

CAUSE NO. 2025-2095-A

**BERNARD BLACK, individually
and as Co-Trustee of the Ruth H.
Black Revocable Living Trust,**
Plaintiff,

IN THE DISTRICT COURT

v.

188th JUDICIAL DISTRICT

**THE UNKNOWN HEIRS OF
SARAH L. DANSBY, DECEASED,
ET AL.,**
Defendants.

GREGG COUNTY, TEXAS

DEFENDANT DESTINY TOWNLEY'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

Note: Defendant is named in Plaintiff's Third Amended Petition as "Destine Townley." Defendant's correct name is Destiny Townley, and she appears and answers herein as the person so named.

Defendant Destiny Townley, appearing pro se, files this Original Answer in response to Plaintiff's Third Amended Petition to Partition Real Property, and respectfully shows the Court as follows:

1. Appearance and Participation

Defendant appears in this matter and respectfully requests that the Court recognize her appearance and keep her informed of proceedings affecting the property or any interest she may hold. Defendant may not be able to attend every proceeding in person, but intends to remain involved and requests notice of hearings, proposed sales, and other material actions concerning the property, together with an opportunity to participate remotely when permitted by the Court.

2. Response to Plaintiff's Petition

Defendant is not presently asserting that Plaintiff's allegations or claimed interests are incorrect. Defendant has not independently verified all matters concerning title, heirship, and the respective interests in the property, and therefore does not admit those matters at this time. To the extent required by Rule 92 of the Texas Rules of Civil Procedure, Defendant generally denies each and every allegation contained in Plaintiff's Third Amended Petition and demands strict proof thereof, and requests that the respective interests of the parties be established through these proceedings.

3. Defendant's Potential Interest

Defendant does not intend by filing this Answer to waive, disclaim, or concede any ownership, heirship, mineral, royalty, surface, leasehold, or other interest she may have in the property, nor to agree to any particular ownership percentage or allocation. Defendant respectfully requests notice and an opportunity to review information affecting any such interest before final disposition of the property.

4. Mineral, Oil, Gas, and Related Interests

Before any final sale or disposition of the property, Defendant respectfully requests that any existing mineral, oil, gas, royalty, lease, or similar interests associated with the property be identified and considered. Defendant is not asserting that such interests necessarily exist or that they have not already been investigated. If those matters have already been addressed, Defendant respectfully requests notice of or access to the relevant information. If they have not been addressed, Defendant requests notice and an opportunity to review that information before any action is taken that could affect such interests.

5. Heirs' Property Protections

Plaintiff has pleaded that this action falls within Chapter 23A of the Texas Property Code. Without admitting or denying that characterization at this time, Defendant respectfully requests that, to the extent Chapter 23A applies, the Court afford the parties the determinations and protections provided by that chapter, including the determination of heirs' property status, the court-ordered appraisal, the cotenant buyout provisions, and the preference for partition in kind, before any partition by sale is ordered.

6. Further Information

Defendant is continuing to review the matters raised in the petition and reserves the right to amend or supplement this Answer as permitted by the Texas Rules of Civil Procedure.

PRAYER

Defendant respectfully requests that the Court recognize her appearance in this case, preserve her right to receive notice of and participate in proceedings concerning the property and any interest she may hold, require that the respective interests of the parties be established by proof, ensure that relevant mineral, oil, gas, royalty, lease, or related interests are identified and considered before final disposition, apply the protections of Chapter 23A of the Texas Property Code to the extent applicable, and grant such other and further relief, at law or in equity, to which she may be justly entitled.

Respectfully submitted,

Destiny Townley, Pro Se

Defendant

5503 67th Street

Lubbock, Texas 79424

Telephone: _____

Email: _____

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that on the _____ day of _____, 2026, a true and correct copy of the foregoing Defendant Destiny Townley's Original Answer was served upon the following counsel of record through the electronic filing manager (eFileTexas) and/or by electronic mail, in accordance with Rules 21 and 21a of the Texas Rules of Civil Procedure:

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Destiny Townley
Defendant, Pro Se