

No. 15-2186-W

RONALD F. AVERY

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IN THE DISTRICT COURT

VS.

GUADALUPE COUNTY, TEXAS

DYLAN BADDOUR;
HEARST COMMUNICATIONS, INC.

25TH JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION
AND
REQUEST FOR DISCLOSURE

FILED
12:08 PM
NOV 03 2015

Clerk, Dist. Court, Guadalupe Co. Tx.

A. DISCOVERY - CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 2 of the Texas Rule of Civil Procedure 190.3 and affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rule of Procedure 169 because Plaintiff seeks monetary relief over \$100,000.

B. RELIEF

- 2. Plaintiff seeks monetary relief over \$10,000,000.00
- 3. Plaintiff seeks a Court Order compelling defendants to print a sufficient Correction, Clarification and Retraction as requested by Plaintiff prior to filing suit.

C. PARTIES

- 4. Plaintiff, Ronald F. Avery, a resident of Guadalupe County, Texas, brings this suit and resides at 1933 Montclair Dr., Seguin, Texas, 78155.
- 5. Defendent, Dylan Baddour, is a reporter for The Houston Chronicle, located in Harris County, Texas, and may be served at The Houston Chronicle, located at 801 Texas Ave., Houston, Texas 77002.