

CAUSE NO. 2011-CI-02000

CAROLYN J. CLARK, AS EXECUTRIX	§	IN THE DISTRICT COURT
OF THE ESTATE OF PATRICIA BURNS	§	
CLARK, AND CAROLYN J. CLARK,	§	
MICHELE DAILEY CADWALLADER AND	§	
CHRISTOPHER CLARK, INDIVIDUALLY	§	
Plaintiffs,	§	
	§	
v.	§	438 TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.,	§	
INDIVIDUALLY AND IN ITS CAPACITY	§	
AS TRUSTEE FOR THE PATRICIA BURNS	§	
CLARK TESTAMENTARY TRUST AND	§	
THE PATRICIA BURNS CLARK	§	
IRREVOCABLE TRUST, and	§	
PATRICIA SHULTZ-ORMOND,	§	
Defendants	§	BEXAR COUNTY, TEXAS

DEFENDANTS' FIRST AMENDED ANSWER

Defendants JPMorgan Chase Bank, N.A., Individually and in its Capacity as Trustee of the Patricia Burns Clark Testamentary Trust and the Patricia Burns Clark Irrevocable Trust and Patricia Schultz-Ormond (“Defendants”), file this First Amended Answer to the Plaintiffs’ Second Amended Petition as follows:

I.

Defendants deny generally the allegations of the Plaintiffs’ Second Amended Petition and demand strict proof thereof.

II.

Defendants seek reimbursement and recovery of their reasonable and necessary attorneys’ fees and costs as may be equitable and just under Tex. Prop. Code §114.064.

WHEREFORE, Defendants pray that Plaintiffs take nothing by this suit, and that, upon final trial, Defendants recover their attorneys fees, costs, costs of court, and such other and further relief to which they may be entitled.

REQUEST FOR DISCLOSURE

Pursuant to TEX. R. CIV. P. 194, Defendants request that Plaintiffs disclose the information or material described in TEX. R. CIV. P. 194.2(a)-(l).

Respectfully submitted,

**HORNBERGER FULLER SHEEHAN
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document was served on the following counsel of record via Electronic Service this 27th day of October, 2011:

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