

THE STATE OF TEXAS,

Plaintiff,

v.

XEROX CORPORATION, XEROX STATE
HEALTHCARE, LLC, and ACS HEALTHCARE,
LLC,

Defendants,

v.

ATLAS DENTAL, LP and DR. HIEU HUYNH;
IRMA CANTU-THOMPSON, DDS, PC and
IRMA CANTU-THOMPSON; DR. STEPHEN
CHU; DR. RICHARD F. HERRSCHER; MAN &
CFN ORTHO, PLLC, NAVARRO
ORTHODONTIX OF IRVING, PC, NAVARRO
ORTHODONTIX OF FT. WORTH, PLLC,
NAVARRO ORTHODONTIX OF MCALLEN,
PLLC, NAVARRO ORTHODONTIX OF
EDINBURG, PLLC, NAVARRO
ORTHODONTIX, PC, and DR. CARLOS F.
NAVARRO; RGV SMILES BY ROCKY L.
SALINAS, DDS, PA and DR. ROCKY
SALINAS; WESTMORELAND DENTAL, PA,
WESTMORELAND DENTAL OF GARLAND,
PC; WESTMORELAND DENTAL AND
ORTHODONTICS, PA, and SCOTTIE H.
NGUYEN, DDS; and VICTOR M. ZURITA,
DDS,

Intervenors.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

53RD JUDICIAL DISTRICT

XEROX’S ORIGINAL ANSWER TO PLEAS IN INTERVENTION

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Xerox Corporation, Xerox State Healthcare, LLC, and ACS State Healthcare, LLC (collectively “Xerox”) and files this original answer, pursuant to Rule 92 of the

Texas Rules of Civil Procedure, in order to respond to the allegations and causes of action asserted in the pleas in intervention filed by Intervenor Atlas Dental, LP and Dr. Hieu Huynh; Irma Cantu-Thompson, DDS, PC and Irma Cantu-Thompson; Dr. Stephen Chu; Dr. Richard F. Herrscher; MAN & CFN Ortho, PLLC, Navarro Orthodontix of Irving, PC, Navarro Orthodontix of Ft. Worth, PLLC, Navarro Orthodontix of McAllen, PLLC, Navarro Orthodontix of Edinburg, PLLC, Navarro Orthodontix, PC, and Dr. Carlos F. Navarro; RGV Smiles by Rocky L. Salinas, DDS, PA and Dr. Rocky Salinas; Westmoreland Dental, PA, Westmoreland Dental of Garland, PC, Westmoreland Dental and Orthodontics, PA, and Scottie H. Nguyen, DDS; and Victor M. Zurita, DDS (collectively “Intervenor”) and any subsequently amended or supplemented plea in intervention. In support thereof, Xerox would respectfully show the Court as follows:

GENERAL DENIAL

Subject to stipulations or admissions that may hereafter be made, Xerox enters its general denial, pursuant to Rule 92 of the Texas Rules of Civil Procedure, thereby denying each and every, all and singular, of the material allegations made by Intervenor, and Xerox requests that each of Intervenor be required to prove all charges and allegations by the applicable standard of proof required by the laws of the State of Texas.

AMENDMENT AND SUPPLEMENTATION OF ANSWER

Xerox reserves its rights to amend and/or supplement its answer pursuant to the Texas Rules of Civil Procedure and orders of the Court.

PRAYER


WHEREFORE, PREMISES CONSIDERED, Xerox respectfully requests that this Court, upon full and final hearing of this matter, enter judgment that Intervenor take nothing against Xerox by way of their claims in this action and for such other relief, both special and general, in law and in equity, to which Xerox may show itself to be justly entitled.

Respectfully submitted,

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AND ACS STATE HEALTHCARE, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 2014, I caused a copy of the foregoing to be served to the following counsel via e-mail:

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