

MARY KAY, INC.,

Plaintiff.

vs.

ALLISON LEE LAMARR and
DRIVEN, INC.,

Defendants.

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IN THE DISTRICT COURT PM 3:15

CLERK
DALLAS COUNTY, TEXAS

DALLAS COUNTY, TEXAS

193rd JUDICIAL DISTRICT

**ALLISON LEE LAMARR AND DRIVEN, INC.'S
ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants Allison Lee LaMarr ("Ms. LaMarr") and Driven, Inc. ("Driven")(collectively "Defendants"), file this Original Answer and for good cause show this Court as follows:

I.

GENERAL DENIAL

Defendants deny each and every allegation contained in Plaintiff's Original Petition and demand strict proof thereof by a preponderance of the evidence.

II.

AFFIRMATIVE DEFENSE

Pleading further, if same be necessary, Defendants plead waiver as to Mary Kay's complaints and causes of action arising from or related to Ms. LaMarr's and Driven's actions while Ms. LaMarr was an independent national sales director. Mary Kay had full knowledge of Defendants' actions and knowingly and intentionally waived any claims that allegedly arise from those actions.

WHEREFORE, PREMISES CONSIDERED. Defendants Allison Lee LaMarr and Driven, Inc. respectfully request that, upon a hearing of this matter, Plaintiff take nothing by its suit herein. Defendants recover their costs of Court and they be granted such other and further relief to which they may show themselves justly entitled.

Respectfully submitted,



ELIZABETH CARROLL
State Bar No. 00787209
RICHARD LAW GROUP, INC.
8411 Preston Road, Suite 890
Dallas, Texas 75225
(214) 206-4300
(214) 206-4330 fax

*Counsel for Allison Lee LaMarr and
Driven, Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true copy of the above and foregoing document has been forwarded to all known counsel of record pursuant to the Texas Rules of Civil Procedure on this the 5th day of December 2011.



ELIZABETH CARROLL



FILED

Richard Law Group, Inc.
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11 DEC -7 PM 3:15

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WESLEY HINES
DISTRICT CLERK
DALLAS, TEXAS

DEPUTY

Direct Dial: 214-206-4305
E-Mail: kassie@richardlawgroup.com

December 5, 2011

Via U.S. Mail

Carolyn Taylor, Chief Clerk
193rd District Court
George L. Allen, Sr. Courts Bldg.
600 Commerce Street, Box 822
Dallas, Texas 75202

Re: *Mary Kay, Inc. v. Allison Lee LaMarr and Driven, Inc.*;
Cause No. 11-10797

Dear Ms. Taylor:

Enclosed herein is an original and one (1) copy of *Allison Lee LaMarr and Driven, Inc.'s Original Answer to Plaintiff's Original Petition* for filing in the above-referenced matter. Please return a file-stamped copy to me in the enclosed envelope.

Should you have any questions or wish to discuss, please do not hesitate to contact me.

Sincerely,

M.K. Kassie Hines,
Paralegal to Elizann Carroll

kh/
enclosures

cc: John T. Cox, III (via U.S. Mail w/ enclosure)

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