

5. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 5 and therefore denies it.

6. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 6 and therefore denies it.

7. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 7 and therefore denies it.

8. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 8 and therefore denies it.

9. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 9 and therefore denies it.

10. Surety admits the allegations of paragraph 10.

11. Surety admits the allegations of paragraph 11.

12. Surety admits the allegations of paragraph 12.

13. Surety admits the allegations of paragraph 13.

14. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 14 and therefore denies it.

15. Surety admits the allegations of paragraph 15.

16. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 16 and therefore denies it.

17. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 17 and therefore denies it.

18. Surety admits the allegations of paragraph 18.

19. Surety admits the allegations of paragraph 19.

20. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 20 and therefore denies it.

21. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 21 and therefore denies it.

22. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 22 and therefore denies it.

23. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 23 and therefore denies it.

24. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 24 and therefore denies it.

25. Surety admits that it was known as Unlimited Bond Source but denies the remaining averments of the first and second sentence of paragraph 25. Surety denies the last sentence of paragraph 25.

26. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 26 and therefore denies it.

27. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 27 and therefore denies it

28. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of the first part of the first sentence of paragraph 28 and therefore denies it. Surety admits the remaining averments of paragraph 28 in the second half of the first sentence and in the second sentence.

29. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 29 and therefore denies it.

30. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 30 and therefore denies it.

31. Paragraph 31 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 30, they are again denied.

32. Surety denies the averments of paragraph 32.

33. Paragraph 33 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 32, they are again denied.

34. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 34 and therefore denies it.

35. Surety denies the averments of paragraph 35.

36. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 36 and therefore denies it.

37. Surety denies the averments of paragraph 37.

38. Paragraph 38 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 37, they are again denied.

39. Surety denies the averments of paragraph 39.

40. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 40 and therefore denies it.

41. Paragraph 41 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 40, they are again denied..

42. Surety denies the averments of paragraph 42.

43. Paragraph 43 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 42, they are again denied.

44. Surety denies the averments of paragraph 44.

45. Paragraph 45 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 44, they are again denied.

46. Surety denies the averments of paragraph 46.

47. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 47 and therefore denies it.

48. Paragraph 48 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 47, they are again denied.

49. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 49 and therefore denies it.

50. Paragraph 50 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 49, they are again denied.

51. Surety is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 51 and therefore denies it.

52. Paragraph 52 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 51, they are again denied.

53. Surety denies the averments of paragraph 53.

54. Surety denies the averments of paragraph 54.

55. Paragraph 55 does not require additional response, but to the extent that Surety has denied the averments in paragraphs 1 through 54, they are again denied.

56. Surety denies the averments of paragraph 56.

II. DEFENSES

1. Surety asserts that Plaintiff is barred from recovery due to estoppel.

WHEREFORE, PREMISES CONSIDERED, Surety Marketing Source, LLC prays that the Court render a take-nothing judgment against Plaintiff, that the Court assess costs against Plaintiff and award Surety all other relief to which it is justly entitled.

Respectfully submitted,

/s/ Kimberly Sims

BRUCE K. PACKARD

State Bar No. 15402300

THEODORE J. RINEY

State Bar No. 16935075

KIMBERLY M.J. SIMS

State Bar No. 24046167

RINEY PALTER PLLC

5949 Sherry Lane, Suite 1616

Dallas, TX 75225 - 8009

Telephone: (214) 461-1200

Facsimile: (214) 461-1210

**ATTORNEYS FOR SURETY
MARKETING SOURCE, LLC**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument was served upon the following on this 30th day of April, 2007.

Michael J. Quilling
Brent Jason Rodine
Quilling Selander Cummiskey & Lownds
2001 Bryan St
Suite 1800
Dallas, Texas 75201

Bruce S. Kramer
Borod & Kramer
Brinkley Plaza
80 Monroe Suite G-1
Memphis, Tennessee 38103

/s/ Kimberly Sims

KIMBERLY M.J. SIMS