

EXHIBIT C

CERTIFIED FILE FROM HARRIS COUNTY DISTRICT CLERK

2020-20934

COURT: 190th

FILED DATE: 4/2/2020

CASE TYPE: OTHER CIVIL



SEAN BOUTROS M D P A

Attorney: LUFF, PATRICK ALLEN

VS.

SENTINEL INSURANCE CO LTD (D/B/A THE HARTFORD)

Docket Sheet Entries

Date	Comment
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CAUSE NO. _____

Sean Boutros, M.D., P.A.,
Plaintiff

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IN THE DISTRICT COURT OF

v.

HARRIS COUNTY, TEXAS

Sentinel Insurance Co., Ltd. d/b/a The Hartford,
and Alliant Insurance Services Houston, LLC
Defendants

_____ JUDICIAL DISTRICT

PLAINTIFF’S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF THIS COURT:

Sean Boutros, M.D., P.A., Plaintiff in the above-reference cause of action, complaining of Sentinel Insurance Co., Ltd. d/b/a The Hartford, and Alliant Insurance Services, LLC, Defendants, files this Original Petition and Request for Disclosure, and would respectfully show as follows:

DISCOVERY CONTROL PLAN

1. Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, Plaintiff will proceed with discovery under a Level 3 Discovery Control Plan.

PARTIES

2. Plaintiff Sean Boutros, M.D., P.A. is a professional association registered in the State of Texas and doing business in Harris County, Texas.

3. Defendant Sentinel Insurance Co., Ltd. d/b/a The Hartford (“Hartford”), is a foreign-for-profit insurance company licensed to do business in the State of Texas with its principal place of business at One Hartford Plaza, Hartford, CT 06155-0001. Hartford can be served with process through its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136. Defendant Sentinel Insurance Co., Ltd. d/b/a The Hartford is sued in its assumed or common name under Rule 28 of the Texas Rules of Civil Procedure and includes suit against any and all partnerships, unincorporated associations, private corporations, and

individuals doing business under the name The Hartford. Service of process on Defendant Sentinel Insurance Co., Ltd. is effected service on The Hartford in its common name.

4. Defendant Alliant Insurance Services Houston, LLC, (“Alliant”) is a foreign-for-profit insurance company licensed to do business in the State of Texas with its principal place of business at 5847 San Felipe, Suite 2750, Houston, Texas 77057. Alliant can be served with process through its registered agent, Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this action under TEX. GOV’T CODE § 24.007(b) because it is a civil suit with an amount in controversy exceeding the jurisdictional limits.

6. Venue is proper in Harris County, Texas under TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1) because it is the county in which all or a substantial part of the events or omissions giving rise to this suit occurred. Venue is also proper in Harris County, Texas under TEX. CIV. PRAC. & REM. CODE § 15.002(a)(3) because it is the county in which Defendant Alliant has its principal office in this state. Venue is also proper in Harris County, Texas under TEX. CIV. PRAC. & REM. CODE § 15.032 because it is the county in which the loss claimed occurred or in which the policyholder or beneficiary resided at the time the cause of action accrued.

7. As required by TEX. R. CIV. P. 47, Plaintiff’s counsel states that Plaintiff seeks monetary relief of \$100,000 or less and non-monetary relief.

FACTS

8. On or about June 26, 2019, Defendant Hartford and its agent, Defendant Alliant, entered into a contract of insurance with Plaintiff, in which Defendant Hartford promised to indemnify Plaintiff for certain risks, including losses of business income and losses incurred as a

result of orders of a civil authority, Policy No. 83SBAIV5585SA (“the Insurance Contract”). The Insurance Contract, which provides business personal property, business income and extra expense, civil authority, and additional coverages, is currently in full effect.

9. The entire nation is presently affected by an outbreak of COVID-19, a highly contagious and deadly virus that can stay on physical property for several days. In addition, COVID-19 can be spread by individuals showing no or only minor symptoms.

10. On March 11, 2020, Harris County Judge Lina Hidalgo issued an order in accordance with TEX. GOV’T CODE § 418.108 declaring a local disaster and public health emergency.

11. On March 19, 2020, the Texas Commissioner of the Department of State Health Services, John Hellerstedt, M.D., issued a public health disaster declaration.

12. Also on March 19, 2020, Texas Governor Greg Abbott issued an executive order postponing all non-essential surgeries and healthcare procedures.

13. In addition, on March 24, 2020, Harris County Judge Lina Hidalgo issued an order in accordance with TEX. GOV’T CODE § 418.108 requiring all individuals to stay at their place of residence except to engage in certain defined essential activities. All businesses except for those defined as essential businesses were ordered to cease all activities at facilities located in Harris County.

14. In her March 24, 2020, order, Judge Hidalgo declared that coronavirus “causes property loss or damage due to its ability to attach to surfaces for prolonged periods of time.”

15. The Centers for Disease Control and Prevention also currently recommends that any elective-provider visits and elective or non-urgent admissions, surgeries, or procedural cases be postponed in order to (1) ensure that essential healthcare facilities have adequate access to staff,

personal protective equipment, and supplies, and (2) ensure staff and patient safety.

16. Defendant Hartford and its agent, Defendant Alliant, have accepted Plaintiff's policy premiums with no intention of providing any coverage under the Insurance Contract related to a viral outbreak like the COVID-19 outbreak or the governmental orders described above.

17. As a result of COVID-19 and the governmental orders described above, Plaintiff has incurred substantial losses, which are covered under the Insurance Contract.

18. Defendant Hartford and its agents have questioned or denied coverage under the Insurance Contract that is the subject of this suit and similar contracts.

REQUEST FOR DECLARATORY JUDGMENT

19. Pursuant to Chapter 37, Texas Civil Practice & Remedies Code, Plaintiff seeks a declaratory judgment construing the Insurance Contract and declaring that Defendant Hartford and its agent, Defendant Alliant, owe Plaintiff a duty to indemnify Plaintiff for the losses it has incurred as described herein.

RESERVATION OF RIGHTS

20. These allegations against Defendants are made acknowledging that this lawsuit is still in its early stages, and investigation and discovery, although undertaken, are continuing.

21. As further investigation and discovery are conducted, additional facts will surely be uncovered that may and probably will necessitate further, additional, or different allegations, including the potential of adding parties to the case or dismissing parties from the case. The right to do so under Texas law is expressly reserved.

REQUEST FOR DISCLOSURE

22. Pursuant to TEX. R. CIV. P. 194, Defendants are each requested to disclose within the time period set forth in TEX. R. CIV. P. 194.3 the information or material described in TEX. R.

CIV. P. 194.2(a)–194.2(l).

RULE 193.7 NOTICE

23. Pursuant to TEX. R. CIV. P. 193.7, Plaintiff hereby gives actual notice to each party that any and all documents produced may be used against the party producing the document at any pretrial proceeding or at the trial of this matter without the necessity of authenticating the documents.

ATTORNEY'S FEES

24. Pursuant to TEX CIV. PRAC. & REM. CODE § 37.009, Plaintiff requests all costs and reasonable and necessary attorneys' fees incurred by Plaintiff, including all fees necessary in the event of an appeal of this cause.

JURY DEMAND

25. Pursuant to TEX. R. CIV. P. 216, Plaintiff respectfully requests and demands a trial by jury. The appropriate jury fee is tendered with the filing of this pleading.

PRAYER

WHEREFORE, Plaintiff respectfully requests:

- a. That Defendants be cited to appear and answer herein;
- b. Declaratory Judgment as set forth above;
- c. Attorneys' fees;
- d. Costs of court; and
- e. Such other and further relief, at law or in equity, to which Plaintiff may by this pleading or proper amendment thereto show itself justly entitled.

Respectfully submitted,

THE AMMONS LAW FIRM, LLP

/s/ Patrick A. Luff

Robert E. Ammons

Texas Bar No. 01159820

Patrick A. Luff

Texas Bar No. 24092728

3700 Montrose Blvd.

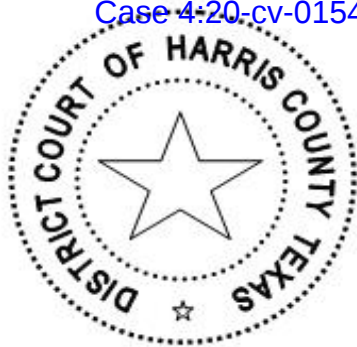
Houston, Texas 77006

Telephone: (713) 523-1606

Facsimile: (713) 523-4159

Email: rob@ammonsllaw.com

Email: patrick.luff@ammonsllaw.com



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90124434 Total Pages: 6

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com



Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

Request for Issuance of Service

CASE NUMBER: 2020-20934 CURRENT COURT: 190th

Name(s) of Documents to be served: Plaintiff's Original Petition and Request for Disclosure

FILE DATE: 4/2/20 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Sentinel Insurance Co., Ltd. d/b/a The Hartford

Address of Service: 1999 Bryan Street, Suite 900

City, State & Zip: Dallas, Texas 75201-3136

Agent (if applicable) CT Corporation System

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- Citation Citation by Posting Citation by Publication Citations Rule 106 Service
- Citation Scire Facias Newspaper _____
- Temporary Restraining Order Precept Notice
- Protective Order
- Secretary of State Citation (\$12.00) Capias (not by E-Issuance) Attachment (not by E-Issuance)
- Certiorari Highway Commission (\$12.00)
- Commissioner of Insurance (\$12.00) Hague Convention (\$16.00) Garnishment
- Habeas Corpus (not by E-Issuance) Injunction Sequestration
- Subpoena
- Other (Please Describe) _____

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

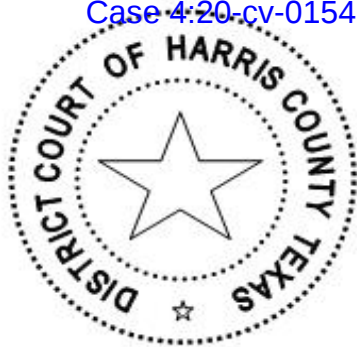
- ATTORNEY PICK-UP (phone) _____
- MAIL to attorney at: _____
- CONSTABLE
- CERTIFIED MAIL by District Clerk
- E-Issuance by District Clerk
(No Service Copy Fees Charged)
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.
Visit www.hcdistrictclerk.com for more instructions.*
- CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
- OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Patrick Luff Bar # or ID 01159820

Mailing Address: 3700 Montrose Blvd., Houston, TX 77006

Phone Number: (713) 523-1606

Certified Document Number: 90127886 - Page 1 of 1



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90127886 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2020-20934

SEAN BOUTROS M.D., P.A.
PLAINTIFF

VS.

SENTINEL INSURANCE CO LTD D/B/A THE
 HARTFORD, ET AL
DEFENDANT

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IN THE 190th District Court

HARRIS COUNTY, TX

RETURN OF SERVICE

ON Friday, April 3, 2020 AT 11:10 AM

CITATION, PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE for service on SENTINEL INSURANCE CO LTD (DBA THE HARTFORD) C/O REGISTERED AGENT CT CORPORATION SYSTEM came to hand.

ON Friday, April 3, 2020 AT 1:09 PM, I, Don Anderson, PERSONALLY DELIVERED THE ABOVE-NAMED DOCUMENTS TO: SENTINEL INSURANCE CO LTD (DBA THE HARTFORD) C/O REGISTERED AGENT CT CORPORATION SYSTEM, by delivering to Terri Thongsavat intake specialist, 1999 BRYAN STREET SUITE 900, DALLAS, DALLAS COUNTY, TX 75201.

My name is Don Anderson. My address is 1900 Brown, BALCH SPRINGS, TX 75180. I am a private process server certified by the Texas Judicial Branch Certification Commission (PSC 4232, expires 8/31/2020). My e-mail address is info@easy-serve.com. My date of birth is 7/14/1956. I am in all ways competent to make this statement, and this statement is based on personal knowledge. I am not a party to this case and have no interest in its outcome. I declare under penalty of perjury that the foregoing is true and correct.

Executed in DALLAS COUNTY, TX on Friday, April 3, 2020.

/S/ Don Anderson

Boutros #20061

Doc ID: 272365_1

EML

Receipt Number: 851447

Tracking Number: 73740376

COPY OF PLEADING PROVIDED BY PLT

CAUSE NUMBER: 202020934

PLAINTIFF: SEAN BOUTROS M D P A

In the 190th Judicial

vs.

District Court of

DEFENDANT: SENTINEL INSURANCE CO LTD (D/B/A THE HARTFORD)

Harris County, Texas

CITATION

THE STATE OF TEXAS
County of Harris

TO: SENTINEL INSURANCE CO LTD (DBA THE HARTFORD) BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE.

This instrument was filed on April 2, 2020, in the above numbered and styled cause on the docket in the above Judicial District Court of Harris County, Texas, in the courthouse in the City of Houston, Texas. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

ISSUED AND GIVEN UNDER MY HAND and seal of said Court, at Houston, Texas, this April 3, 2020.



Marilyn Burgess

Marilyn Burgess, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002

Generated By: WANDA CHAMBERS

Issued at request of:
AMMONS, ROBERT E.
3700 MONTROSE BLVD.
HOUSTON, TX 77006-
713-523-1606

Bar Number: 01159820

Tracking Number: 73740376

CAUSE NUMBER: 202020934

PLAINTIFF: SEAN BOUTROS M D P A

In the 190th

vs.

Judicial District Court

DEFENDANT: SENTINEL INSURANCE CO LTD
(D/B/A THE HARTFORD)

of Harris County, Texas

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____. M., on the _____ day of _____, 20_____.

Executed at (address) _____
in _____ County
at _____ o'clock _____. M., on the _____ day of _____, 20 _____,

by delivering to _____ defendant,
in person, a true copy of this
Citation together with the accompanying _____ copy(ies) of the
_____ Petition
attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 20 _____.

FEE: \$ _____
_____ of _____

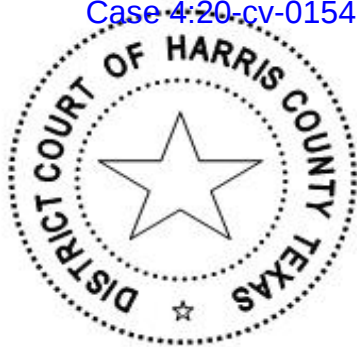
County, Texas

Affiant By: _____
Deputy

On this day, _____, known to me to be
the person whose signature
appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited
on the return.

SWORN TO AND SUBSCRIBED BEFORE ME on this _____ of _____, 20 _____

Notary Public



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90134440 Total Pages: 3

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com



Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

Marilyn Burgess - District Clerk Harris County
Envelope No. 42129843
By: Wanda Chambers
Filed: 4/6/2020 9:31 AM

Request for Issuance of Service

CASE NUMBER: 2020-20934 CURRENT COURT: 190th

Name(s) of Documents to be served: Plaintiff's Original Petition and Request for Disclosure

FILE DATE: 4/2/20 Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Alliant Insurance Services Houston, LLC

Address of Service: 211 E. 7th Street, Suite 620

City, State & Zip: Austin, Texas 78701-3218

Agent (if applicable) Corporation Service Company

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- Citation Citation by Posting Citation by Publication Citations Rule 106 Service
- Citation Scire Facias Newspaper _____
- Temporary Restraining Order Precept Notice
- Protective Order
- Secretary of State Citation (\$12.00) Capias (not by E-Issuance) Attachment (not by E-Issuance)
- Certiorari Highway Commission (\$12.00)
- Commissioner of Insurance (\$12.00) Hague Convention (\$16.00) Garnishment
- Habeas Corpus (not by E-Issuance) Injunction Sequestration
- Subpoena
- Other (Please Describe) _____

(See additional Forms for Post Judgment Service)

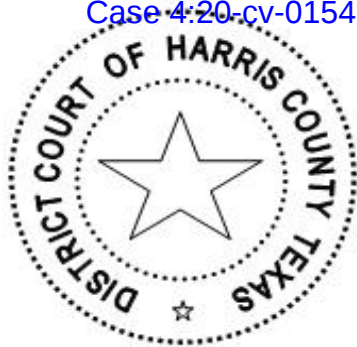
SERVICE BY (check one):

- ATTORNEY PICK-UP (phone) _____
- MAIL to attorney at: _____
- CONSTABLE
- CERTIFIED MAIL by District Clerk
- E-Issuance by District Clerk
(No Service Copy Fees Charged)
*Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.
Visit www.hcdistrictclerk.com for more instructions.*
- CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
- OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Patrick Luff Bar # or ID 01159820

Mailing Address: 3700 Montrose Blvd., Houston, TX 77006

Phone Number: (713) 523-1606



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90147661 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

CAUSE NO. 2020-20934

SEAN BOUTROS M D P A
PLAINTIFF

VS.

SENTINEL INSURANCE CO LTD D/B/A THE
HARTFORD, ET AL
DEFENDANT

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IN THE 190th District Court

HARRIS COUNTY, TX

RETURN OF SERVICE

ON Monday, April 6, 2020 AT 1:26 PM

CITATION, PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE for service on ALLIANT INSURANCE SERVICES HOUSTON LLC C/O REGISTERED AGENT CORPORATION SERVICE COMPANY came to hand.

ON Tuesday, April 7, 2020 AT 10:35 AM, I, Dane R Cuppett, PERSONALLY DELIVERED THE ABOVE-NAMED DOCUMENTS TO: ALLIANT INSURANCE SERVICES HOUSTON LLC C/O REGISTERED AGENT CORPORATION SERVICE COMPANY, by delivering to Samantha Guerra, 211 E 7TH STREET SUITE 620, AUSTIN, TRAVIS COUNTY, TX 78701.

My name is Dane R Cuppett. My address is 7421 BURNET ROAD NO. 501, AUSTIN, TX 78757. I am a private process server certified by the Texas Judicial Branch Certification Commission (PSC 07114, expires 10/31/2021). My e-mail address is info@easy-serve.com. My date of birth is 10/9/1984. I am in all ways competent to make this statement, and this statement is based on personal knowledge. I am not a party to this case and have no interest in its outcome. I declare under penalty of perjury that the foregoing is true and correct.

Executed in TRAVIS COUNTY, TX on Tuesday, April 7, 2020.

/S/ Dane R Cuppett

Boutros #26001

Doc ID: 272398_1

Receipt Number: 898378

EML

Tracking Number: 73740776

COPY OF PLEADING PROVIDED BY PLT

CAUSE NUMBER: 202020934

PLAINTIFF: SEAN BOUTROS M D P A	In the 190th Judicial
vs.	District Court of
DEFENDANT: SENTINEL INSURANCE CO LTD (D/B/A THE HARTFORD)	Harris County, Texas

CITATION

THE STATE OF TEXAS
County of Harris

TO: ALLIANT INSURANCE SERVICES HOUSTON LLC BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY
211 E 7TH STREET SUITE 620
AUSTIN TX 78701

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE.

This instrument was filed on April 2, 2020, in the above numbered and styled cause on the docket in the above Judicial District Court of Harris County, Texas, in the courthouse in the City of Houston, Texas. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

ISSUED AND GIVEN UNDER MY HAND and seal of said Court, at Houston, Texas, this April 6, 2020.



Marilyn Burgess

Marilyn Burgess, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002

Generated By: WANDA CHAMBERS

Issued at request of:
LUFF, PATRICK
3700 MONTROSE BLVD.
HOUSTON, TX 77006-
713-523-1606

Bar Number: 24092728

Tracking Number: 73740776

CAUSE NUMBER: 202020934

PLAINTIFF: SEAN BOUTROS M D P A

In the 190th

vs.

Judicial District Court

DEFENDANT: SENTINEL INSURANCE CO LTD
(D/B/A THE HARTFORD)

of Harris County, Texas

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock _____. M., on the _____ day of _____, 20_____.

Executed at (address) _____
in _____ County
at _____ o'clock _____. M., on the _____ day of _____, 20 _____,

by delivering to _____ defendant,
in person, a true copy of this
Citation together with the accompanying _____ copy(ies) of the
_____ Petition
attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 20 _____.

FEE: \$ _____
_____ of _____

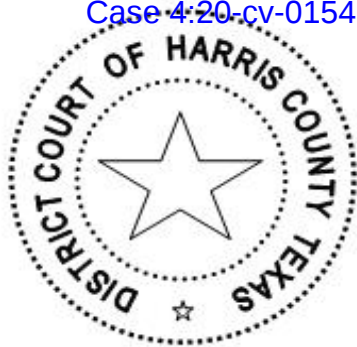
County, Texas

Affiant By: _____
Deputy

On this day, _____, known to me to be
the person whose signature
appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited
on the return.

SWORN TO AND SUBSCRIBED BEFORE ME on this _____ of _____, 20 _____

Notary Public



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90164485 Total Pages: 3

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 2020-20934

SEAN BOUTROS, M.D., P.A.,

Plaintiff,

v.

**SENTINAL INSURANCE CO., LTD.
D/B/A THE HARTFORD, AND
ALLIANT INSURANCE SERVICES
HOUSTON, LLC,**

Defendants.

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IN THE DISTRICT COURT

190TH JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

**DEFENDANT ALLIANT INSURANCE SERVICES HOUSTON, LLC'S ANSWER TO
PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant ALLIANT INSURANCE SERVICES HOUSTON, LLC ("Alliant") files this Answer to Plaintiff's Original Petition:

GENERAL DENIAL

Pursuant to TEXAS RULE OF CIVIL PROCEDURE 92, Alliant denies each and every, all and singular, of the material allegations contained in Plaintiff's Original Petition and any subsequent amendments thereto and demands strict proof of each and every allegation by the applicable legal standard under Texas law.

PRAYER

WHEREFORE, Alliant prays that:

- a. Plaintiff takes nothing by way of its claims;
- b. Alliant recover its attorney fees, costs, and expenses as allowed by law; and

- c. Alliant recovers such other and further relief, at law or in equity, to which it may be justly entitled.

Respectfully submitted,

GORDON & REES

/s/ Robert A. Bragalone

ROBERT A. BRAGALONE

State Bar No. 02855850

BBragalone@grsm.com

B. RYAN FELLMAN

State Bar No. 24072544

RFellman@grsm.com

2200 Ross Avenue, Suite 3700

Dallas, Texas 75201

214-231-4660 (Telephone)

214-461-4053 (Facsimile)

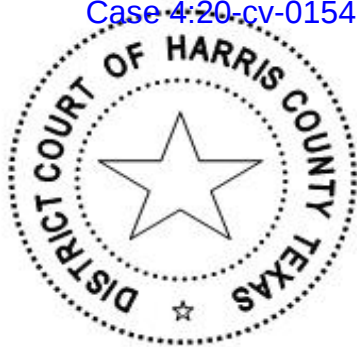
**ATTORNEYS FOR DEFENDANT
ALLIANT INSURANCE SERVICES
HOUSTON, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on all counsel of record pursuant to TEXAS RULES OF CIVIL PROCEDURE 21 and 21a on April 25, 2020.

/s/ Robert A. Bragalone

Robert A. Bragalone



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this April 28, 2020

Certified Document Number: 90360881 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com