deny the



remaining allegations contained in Paragraph 3 of Plaintiff's Complaint; therefore, such allegations are denied.

4. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 4 of Plaintiff's Complaint; therefore, such allegations are denied.

5. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 5 of Plaintiff's Complaint; therefore, such allegations are denied.

6. Defendant admits the allegations in Paragraph 6 of Plaintiff's Complaint.

7. Defendant is not required to admit or deny the allegations in Paragraph 7 of Plaintiff's Complaint.

8. The allegations of Paragraph 8 of Plaintiff's Complaint contains material misstatements of the effect of Texas Mechanic's and Materialmen's Lien laws and are therefore denied.

9. Defendant denies the allegations in Paragraph 9 of Plaintiff's Complaint.

10. The allegations of Paragraph 10 of Plaintiff's Complaint rely upon material mischaracterization of Texas Mechanic's and Materialmen's Lien laws and are denied.

11. Defendant denies the allegations contained in Paragraph 11 of Plaintiff's Complaint.

12. Defendant denies the allegations in Paragraph 12 of Plaintiff's Complaint.

13. Defendant denies the allegations in Paragraph 13 of Plaintiff's Complaint.

14. Paragraph 14 does not require denial or admittance.

15. Defendant denies the allegations contained in Paragraph 15 of Plaintiff's Complaint.

16. Defendant denies the allegations contained in Paragraph 16 of Plaintiff's Complaint, and further denies that Plaintiff is entitled to the relief requested in Paragraph 16.

17. Paragraph 17 does not require denial or admittance.
18. Defendant denies that Plaintiff is entitled to the relief requested in Paragraph 18.
19. Paragraph 19 does not require denial or admittance.
20. Defendant admits the allegations contained in Paragraph 20.
21. Defendant denies the allegations contained in Paragraph 21, and further denies that Plaintiff is entitled to the relief sought.

Respectfully submitted,

CUTLER ■ SMITH, P.C.

By: /s/ Garrin Fant
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***ATTORNEYS FOR DEFENDANT GEORGE -
MCKENNA ELECTRICAL CONTRACTORS, INC.***

CERTIFICATE OF SERVICE

This is to certify that on this _____ day of March, a true and correct copy of the foregoing was served on counsel of record for Plaintiff in accordance with the Federal Rules of Civil Procedure.

/s/ Garrin Fant
Attorney Certifying