{{p include\_docx\_template('docassemble.us\_tx\_family:data/templates/TX-001.001-Basic\_Pleading.docx')}}

Respondent, {{case.respondent}}, files this Original Answer to Petitioner {{case.petitioner}}’s {{case.original\_pleading\_name}}.

{% if case.respondent[0].ssn %}The last three digits of Respondent’s Social Security number are {{case.respondent[0].ssn[-3:]}}{%else%}Respondent does not have a Social Security Number{%endif%}. {% if case.respondent[0].dl\_number %}The last three digits of Respondent’s {{case.respondent[0].dl\_state}} driver’s license number are {{case.respondent[0].dl\_number[-3:]}}{%else%}Respondent does not have a driver’s license{%endif%}.

**GENERAL DENIAL**

1. Respondent generally denies the allegations in Petitioner’s {{case.original\_pleading\_name}}.

**{%p if case.affirmative\_def\_possession%}**

**AFFIRMATIVE DEFENSES – POSSESSION AND ACCESS**

1. xPetitioner voluntarily relinquished actual possession and control of the child.{%p endif %}

**{%p if case.affirmative\_def\_support%}**

**AFFIRMATIVE DEFENSES – CHILD SUPPORT**

1. zPetitioner voluntarily relinquished actual possession and control of the child.
2. Respondent lacked the ability to provide support in the amount ordered; lacked property that could be sold, mortgaged, or otherwise pledged to raise the funds needed; attempted unsuccessfully to borrow the funds needed; and knew of no source from which the money could have been borrowed or legally obtained.{%p endif%}

**{%p if case.cs\_enf\_counterclaim%}**

**COUNTERCLAIM/OFFSET**

1. Respondent asserts a counterclaim or offset against the claim of the obligee because Respondent provided actual support to the child during the time subject to an affirmative defense under Section 157.008 of the Texas Family Code.{%p endif %}

**{%p if case.object\_aj %}**

**OBJECTION TO ASSCIATE JUDGE**

1. Respondent objects to an associate judge hearing a trial on the merits or presiding at a jury trial in this case.{%p endif %}

**ATTORNEY FEES**

1. It was necessary for Respondent to retain the services of {{case.me.name}}, a licensed attorney, to prepare and defend this suit. Judgment for reasonable attorney’s fees and expenses through trial and appeal should be granted against Petitioner and in favor of {{case.me.name}}. The judgment, along with postjudgment interest, should be ordered paid directly to said attorney, who may enforce the judgment in said attorney’s own name.

**REQUEST FOR DISCLOSURE**

1. Under Texas Rule of Civil Procedure 194, Respondent requests that Petitioner disclose, within 30 days after service of this request, the information or material described in Rule 194.2(b)-(f), (h), and (i).

**PRAYER**

1. For these reasons, Respondent asks the Court to deny Petitioner’s requests for relief and award all other relief to which Respondent is entitled.

{{p include\_docx\_template('docassemble.us\_tx\_family:data/templates/TX-001.002-Signature\_Line.docx')}}

{{p include\_docx\_template('docassemble.us\_tx\_family:data/templates/TX-001.003-Certificate\_of\_Service.docx')}}