

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

ARIEL CASSONE,	§	
<i>Plaintiff/Counter-Defendant,</i>	§	
	§	
v.	§	
	§	
LOUIS BLACK and THE AUSTIN	§	
CHRONICLE CORP.,	§	Civil Action No. 1:23-CV-1197
<i>Defendants,</i>	§	
	§	
And	§	
	§	
LOUIS BLACK,	§	
<i>Counter-Plaintiff</i>	§	

DEFENDANT LOUIS BLACK’S
ORIGINAL ANSWER AND COUNTERCLAIM

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS, AUSTIN DIVISION:

NOW COMES LOUIS BLACK, Defendant/Counter-Plaintiff, and submits this his Original Answer and Counterclaim:

I.

ORIGINAL ANSWER

1. Defendant Louis Black (“Black”) admits the allegations of para. 1 of Plaintiff’s Original Complaint (“Complaint”).
2. Admitted.
3. Black lacks knowledge or information sufficient to form a belief about the truth of the allegation that Cassone is 42 years old, and denies that she has spent her career working in journalism and film.
4. Denied.

5. Denied.
6. Denied.
7. Denied.
8. Denied.
9. Denied.
10. Denied
11. Black admits that Cassone alleges various causes of action in her Complaint.

* * *

1. Black admits that the Court has jurisdiction over this action.
2. Black admits that venue is proper in this Court.

* * *

3. Denied.
4. Admitted.
5. Black denies that Cassone has been aggrieved, and admits the remainder of the allegations in para. 5.

* * *

6. Admitted.
7. Black admits that the allegations within para. 7 may be true, but he does not recall.
8. Black admits that he was a heavy drinker, but denies the remainder of the allegations of para. 8.
9. Denied.
10. Denied.
11. Denied.

12. Denied.

13. Black admits that he has made sexual comments and propositions to Cassone, but denies the remainder of the allegations of para. 13.

14. Black admits that it is possible that Cassone and he stayed at the Hotel Van Zandt in Austin, but denies the remainder of the allegations.

15. Denied.

16. Black admits that he may have sent Cassone an email referring to “violent sex” as a joke, but denies the remainder of the allegations.

17. Denied.

18. Black admits that he may have consensually tied Cassone to a chair, and denies the remainder of the allegations.

19. Denied.

20. Black admits that Cassone may have occasionally sent him nude or explicit pictures and videos, and denies the remainder of the allegations.

21. Black admits that he may have requested a video of Cassone having sex with her boyfriend, and denies the remainder of the allegations.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Black admits that Cassone may have traveled to Cape Cod on several occasions, but denies the remainder of the allegations.

28. Denied.

29. Black admits that he may have flown Cassone to Boston in September, 2021, but denies the remainder of the allegations.

30. Denied.

31. Denied.

32. Denied.

33. Black admits that Cassone and he may have stayed in a room at the Four Seasons during SXSW, but denies the remainder.

34. Denied.

35. Denied.

36. Denied.

* * *

37-72. Black admits that Cassone alleges various causes of action against him, but denies all allegations of facts in support of those causes of action.

II.

COUNTERCLAIM

1. Counter-Defendant Ariel Cassone has stolen various valuable comic books and pulp magazines from Counter-Plaintiff Louis Black, which she has appropriated to her own use and benefit. Black estimates that the fair market value of his stolen property is approximately \$15,000.00, for which he now sues.

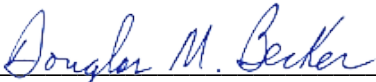
III.

PRAYER

FOR THESE REASONS, Defendant/Counter-Plaintiff Black respectfully prays that Plaintiff Cassone's claims for relief all be denied; and that his Counterclaim be found meritorious; and that he be awarded attorney's fees, costs, and such other further relief as may be equitable and just.

Respectfully submitted,

GRAY BECKER, P.C.
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By:  _____

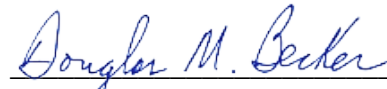
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 1, 2023, to the following counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system:

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Douglas M. Becker