

CAUSE NO. DC-25-09345

BRIAN MORROW, ET. AL,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
v.	§	DALLAS COUNTY, TEXAS
	§	
RANDY SCHACKMANN, ET. AL,	§	
	§	
Defendants.	§	95TH JUDICIAL DISTRICT

**DEFENDANTS' ANSWER IN RESPONSE TO PLAINTIFFS' FIRST AMENDED
PETITION FOR INJUNCTIVE RELIEF**

Defendants Randy Schackmann, Nancy Brady, Cassandra Hatfield, Ileana Garza-Rojas, and Marjorie Barnes (collectively, the Defendant Trustees) file their Answer in Response to Plaintiffs' First Amended Petition for Injunctive Relief and, in support thereof, would respectfully show the Court as follows:

I. DEFENDANTS' ANSWER

Pursuant to Texas Rules of Civil Procedure 92, Defendants deny each and every allegation contained in Plaintiffs' First Amended Petition for Injunctive Relief and deny that Plaintiffs are entitled to injunctive, declaratory, or any other relief demanded in their Petition and demand strict proof thereof.

II. AFFIRMATIVE DEFENSES

Pursuant to Texas Rule of Civil Procedure 94, Defendants assert the affirmative defenses of laches and unclean hands. Defendants reserve the right to assert any and all affirmative defenses available and revealed through discovery in this matter. Defendants have not knowingly or intentionally waived any affirmative defenses. Defendants reserve the right to supplement and/or amend their Answer and additionally reserve the right to assert any claims, counter claims, cross

claims, third party claims, and/or additional defenses it may have based upon further investigation and discovery in this matter.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that this Court deny Plaintiffs' First Amended Petition for Injunctive Relief and all relief demanded therein. Defendants seek any and all relief to which they may be justly entitled, including attorneys' fees and costs of court.

Respectfully submitted,

By: /s/Meredith Prykryl Walker
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document was served upon the following counsel of record in a manner authorized by and in accordance with the Texas Rules of Civil Procedure on September 25, 2025.

Brian T. Morrow
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/s/ Meredith Prykryl Walker
Meredith Prykryl Walker

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