

No. DC-10-11915

JEFF BARON,

*Plaintiff,*

v.

GERRIT M. PRONSKE, Individually,  
AND PRONSKE, GOOLSBY &  
KATHMAN, P.C. f/k/a PRONSKE &  
PATEL, P.C.,

*Defendants.*

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IN THE DISTRICT COURT

OF DALLAS COUNTY, TEXAS

193<sup>RD</sup> JUDICIAL DISTRICT

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JEFFREY BARON'S SECOND SUPPLEMENTAL ANSWER TO FIRST AMENDED  
COUNTERCLAIM

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TO THE HONORABLE CARL GINSBERG:

COMES NOW Jeffrey Baron ("Baron"), Plaintiff and Counter-Defendant, and files this *Supplement to Answer to First Amended Counterclaim* filed by Gerrit M. Pronske ("Pronske") and Pronske and Patel P.C. n/k/a Pronske, Goolsby & Kathman, P.C. ("PG&K"),<sup>1</sup> and would respectfully show the Court as follows:

**Supplement to Affirmative Defenses**

Baron asserts the Counter-Plaintiff's claims are barred by prior material breach of the underlying contract, thus excusing Baron from performing the same.

WHEREFORE, PREMISES CONSIDERED, Baron respectfully requests that Pronske and PG&K take nothing by reason of this suit; that all costs be adjudged against Pronske and PG&K; that Baron's Special Exceptions to Pronske and PG&K's *Amended Counterclaim* be sus-

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<sup>1</sup> This supplements the Answer filed by Plaintiff on or about June 5, 2014.

tained and that Pronske and PG&K be ordered to re-plead with particularity or that Pronske and PG&K's allegations, in their general scope, be stricken. Baron requests such other and further relief, in law and equity, general or special, to which Baron may be entitled.

Respectfully Submitted,

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/s/ William P. Haddock

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*Counsel for Jeff Baron*

### Certificate of Service

I hereby certify that a true and correct copy of the above Jeffrey Baron's Second Supplemental Answer to First Amended Counterclaim has been served on the following counsel/parties of record in accordance with TEX. R. CIV. P. 21a and local rules for electronic filing and service on this 18<sup>th</sup> day of August 2014.

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Melanie P. Goolsby  
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/s/ William P. Haddock  
William P. Haddock