

Cause No. 96860

CF

JERRY A. GOODSON,	)	
	)	
Plaintiff,	)	IN THE <u>354th</u>
	)	JUDICIAL DISTRICT COURT
vs.	)	
	)	OF HUNT COUNTY, TEXAS
CITY OF HAWK COVE, TEXAS,	)	
	)	
Defendant.	)	
_____	)	

DEFENDANT CITY OF HAWK COVE, TEXAS'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant City of Hawk Cove, Texas ("City"), files this Original Answer to Plaintiff Jerry A. Goodson's Original Petition for Writ of Mandamus under Texas Government Code § 552.321 and respectfully shows:

I. GENERAL DENIAL

1. Pursuant to Texas Rule of Civil Procedure 92, the City generally denies each and every allegation in Plaintiff's petition and demands that Plaintiff prove the allegations and entitlement to relief as required by law.

II. STATUTORY DUTIES AND RELIEF

2. Defendant City of Hawk Cove, Texas acknowledges that it is a governmental body subject to the Texas Public Information Act, Texas Government Code Chapter 552. Defendant denies that its inability to obtain responsive public information from a temporary custodian, standing alone, establishes that Defendant or its officer for public information failed to perform an applicable statutory duty.

3. Texas Government Code § 552.203(4), upon satisfaction of its statutory conditions, requires the officer for public information to make reasonable efforts to obtain requested public information from a temporary custodian. Texas Government Code § 552.233(b) separately requires a temporary custodian having possession, custody, or control of public information to surrender or return that information to the governmental body.

4. Defendant denies that Plaintiff is entitled to the mandamus relief requested in paragraph 24 of Plaintiff's Original Petition. Defendant does not admit that the records described in Plaintiff's Exhibit D presently remain within the possession, custody, or control of the temporary custodian, or that Defendant has failed to make the reasonable efforts required by applicable law. Defendant reserves all lawful objections to the scope and form of any proposed writ.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant City of Hawk Cove, Texas respectfully requests that Plaintiff's requested mandamus relief be denied; costs be taxed as

authorized by applicable law; and this Court grant Defendant such other and further relief, at law or in equity, to which it may be entitled.

Respectfully submitted this 16th day of October, 2026.

LAW OFFICES OF RONNA L. HODGES
P.O. Box 907
Quinlan, Texas 75474
Telephone: (903) 356-4459
hodges1924@hotmail.com

By /s/ Ronna L. Hodges
Ronna L. Hodges, SBN 24034484
Attorney for City of Hawk Cove, Texas

CERTIFICATE OF SERVICE: I certify that on this 16th day of October, 2026, a true and correct copy of this document was served upon Plaintiff Jerry A. Goodson, appearing pro se, through the electronic filing manager's electronic-service system in accordance with Texas Rule of Civil Procedure 21a, with an additional courtesy copy transmitted by electronic mail to


/s/ Ronna L. Hodges
Ronna L. Hodges