


AFFIRMATIVE DEFENSES

2. Defendants allege affirmatively that this Court does not have in personam jurisdiction over them.
3. These Defendants would affirmatively show that venue of this action is improper in this Court.

PRAYER FOR RELIEF

WHEREFORE, Defendants pray that Plaintiff take nothing by their action and that Defendants receive other relief to which they are justly entitled.

Respectfully submitted,



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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of September 2005, a true and correct copy of the above and foregoing instrument was served on all counsel of record in accordance with Rule 5(b) of the FEDERAL RULES OF CIVIL PROCEDURE by the mean set forth herein.

Michael J. Quilling, Esq.
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2001 Bryan Street, Suite 1800
Dallas, Texas 75201-4240

Via certified mail, return receipt requested
No. 7160 3901 9848 7262 5800
and facsimile 214 871-2111



BRUCE W. CLAYCOMBE