

**CAUSE NO. 18-C-3491**

**STREETS TO SHEETS ANIMAL  
RESCUE**

v.

**MUTTS & MAYHEM ANIMAL  
RESCUE and SELENA SCHMIDT**

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**IN THE COUNTY COURT**

**AT LAW NO. 1**

**ELLIS COUNTY, TEXAS**

**DEFENDANT'S OBJECTIONS AND ANSWERS TO  
PLAINTIFF'S INTERROGATORIES**

To: Plaintiff Streets to Sheets Animal Rescue, by and through her attorney of record, Randall E. Turner, Law Offices of Randall E. Turner, PLLC, 5017 El Campo Ave., Fort Worth, Texas 76107.

**COMES NOW**, Mutts & Mayhem Animal Rescue and Selena Schmidt, Defendants in the above-entitled and numbered cause pursuant to the TEXAS RULES OF CIVIL PROCEDURE, files this its Objections and Answers to Plaintiff's Interrogatories.

Respectfully submitted,

By: \_\_\_\_\_

**TODD J. HARLOW**

Texas Bar No. 24036724

**NINA L. VALDEZ**

Texas Bar No. 24071179

**COWLES & THOMPSON, P.C.**

901 Main Street, Suite 3900

Dallas, TX 75202

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**ATTORNEYS FOR DEFENDANTS**

## **PLAINTIFF'S INTERROGATORIES**

### **INTERROGATORY NO. 1:**

Please state the name, address, and telephone number and position with Mutts & Mayhem of each person who assisted in answering to these interrogatories.

**ANSWER:** Selena Schmidt, President and Chief Financial Officer of Mutts & Mayhem Animal Rescue, c/o Nina L. Valdez & Todd. J. Harlow, Cowles & Thompson, P.C., 901 Main Street, Suite 3900 Dallas, Texas 75202, (214) 672-2164.

### **INTERROGATORY NO. 2:**

If Mutts & Mayhem Emergency Search and Rescue denies that Plaintiff owns Hobo, please describe the facts which support this denial.

**ANSWER:** Defendants object to this request as it seeks a narrative more appropriate for a deposition. Subject to said objection and without waiving same, Defendants' refer Plaintiff to its Amended Answer and Motion for Traditional and No Evidence Summary Judgment.

### **INTERROGATORY NO. 3:**

If Mutts & Mayhem Emergency Search and Rescue claims that it owns Hobo, please describe the facts which support this claim.

**ANSWER:** Defendants object to this request as it seeks a narrative more appropriate for a deposition. Defendants further object to this request as it asks Defendants to marshal its evidence. Subject to said objection and without waiving same, Defendants' refer Plaintiff to its Amended Answer and Motion for Traditional and No Evidence Summary Judgment.

### **INTERROGATORY NO.4:**

Please state the following with respect to each oral or written agreement between StreetsToSheets and Mutts & Mayhem regarding Hobo:

- a. The date and terms of the agreement;

**ANSWER:** Defendants objects to the request because it is overly broad and seeks information that is not relevant to claims or defenses in this matter. Defendant further objects to this entire request as compound in seeking multiple interrogatory answers within one interrogatory.

- b. The name, address, and telephone number of each person who participated in making the agreement;

**ANSWER:** Defendants object to this request as Defendants have not alleged a breach of contract action and the request therefore seeks irrelevant information.

Defendants objects to the request because it is overly broad and seeks information that is not relevant to claims or defenses in this matter. Defendant further objects to this entire request as compound in seeking multiple interrogatory answers within one interrogatory.

c. If the agreement was oral, the name, address, telephone number and position with any rescue organization of each person who was present at the time the agreement was made or was a witness to the agreement.

**ANSWER:** Defendants objects to the request because it is overly broad and seeks information that is not relevant to claims or defenses in this matter. Defendant further objects to this entire request as compound in seeking multiple interrogatory answers within one interrogatory.

d. A description of all electronic or written records which evidence or show the agreement.


**ANSWER:** Defendants object to this request as a vague and confusing as it seeks a description of written documents it is more appropriate for a request for production.

### **CERTIFICATE OF SERVICE**

This is to certify that on this 19<sup>th</sup> day of September, 2018, a true and correct copy of the foregoing was sent to the following counsel of record to the following counsel of record:

**Via E-Service**

Randall E. Turner  
LAW OFFICES OF RANDALL E. TURNER, PLLC  
5017 El Campo Ave. Fort Worth, TX 76107

  
\_\_\_\_\_  
**Nina L. Valdez**

VERIFICATION

STATE OF TEXAS

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COUNTY OF

Collin

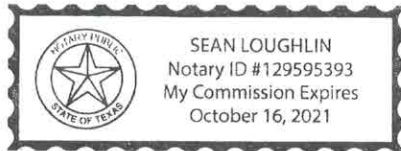
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BEFORE ME, the undersigned Notary Public, on this day personally appeared SELENA SCHMIDT, who being by me duly sworn on her oath, deposed and said that she is duly qualified and authorized in all respects to make this affidavit, she has read the above and foregoing Objections and Answers to Plaintiff Streets To Sheets' Interrogatories, is she has personal knowledge of the factual information contained in the answers to Interrogatories, and that information is true and correct.

*Selena Schmidt*

SUBSCRIBED AND SWORN to before me on this 19<sup>th</sup> day of September, 2018.



*Sean Loughlin*  
NOTARY PUBLIC, In and For the  
STATE OF TEXAS

My Commission Expires:

10/16/2021