

**NO. 233-765358-25**

**IN THE INTEREST OF**

**M [REDACTED] M [REDACTED] AND C [REDACTED]  
M [REDACTED],**

**CHILDREN**

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**§**

**IN THE DISTRICT COURT**

**233RD JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RESPONDENT'S ORIGINAL ANSWER**

MORGAN MYERS, Respondent, files this original answer. Respondent has not been issued a driver's license. Respondent has not been issued a Social Security number.

*Preservation of Evidence:* Petitioner is put on notice to preserve and not destroy, conceal, or alter any evidence or potential evidence relevant to the issues in this case, including tangible documents or items in Petitioner's possession or subject to Petitioner's control and electronic documents, files, or other data generated by or stored on Petitioner's home computer, work computer, storage media, portable systems, electronic devices, online repositories, or cell phone.

*1. Information about Children*

Information required by section 154.181(b) and section 154.1815 of the Texas Family Code will be provided at a later date.

*2. Denial of Allegations*

Respondent enters a general denial.

*3. Verified Defense*

There is another suit pending in Texas between the same parties involving the same claim. That suit is Cause No. 322-744263-23, pending in TARRANT County, Texas, styled "In the Matter of the Marriage of Morgan Myers and Charles Myers And In the Interest Of M [REDACTED]"

M[REDACTED] and C[REDACTED] M[REDACTED], Children.

4. *Attorney's Fees, Expenses, Costs, and Interest*

It was necessary for Respondent to secure the services of COOPER L. CARTER, a licensed attorney, to prepare and defend this suit. Petitioner's suit was filed frivolously or is designed to harass Respondent.

If the parties are unable to reach an agreement on all issues, Petitioner, CHARLES MYERS, should be ordered to pay reasonable attorney's fees, expenses, and costs through trial and appeal, and a judgment should be rendered in favor of this attorney and against Petitioner and be ordered paid directly to Respondent's attorney, who may enforce the judgment in the attorney's own name. Respondent requests postjudgment interest as allowed by law.

5. *Prayer*

Respondent prays that all relief prayed for by Petitioner be denied and that Respondent be granted all relief requested in this answer.

Respondent prays for attorney's fees, expenses, and costs as requested above.

Respondent prays for general relief.

MARX ALTMAN & JOHNSON  
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By: /s/ Cooper L. Carter  
COOPER L. CARTER  
State Bar No. 24121530  
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Attorney for Respondent

### **Certificate of Service**

I certify that a true copy of this Respondent's Original Answer was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on March 20, 2025:

Charles Myers by electronic filing manager.

/s/ Cooper L. Carter

COOPER L. CARTER  
Attorney for Respondent