

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

THE GIL RAMIREZ GROUP, L.L.C.
AND GIL RAMIREZ, JR.

Plaintiffs,

vs.

CIVIL ACTION NO. 4-.10-CV-04872

HOUSTON INDEPENDENT SCHOOL
DISTRICT, JOYCE MOSS CLAY AND &
JM CLAY ASSOCIATES

Defendants

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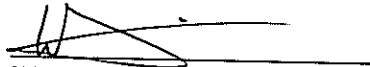
**DEFENDANT JOYCE MOSS CLAY AND JM CLAY & ASSOCIATES'
RESPONSES TO PLAINTIFFS' GIL RAMIREZ GROUP, LLC'S SET OF
INTERROGATORIES**

TO: The Gil Ramirez Group, LLC, through its attorneys Chad Dunn and K. Scott Brazil,
Brazil & Dunn, 201 FM 1960 West, Suite 530, Houston, Texas 77068 and Kelly
Greenwood Prather, The Greenwood Prather Law Firm, 1300 McGowen Street, Houston,
Texas 77004.

Defendants JOYCE MOSS CLAY and JM CLAY & ASSOCIATES ("Clay") and JOYCE
MOSS CLAY and JM CLAY & ASSOCIATES (collectively, "Defendants") file this answers to
Plaintiff's interrogatories, pursuant to Federal Rules of Civil Procedure 26 and 34.

Respectfully submitted,

ANDERSON & SMITH, P.C.

By: 
Wendle Van Smith
SBN: 18701400
One Arena Place
7322 Southwest Freeway., Ste 2010
Houston, Texas 77074
(713) 621-5522
(713) 995-1499 Facsimile
ATTORNEY FOR DEFENDANT
JOYCE MOSS-CLAY

CERTIFICATE OF SERVICE

This is to certify that on May 04, 2012, a true and correct copy of the foregoing document was served in accordance with the rules of federal procedure on the following:

Mr. Chad W. Dunn
Mr. K. Scott Brazil
Brazil & Dunn
4201 FM 1960 West, Suite 530
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Facsimile: 713 221 1212

Mr. Michael J. Stanley
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Thompson & Horton LLP
3200 Southwest Freeway, Suite 2000
Houston TX 77027
Facsimile: 713 583 9928


Wendle Van Smith

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

Please state the name, address and telephone number of each person participating in the responses to these interrogatories.

ANSWER:

Joyce Moss-Clay, 3618 Elcrest Drive, Houston TX 77088; 281-591-8324, 281-260-0653 (fax).

INTERROGATORY NO. 2:

Identify by date, time, location and persons attending, all meetings you had with an owner or employee of Fort Bend Mechanical.

ANSWER:

Cannot document all dates or times. Initial meeting with Fort Bend occurred late January or February 2009 at 13625 Stafford Road, Stafford, TX.

Recurring meetings with Pete Medford, Sharon Medford, regarding our project. Generator installation meetings occurred with employees were on my property in preparing for installation. Conversations with office person related to company logo and project logo. No other meetings occurred between me and employees.

INTERROGATORY NO. 3:

Identify by date, time, location and persons attending all meetings you had with an owner or employee of RHJ-JOC, Inc.

ANSWER:

No documentation

INTERROGATORY NO. 4:

Identify by date, time, location and persons attending all meetings you had with an owner or employee of M Associates of Houston.

ANSWER:

No documentation. Beginning with campaign initiation, regular meetings became a standard on Sunday afternoons at my residence. Other meetings include: HISC, luncheons, my representing him on occasion, ongoing meetings related to officeholder campaign matters.

INTERROGATORY NO. 5:

Identify by date, time, location and persons attending, all of your travel paid for or hosted by any owner or employee of Fort Bend Mechanical or RHJ-JOC, Inc.

ANSWER:

Not a recipient; No travel ever paid by Fort Bend or RHJ.

INTERROGATORY NO. 6:

Identify all telephone numbers and email addresses you have provided to Fort Bend Mechanical.

ANSWER:

Please see Interrogatory #1

INTERROGATORY NO. 7:

Identify all telephone numbers and email addresses you have provided to RHJ-JOC, Inc.

ANSWER:

Please see Interrogatory #1

INTERROGATORY NO. 8:

Identify all telephone numbers and email addresses you have provided to Lawrence Marshall or M Associates of Houston.

ANSWER:

Please see Interrogatory #1

INTERROGATORY NO. 9:

Identify all work performed by or paid for by RHJ-JOC, Inc. at any property which is owned, in whole or in part by you. This includes but is not limited to the generator installed at the residence located at 3618 Elmcrest, Houston, Texas, 77088 in approximately May 2010.

ANSWER:

None.

INTERROGATORY NO. 10:

Identify all work performed by or paid for by Fort Bend Mechanical at any property which is owned, in whole or in part by you. This includes but is not limited to the generator installed at the residence located at 3618 Elmcrest, Houston Texas 77088 in approximately May 2010.

ANSWER:

Work performed at my residence and paid for by me "TO" Fort Bend (invoice attached).

INTERROGATORY NO. 11:

Identify by institution, date of graduation and degree obtained, all education you have received.

ANSWER:

See attached Resume.

INTERROGATORY NO. 12:

Identify by employer, dates of employment, address of employer, and job title, all of your employment from 1980 to present.

ANSWER:

See attached Resume.

INTERROGATORY NO. 13:

Describe what services you provided to Fort Bend Mechanical and how much you were paid for the services.

ANSWER:

By contract at \$3,000/month. Formalized outreach program for grants/funds to HISD schools.

INTERROGATORY NO. 14:

Describe what services you provided to Lawrence Marshall or his company M associates of Houston and how much you were paid for the services.

ANSWER:

During the 70's, consultant on school improvement projects (deseg).

INTERROGATORY NO. 15:

Describe what services you provided to RHJ-JOC, Inc. and how much you were paid for the services.

ANSWER: Counselor/Coach in developing MWBE strategies and effective community outreach programs (2003-200? RHJ with HCC)

INTERROGATORY NO. 16:

If you contend that The Gil Ramirez Group, LLC did anything or failed to do anything that constituted a failure to mitigate damages, please state all facts that support that contention.

ANSWER:

N/A

INTERROGATORY NO. 17:

If you contend that The Gil Ramirez Group, LLC did anything or failed to do anything that was a material breach of the contract excusing HISD's obligation of the contract, please state all facts that support that contention.

ANSWER:

N/A

INTERROGATORY NO. 18:

If you contend that The Gil Ramirez Group, LLC complied with the terms of the contract made the basis of the suit, please state all factual and legal reasons for that contention.

ANSWER:

N/A

INTERROGATORY NO. 19:

If you contend that The Gil Ramirez Group, LLC failed to comply with the terms of the contract made the basis of this suit, please state all factual and legal reasons for that contention.

ANSWER:

N/A

INTERROGATORY NO. 20:

For the person signing the verification of these answers, have you been convicted of a felony or crime of moral turpitude within the preceding 10 years? If so, please state the date of conviction, nature of the crime and the county and state of conviction.

ANSWER:

No

INTERROGATORY NO. 21:

If you intend to introduce evidence of a crime of a witness or party who may be called to testify, please identify the person, date of conviction, nature of crime and the county and state of conviction.

ANSWER:

Have no knowledge relative to this inquiry.

INTERROGATORY NO. 22:

Identify by date and nature of investigation, all investigations conducted of you for payment or gifts from vendors and contractors in exchange for preferential treatment as a vendor or contractor.

ANSWER:

None

INTERROGATORY NO. 23:

Identify the name of all websites for JM Clay & Associates.

ANSWER:

None or ever has been a website for JMClay and Associates.

INTERROGATORY NO. 24:

Describe all advertising or marketing JMClay & Associates has done since its inception to attract customers.

ANSWER:

See attached business cards, Bate stamp #JMClay0015.

