

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. 43,647

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
ALLISON GELBE-PINKUS	§	
AND	§	510TH JUDICIAL DISTRICT
MARK PINKUS	§	
	§	
AND IN THE INTEREST OF	§	
TODD PINKUS, THOMAS PINKUS	§	
AND LUCY PINKUS, CHILDREN	§	DENTON COUNTY, TEXAS

RESPONDENT'S ORIGINAL ANSWER

Mark Pinkus, Respondent, files this Original Answer to Original Petition for Divorce. The last three numbers of Mark Pinkus's driver's license number are 782. The last three numbers of Mark Pinkus's Social Security number are 998.

1. General Denial

Respondent enters a general denial.

2. Objection to Assignment of Case to Associate Judge

Respondent objects to the assignment of this matter to an associate judge for a trial on the merits or presiding at a jury trial.

3. Information about Children

Information required by section 152.209 of the Texas Family Code is provided in the affidavit attached as Exhibit 1.

Information required by section 154.181(b) and section 154.1815 of the Texas Family Code is provided in the statements attached as Exhibits 2 and 3.

4. Premarital Agreement

Petitioner and Respondent have entered into a premarital agreement altering their marital property rights in certain property on and during their marriage. Petitioner requests the Court to enforce the agreement and divide the marital estate in accordance with its terms.

5. Rule 194 Requests for Disclosure

Pursuant to Rule 194, you are requested to disclose, within 30 days of service of this petition, the information or material described in Rule 194.2(a)-(f), (h), and (i).

6. *Prayer*

Respondent prays that Petitioner take nothing and that Respondent be granted all relief requested in this Original Answer.

Respondent prays for general relief.

Respectfully submitted,

Tisdale, Indelicato & Key
227 Oak Street, Suite 1200
Denton, Texas 76201
Tel: (xxx) xxx-xxxx
Fax: (xxx) xxx-xxxx
E-mail: Cindy@TIK.com

By: /s/ Cindy V. Tisdale

Cindy V. Tisdale
State Bar No. 00792700
Attorney for Respondent

Certificate of Service

I certify that a true copy of this document was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on December 10, 2018:

Christopher K. Wrampelmeier by electronic filing manager.

/s/ Cindy V. Tisdale

Cindy V. Tisdale
Attorney for Respondent

EXHIBIT 1
DECLARATION FOR UCCJEA INFORMATION

My name is Mark Pinkus. I am above the age of eighteen years, and I am fully competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

I am the Respondent in this case.

The present address of Mark Pinkus, Todd Pinkus, and Thomas Pinkus is 2300 California Street, Unit 2301, San Francisco, California 94123.

The present address of Allison Gelbe-Pinkus and Lucy Pinkus is 5400 Hwy 455, Little Elm, Denton County, Texas 76258.

The present address of Nancy Poe is 504 Marin Drive, San Francisco, California 94112.

For the past five years immediately preceding the date of this declaration, the children have lived at the following addresses with the following persons:

Todd Pinkus and Thomas Pinkus

Address: 5400 Hwy 455, Little Elm, Denton County, Texas 76258
Persons lived with: Allison Gelbe-Pinkus and Mark Pinkus
Date: March 1, 2013 - June 1, 2018.

Address: 2300 California Street, Unit 2301, San Francisco, California 94123
Persons lived with: Mark Pinkus
Date: June 1, 2018 – December 10, 2018.

Lucy Pinkus

Address: 5400 Hwy 455, Little Elm, Denton County, Texas 76258
Persons lived with: Allison Gelbe-Pinkus
Date: November 5, 2018 – December 10, 2018.

I have not participated, as a party or as a witness or in any other capacity, in any other proceeding concerning the custody of or visitation with the children in Texas or any other state.

I do not know of any proceeding that could affect this proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, and adoptions.

I do not know of any person not a party to this proceeding who has physical custody of the children or claims rights of legal custody or physical custody of, or visitation with, the children.

/s/ Mark Pinkus

Mark Pinkus

My name is Mark Pinkus, my date of birth is xx/xx/xxxx, and my address is 2300 California Street, Unit 2301, San Francisco, California 94123. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Santa Cruz County, California, on December 10, 2018.

/s/ Mark Pinkus
Mark Pinkus, Declarant

EXHIBIT 2
STATEMENT OF HEALTH INSURANCE AVAILABILITY

This statement is made by Mark Pinkus, Respondent, in accordance with section 154.181 of the Texas Family Code.

1. Children

The following children are the subject of this suit:

Name: Todd Pinkus

Birth date: March 1, 2013

Name: Thomas Pinkus

Birth date: March 1, 2013

Name: Lucy Pinkus

Birth date: November 5, 2018

2. Health Insurance Availability

Private health insurance is in effect for the children, Todd Pinkus, Thomas Pinkus and Lucy Pinkus.

Name of insurance company: BlueCross BlueShield

Policy number: XXXXXX1234

Party responsible for premium: Mark Pinkus, a parent, through his employment

Monthly cost of premium: \$300.00

Date: December 10, 2018.

/s/ Mark Pinkus

Mark Pinkus

EXHIBIT 3
STATEMENT OF DENTAL INSURANCE AVAILABILITY

This statement is made by Mark Pinkus, Respondent, in accordance with section 154.1815 of the Texas Family Code.

1. Children

The following children are the subject of this suit:

Name: Todd Pinkus

Birth date: March 1, 2013

Name: Thomas Pinkus

Birth date: March 1, 2013

Name: Lucy Pinkus

Birth date: November 5, 2018

2. Dental Insurance Availability

Private dental insurance is in effect for the children, Todd Pinkus, Thomas Pinkus and Lucy Pinkus.

Name of insurance company: Golden Gate Dental Insurance Co.

Policy number: XXXXXX6789

Party responsible for premium: Mark Pinkus, a parent, through his employment

Monthly cost of premium: \$90.00

Date: December 10, 2018.

/s/ Mark Pinkus

Mark Pinkus