

**CAUSE NO. 2018—DCL-06387-I**

<b>RICHARD GALVAN and</b>	§	<b>IN THE DISTRICT COURT</b>
<b>SONIA GALVAN</b>	§	
<b>Plaintiffs,</b>	§	
<b>vs.</b>	§	
	§	<b>CAMERON COUNTY, TEXAS</b>
	§	
<b>BLAINE CREWS and HANNAH CREWS</b>	§	
<b>Defendants</b>	§	<b>445<sup>th</sup> JUDICIAL DISTRICT</b>

**EXHIBITS 1-13 TO DEFENDANT’S SUPPLEMENTAL BRIEF IN SUPPORT OF SANCTIONS**

- Exhibit 1** - the Crews’s Statement of Facts - 13<sup>th</sup> Court of Appeals
- Exhibit 2** – the Affidavit of Hannah Crews admitted without objection
- Exhibit 3** – the Affidavit of Blaine Crews admitted without objection for all
- Exhibit 4** – The 13<sup>th</sup> Court of Appeals Opinion in this case
- Exhibit 5** – Richard Galvan’s Interrogatories and Responses to Interrogatories;
- Exhibit 6** – Richard Galvan’s Admissions and Responses to Admissions;
- Exhibit 7** – Richard Galvan’s Requests for Production and Responses;
- Exhibit 8** – Sonia Galvan’s Interrogatories and Responses to Interrogatories;
- Exhibit 9** – Sonia Galvan’s Admission and Responses to Admissions; and
- Exhibit 10** – Sonia Galvan’s Requests for Production and Responses
- Exhibit 11** – Richard Galvan Supplemental Responses
- Exhibit 12** – Richard Galvan Second Supplemental Responses
- Exhibit 13** - – Sonia Galvan Supplemental Responses

Respectfully Submitted,

/s/ C. Davis Chapman

C. Davis chapman

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on the below listed counsel of record as indicated below on this 8<sup>th</sup> day of June, 2020.

Angela Nix

via electronic service

          /s/ C. Davis Chapman

CAUSE NO. 2018—DCL-06387-I

RICHARD GALVAN and  
SONIA GALVAN

Plaintiffs,  
vs.

BLAINE CREWS and HANNAH CREWS  
Defendants

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IN THE DISTRICT COURT

CAMERON COUNTY, TEXAS

445<sup>th</sup> JUDICIAL DISTRICT

**EXHIBIT 1 - STATEMENT OF FACTS FROM APPELLANTS' BRIEF**

*A. RICHARD GALVAN SEXUALLY ASSAULTS A TEENAGER IN 2007*

Hannah Crews met Richard and Sonia Galvan as friends of her family before she was a teenager [CR 166]. She and her family attended the Northway Bible Church in Harlingen, Texas along with the Galvans, and the families spent much time together as close friends outside of church activities [CR 166]. Richard Galvan was Hannah Crews's youth pastor from the age of thirteen and at all times relevant to the facts herein [CR 166-167]. In the summer of 2007, when Hannah crews was seventeen, she suffered a traumatic break up with her high school boyfriend [CR 166]. Richard Galvan, as her youth pastor and family friend, offered Hannah Crews a job with his company, Orbit Broadband, and offered to counsel her about her breakup [CR 166-167].

At work at Orbit Broadband, Richard Galvan would call Hannah Crews to his office on an almost daily basis to discuss her feelings and pray over her [CR 167]. During these visits, Richard Galvan would inquire about the details of Hannah

Crews' physical relationship with her ex-boyfriend [CR 167]. Richard Galvan would ask for details regarding what specific intimate acts Hannah had performed with her ex-boyfriend [CR 167]. Eventually, Hannah Crews was convinced to divulge to Richard Galvan that she was still a virgin and had never been sexually active with her ex-boyfriend [CR 167].

During these counseling sessions which occurred at Richard Galvan's office, Richard Galvan would tell Hannah Crews that her physical attachment to her ex-boyfriend was the cause of her heartbreak [CR 167]. Richard Galvan went on to claim to Hannah Crews that healing happens through intimacy [CR 167]. Richard asked Hannah to explain what she thought she needed to do to move on from her pain and trained her to respond that having sex would heal her [CR 167]. Once Richard Galvan conditioned this response, he offered to, "help her out with this," [CR 167, 172]. Richard explained in a counseling session that, as her mentor, it would be safest if Hannah Crews had sex with him instead of someone else [CR 167]. After many of these conversations and sessions, Richard Galvan convinced seventeen year old Hannah Crews that he would not be taking her virginity but that she would be giving it to him because she was trusting him to help her heal spiritually and emotionally [CR 167]. Richard Galvan convinced Hannah Crews that it was ok to have sex with him despite her closeness to his wife Sonia Galvan, stating that

Sonia Galvan would never know about the sex and Hannah Crews should not worry about hurting Sonia Galvan by having sex with him [CR 167].

In subsequent counseling sessions, Richard Galvan began to “educate” Hannah Crews on various sexual acts and stimuli to get her prepared for the day she would have sex with him [CR 168]. After several weeks of these sessions, Richard Galvan rented a room at the La Quinta Hotel in Mercedes, Texas and instructed Hannah Crews to meet him there [CR 168]. This occurred at the beginning of volleyball season of Hannah Crews’s senior year of high school, in August, 2007 [CR 168]. Richard Galvan was fearful of being discovered at the hotel [CR 168]. Richard Galvan convinced his youth parishioner Hannah Crews to have sex with him at La Quinta Hotel in the room he had obtained [CR 168, 172]. Afterward, Hannah Crews traveled with her volleyball team to a pre-season game [CR 168, 172].

After exploiting Hannah Crews into having sex with him based on promises of emotional and spiritual healing, Hannah Crews’s mother discovered text messages between Hannah and Richard [CR 168]. Richard Galvan was confronted and told to tell his wife about the encounter [CR 168]. Richard stated that he had done so [CR 168]. Later, Hannah Crews had a conversation about the matter with Sonia Galvan, who told her it was not her fault and Richard Galvan had a problem sending, “mixed signals” to young girls [CR 168]. Soon after this, Richard and Sonia

Galvan left their positions at Northway Bible Church [CR 166]. Richard subsequently told Hannah Crews that no one would believe her if she tried to tell anyone what he had done [CR 168].

Richard Galvan subsequently visited Hannah Crews at her college during her freshmen year and tried to get her to go back a motel room with him [CR 168]. Hannah Crews refused [CR 166]. Hannah Crews subsequently learned that Richard Galvan has been inappropriate with other girls she knows [CR 169]. She believes that the potential remains for similar exploitive behavior to occur again between Richard Galvan and other girls [CR 169]. Hannah Crews is familiar with the standards in the community where Richard Galvan resides and believes that the residents of Cameron County, Texas have a public interest in preventing adults in positions of authority such as Richard from coercing and sexually exploiting and abusing young women [CR 169].

*B. BLAINE CREWS GAINS KNOWLEDGE OF THE ASSAULT AND ACTS*

Hannah Crews married Blaine Crews but never divulged the identity of the youth pastor that had exploited her until October, 2018 [CR 169]. Upon learning this news and that the individual who exploited Hannah was Richard Galvan, Blaine Crews became upset [CR 169]. Blaine Crews called Richard Galvan and confronted him on the telephone [CR 169]. Hannah Crews did not direct Blaine Crews to

make this call [CR 169]. In response to being confronted about the incidents with Hannah Crews, Richard Galvan merely responded that it happened a long time ago [CR 173]. Blaine Crews contacted two places where Richard Galvan would have contact with young girls, the Living Way Church and the Calvary School in Harlingen, Texas, and informed them of the incident with Hannah Crews [CR 173]. Hannah Crews did not contact anyone about Richard Galvan's exploitation and did not direct Blaine Crews to do so [CR 169].

*C. THE GALVANS FILE SUIT AGAINST THE CREWS'S OVER "MANIPULATION AND SEDUCTION"*

After Blaine Crews contacted the church and school, Richard and Sonia Galvan filed suit against both Blaine and Hannah Crews for defamation per se on November 5, 2018. The Galvans sought and obtained a temporary restraining order against the Crews [CR 7-25]. The Galvans also requested, but did not receive, a separate gag order [CR 11]. The Galvans' suit and request for temporary restraining order was supported by affidavits from Richard and Sonia Galvan [CR 19-24]. The Galvans' petition included claims for defamation per se brought by both Galvans and against both Blaine and Hannah Crews [CR 11]. The alleged defamatory statements that formed the basis of the Galvans claims of defamation per se were Blaine Crews's statements to the Church and School which the Galvans contended

were statements that Richard Galvan, “manipulated and seduced Hannah Crews” [CR 8-9, 19-22]. Incredibly, the Galvans’ petition and supporting affidavits did not allege that these statements were false and did not even allege that Richard Galvan did not have sex with Hannah Crews when she was in high school and he was her pastor [CR 7-25]. Likewise, the Galvans’ petition did not identify any allegedly defamatory statements against Sonia Galvan or any allegedly defamatory statements made by Hannah Crews [CR 7-25]. Despite claiming defamation per se without any allegation of false statement by Blaine Crews, the Galvans sought no less than \$335,000 in relation to their defamation per se claims against both Blaine and Hannah Crews [CR 15].

*D. THE CREWS FIGHT BACK IN SUPPORT OF THEIR CONSTITUTIONAL RIGHT TO FREE SPEECH*

Upon being served with the Galvans baseless lawsuit, the Crews filed a Rule 91a Motion to Dismiss, a motion to transfer venue and Motion to Dismiss Pursuant to Chapter 27 of the *Tex. Civ. Prac and Rem. Code* (Anti-Slapp MTD). The Crews’s 91a motion and motion to transfer venue were denied. The Crews’s Anti-Slapp MTD was filed on December 12, 2018. The motion was originally set for hearing on February 11<sup>th</sup> and subsequently moved by the Court to February 18<sup>th</sup> when the merits of the motion were heard [RR Vol 2-P1 and Vol 3-P1]. Supporting the Motion to Dismiss were the affidavits of Hannah Crews and Blaine Crews which



were considered by the trial court in their entirety and introduced without objection by Plaintiffs' counsel [RR Vol 3-P1-51].

E. THE GALVANS AMEND AND DENY ONLY "MANIPULATION AND SECUCION" IN CREWS-GALVAN CONVERSATION

Following the filing of the Crews's Anti-Slapp MTD, the Galvans filed an amended pleading supported by new affidavits on February 8, 2019 [CR 125-142]. In their amended pleading Richard Galvan offered the following affidavit testimony,

*I called Blaine Crews in response to Blaine Crews' repeated contacts with my wife, Sonia Galvan. During the conversation, Blaine Crews claimed in 2007 that I manipulated and seduced Hannah Crews. This is false. [CR139]*

The Galvans amended pleading again did not contain any allegation that Blaine Crews statements to the Church and School were false [CR 125-142]. Richard Galvan again did not deny having sex with Hannah Crews when she was seventeen and he was her pastor at Northway [CR 125-142].

F. THE CREWS' MOTION TO DISMISS IS HEARD BY THE TRIAL COURT

On February 8, 2019, the Galvans filed their response to the Crews's Anti-Slapp MTD [CR 143-145]. The three page response made the following statement, "the Court may only consider the Plaintiff's [sic] First Amended Petition and the affidavits thereto, which are hereby incorporated by reference [CR 143]. Thus, the Plaintiff's themselves asked the Court to only consider the February 8, 2019

affidavits of Richard and Sonia Galvan as the only evidence in response to the Crews's Anti-Slapp MTD. The Plaintiffs Anti-Slapp response alluded to an affidavit from Melissa-Sosa Barrera but this affidavit, originally attached to a late filed response to the Crews's Motion to Transfer Venue, was not attached or incorporated in the Galvans' response [CR 144]. The Crews's filed their affidavits in support of their Anti-Slapp MTD on February 11, 2019 [CR 166-174]. These affidavits were fully incorporated as evidence in support of the Anti-Slapp MTD by reference in an additional reply brief filed by the Crews's along with a google page showing public interest in sexual misconduct by Texas clergy [CR 181-184]. The Crews's also filed written objections to the Galvans' evidence [CR 211-212]. The Galvans filed no additional response or reply and no additional evidence. The Galvans filed no objections to the Crews's affidavits or to the Google exhibit. The trial court conducted its hearing on the Anti-Slapp MTD on February 18, 2019. At the hearing, the trial court overruled all of the Crews' evidentiary objections to the Galvans February 8, 2019 affidavits incorporated by the Galvans' response as the only evidence offered in response the Crews's Anti-Slapp MTD. During the hearing, the Trial Court announced it would allow both sides to file supplemental affidavits supporting their respective attorney's fees claims. These affidavits were filed on February 19, 2019 [CR 187-194]. No objections were made to either attorney's fee affidavit. After taking the matter under advisement, the trial court denied the Anti-

Slapp MTD by written order dated February 20, 2019 [CR 196]. The trial court signed the written order denying the Crews's objections, and confirming the denial of same at the Anti-Slapp MTD, on March 25, 2019 [CR 211-212].

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**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 2 – AFFIDAVIT OF HANNAH CREWS**

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**  
Plaintiffs,  
vs.

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**IN THE DISTRICT COURT**  
  
**CAMERON COUNTY, TEXAS**  
  
**445<sup>th</sup> JUDICIAL DISTRICT**

**BLAINE CREWS and HANNAH CREWS**  
Defendants

**AFFIDAVIT OF HANNAH CREWS IN SUPPORT OF DEFENDANTS’  
MOTION TO DISMISS**

STATE OF TEXAS §  
COUNTY OF TARRANT §

BEFORE ME, THE UNDERSIGNED NOTARY, on this day personally appeared Hannah Crews, who, being by me duly sworn, on her oath deposed and stated as follows:

1. My name is Hannah Crews. I am over 21 years of age, I am of sound mind and fully competent to make this Affidavit, and I have personal knowledge of each of the factual matters stated herein and they are true and correct.
2. I am a Defendant in the above styled case and have reviewed the Plaintiffs’ Original Petition in this case along with the Defendants’ Motion to Dismiss. I am married to Defendant Blaine Crews (“Blaine”).
3. I met both Sonia and Richard Galvan prior to my teenage years. They were part of my church, Northway Bible Church in Harlingen, TX. By the time I turned 13 years old in 2002, both Sonia and Richard started assisting in the youth group for the teenagers of the church. I sat under their leadership and mentorship as a regular youth group member and attendee until I was 17 years old, all the while going on mission trips with them and even babysitting their children. Our families were also very close friends, and we spend much time together outside of church activities.
4. In the summer of 2007, when I was 17 years old, my high school sweetheart broke up with me. It was a devastating blow to my mental and emotional well-being. In an attempt to help me get my mind off of the breakup, Richard offered me a job working for him at his business, Orbit Broadband, until I had to go back to school for my senior year at Harlingen High School. I agreed, and my parents agreed,

thinking the distraction would be good for me as well as the “Godly” mentorship and counsel I would be receiving from my youth pastor (Richard Galvan) as I worked through my emotions.

5. While I was working with Richard, he would call me back into his office almost daily to discuss my feelings and to pray over me. In each of these conversations, the topic of my physical relationship with my ex-boyfriend would be brought up by Richard. Little by little, during each of these conversations over the time span of a few weeks, he would ask further details of what I performed physically/intimately with my ex-boyfriend. After a few of these counseling sessions, I had finally divulged enough information with Richard Galvan to prove that I had been physically intimate with my boyfriend, but I was still a virgin, and had never had sex before.
6. Richard Galvan would tell me during these conversations that the reason I was so heartbroken was because of the physical attachment I had with my ex-boyfriend, and that the physical aspect of it caused me to be spiritually connected with my ex-boyfriend’s soul. On one particular day that summer, during one of these office conversations, Richard explained to me how healing happens through intimacy, even in marriages. He stated it brings closeness and understanding and heals past hurts. He would then bait me with his questions, asking, “so what do you think you need to do to move on from this pain?” Richard made me think I needed to respond with “having sex,” since he had just explained that sex brought healing. He then shook his head yes and told me that he would “help me out with this.” Richard again told me that completing this physical act of sex would heal me spiritually, since the two (physical intimacy and spirituality) were tied together. He also convinced me that since I trusted him as my mentor, it was safest to go about it this way (having sex with him instead of someone else).
7. Nothing happened that day physically between us. It still took many more conversations to convince me that having sex with him (Richard) would help me heal. I even asked him during a later conversation, “But that means you would be taking my virginity,” of which he got angry with me, stepped close to my face, and said sternly, “No, I am not taking your virginity, you are giving it to me, because you are entrusting me to help you heal.” Since I had a deep love and admiration for his wife, Sonia, I would also ask him how it was okay to do this since he was married. He convinced me, over and over, that this act would have nothing to do with Sonia and their marriage, and that this was strictly a physical action for a spiritual healing for me and me alone. But he also told me that she would never know about this, so I didn’t have to worry about this hurting her.
8. Since I was a virgin, I was also very green to sexual stimuli. During one conversation in his office, after he had convinced me that we would be completing

this act of sex at some point in the near future, he started to verbally “educate” me on sexual acts and stimulants to “get my mind prepared for that day.” He even kissed me that day and touched me as a way to show me what he was referring to. And, in my naive and manipulated and heartbroken frame of mind, I let him do it.

9. Finally, after weeks and weeks of conversation and manipulation and coercion and convincing in Mr. Galvan’s office, at the beginning of volleyball season before school started in August of 2007, I agreed to meet Richard at the La Quinta hotel in Mercedes, TX. Richard was fearful of being discovered that day, and even thought a car across the street was a hired investigator that was possibly watching us. We went upstairs, I agreed to sexual acts, and lost my virginity that day. Afterwards, I had to go to school and travel with my team to play in the first volleyball tournament of the pre-season. I was still 17 years old. And that was the first and last time I agreed to do anything physical with Richard Galvan for the rest of my life.
10. Weeks later, my mother found out about what happened with Richard after taking my phone and reading through text messages Richard was sending. She approached him about it, he came to our house, he confessed to her, and she told him to tell his wife, Sonia. I had a phone conversation with Sonia not long afterwards, and while we did not discuss details of what happened between Richard and I, Sonia then told me it was not my fault, and that Richard has a problem with sending “mixed signals” to young girls. According to Sonia, these young girls would start developing a crush on him, and he needed to work on that aspect of his “counsel.” In December, 2007, which was soon after my phone conversation with Sonia, Richard and Sonia Galvan quit as youth pastors of our church and left our church completely.
11. Since I wanted this nightmare to go away, and since my mother is also the victim of a violent rape many years ago by an unknown assailant, I begged her to not pursue any action towards Richard or his family. But I also begged her because Richard told me if I ever spoke about this with anyone, that no one would believe my story. I was intimidated by him, threatened by him, and easily submissive to him and his tactics of manipulation, even leading up to my first year in college.
12. As a freshman at Trinity University in San Antonio, Richard asked to meet up with me for food and drinks at a San Antonio restaurant to continue to apologize and make peace with the past. However, during the car ride over, I started to feel uncomfortable, because all he wanted to talk about was how Sonia wasn’t having sex with him, and he was having a hard time in their marriage. I would redirect and shut down the conversation as much as I could, especially when I felt he was trying to coerce me into talking about sexual things.

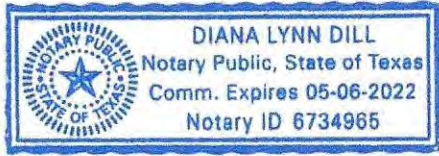
13. We ate, spoke amicably, and he dropped me back off to my dorm room. However, minutes after dropping me off, he sent me a text asking if I would go back to his hotel room with him. I angrily responded that I would not, and that I wanted him to leave me alone. Very soon after, maybe a week later, I received a dozen red roses from him. I contacted him and said that there was no reason to give me roses unless it was a romantic gesture, and that he needed to leave me alone, forever this time
14. Being that I was still so forgiving and wanted this whole nightmare to still go away, I did see Richard and his wife a couple times after this in group settings, I never made a scene or did anything about it, because my mind just kept trying to protect itself from the trauma of the memories.
15. I never brought this sexual manipulation up to my husband other than to tell him in general terms that I had been taken advantage of by a youth pastor as a young person. However, in October, 2018, I mentioned in conversation for the first time the identity of who did this to me, which was Richard Galvan. My husband Blaine became very upset. He had met Richard before and was upset that no action was taken against Richard's sick and manipulative acts.
16. After learning of Richard's identity, Blaine called Richard and Sonia on the phone. I was present in our home when Blaine called Richard and Sonia over the phone but I was not in the same room. I did not direct Blaine to call Richard and Sonia on the phone. After his call with Richard and Sonia, Blaine told me that Richard confessed to all of it. Blaine told me that he was going to inform Richard's Church and the school where his children attended of Richard's misconduct. I did not ask him to contact these institutions or take part in his communications with them.
17. Since these events occurred, I learned that Richard has not only done this to me, but he has also been inappropriate with other girls I know, who were also teenagers at the time. I never intended for the information about Richard's sexual misconduct towards me to resurface, as it is highly painful for me to relive. However, this story is true, it's disgusting, it's shameful, and all I want is to live my life freed from Richard Galvan and his manipulations. As painful as it is for me to relive this part of my life, I am concerned about Richard's behavior and potential to misbehave with other young women who are either barely into adulthood or have not reached adulthood. Having grown up in and around Harlingen, Texas, I am certainly familiar with the community standards for the area and what might be of concern for those who live in and frequent the area. It is my opinion that the residents of Cameron County, Texas certainly have a public interest in preventing adult men in positions of power from using their authority to coerce and abuse young women.



FURTHER AFFIANT SAYETH NOT

Hannah Crews  
Hannah Crews

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned authority by Hannah Crews on this the 17<sup>th</sup> day of February, 2019, to certify which witness my hand and seal of office.



Diana Lynn Dill  
Notary Public, State of Texas

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

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**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 3 – AFFDAVIT OF BLAINE CREWS**

CAUSE NO. 2018—DCL-06387-I

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

vs.

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**AFFIDAVIT AND VERIFICATION OF BLAINE CREWS IN SUPPORT OF  
DEFEDANTS' MOTION TO TRANSFER VENUE**

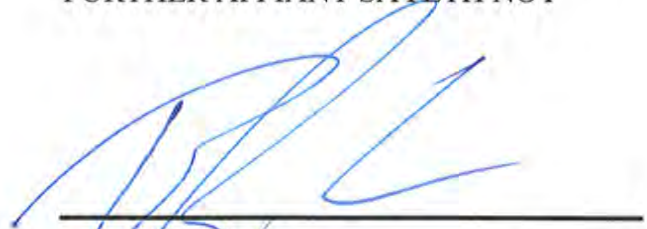
STATE OF TEXAS §  
COUNTY OF TARRANT §

BEFORE ME, THE UNDERSIGNED NOTARY, on this day personally appeared Blaine Crews, who, being by me duly sworn, on his oath deposed and stated as follows:

1. My name is Blaine Crews. I am over 21 years of age, I am of sound mind and fully competent to make this Affidavit, and I have personal knowledge of each of the factual matters stated herein and they are true and correct.
2. I am a Defendant in the above styled case and have reviewed the Plaintiffs' Original Petition in this case along with the Defendants' Motion to Transfer Venue. With respect to the allegations contained in Plaintiffs' Original Petition, I was not present or located in Cameron County during the time of any of the conduct complained of in Plaintiff's petition. All of my alleged conduct which forms the basis of Plaintiffs' claims occurred in Tarrant County, Texas. I reside in Tarrant County, Texas. The facts and arguments asserted in Defendants' Motion to Transfer Venue are true and correct and within my personal knowledge.
3. Litigating this suit in Cameron would work a severe hardship on me due to the time it will require me to spend away from my home and work. I live over five hundred miles from Cameron County and attending Court in Cameron County in this action will require an approximately eight-hour drive each way. I am self-employed and work in Tarrant County, Texas in the area of residential real estate remodeling and sales. This work requires my presence on site at various properties in Tarrant


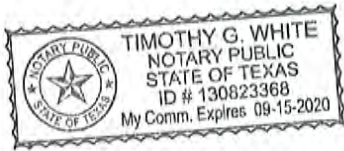
County and nearby counties. As such, I will not be able to work while traveling to and from Court proceedings in Cameron County and any extended stay in Cameron County, Texas will jeopardize my entire livelihood.

FURTHER AFFIANT SAYETH NOT



Blaine Crews

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned authority by  
Blaine Crews on this the 17 day of December, 2018, to certify which witness my  
hand and seal of office.



Notary Public, State of Texas

**CAUSE NO. 2018—DCL-06387-I**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 4 – COURT OF APPEALS OPINION – OCTOBER 10, 2019**



**NUMBER 13-19-00110-CV**

**COURT OF APPEALS**

**THIRTEENTH DISTRICT OF TEXAS**

**CORPUS CHRISTI - EDINBURG**

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**BLAINE CREWS AND HANNAH CREWS,**

**Appellants,**

**v.**

**RICHARD GALVAN AND SONIA GALVAN,**

**Appellees.**

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**On appeal from the 445th District Court  
of Cameron County, Texas.**

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**MEMORANDUM OPINION**

**Before Chief Justice Contreras and Justices Longoria and Perkes  
Memorandum Opinion by Chief Justice Contreras**

In this interlocutory appeal, appellants Blaine Crews and Hannah Crews (the Crewses) appeal the trial court's denial of their motion to dismiss a defamation per se claim brought by appellees Richard Galvan and Sonia Galvan (the Galvans). By four issues, which we treat as two, the Crewses argue that: (1) the trial court erred when it

denied their motion to dismiss, and (2) they are entitled to attorney's fees. We reverse the trial court's denial of the Crewses' motion to dismiss and remand for the trial court to enter an order dismissing the Galvans' defamation per se claim and for further proceedings consistent with this memorandum opinion.

## I. BACKGROUND<sup>1</sup>

According to the Crewses, when Hannah was seventeen years old, she attended the Northway Bible Church in Harlingen, Texas, where Richard was a youth minister and pastor. Hannah had been active in the church's youth group and had known Richard and his wife Sonia since she was twelve years old. During the summer between her junior and senior year of high school, Hannah and her high school boyfriend broke up. Hannah was heartbroken, and Richard offered her a job at his business and to counsel her through her emotional grief. While Hannah was working at his business, Richard would call her into his office "almost daily" to discuss her feelings and to pray over her. During these conversations, Richard repeatedly brought up the extent of Hannah's physical relationship with her ex-boyfriend. Richard told Hannah that the reason she was heartbroken was because of the physical attachment she had developed with her ex-boyfriend and "that the physical aspect of it caused [her] to be spiritually connected to [her] ex-boyfriend's soul." Richard explained to Hannah that the way to heal from her break up was through intimacy. According to Hannah:

[Richard] would then bait me with his questions, asking, 'so what do you think you need to do to move on from this pain?' Richard made me think I needed to respond with 'having sex,' since he had just explained that sex brought healing. He then shook his head yes and told me that he would 'help me out with this.' Richard again told me that completing this physical act of sex would heal me spiritually, since the two (physical intimacy and spirituality) were tied together. He also convinced me that since I trusted

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<sup>1</sup> The following is taken from the parties' pleadings and affidavits.

him as my mentor, it was safest to go about it this way (having sex with him instead of someone else).

Nothing happened that day physically between us. It still took many more conversations to convince me that having sex with him (Richard) would help me heal. I even asked him during a later conversation, "But that means you would be taking my virginity," of which he got angry with me, stepped close to my face, and said sternly, "No, I am not taking your virginity, you are giving it to me, because you are entrusting me to help you heal." Since I had deep love and admiration for his wife Sonia, I would also ask him how it was okay to do this since he was married. He convinced me, over and over, that this act was a strictly physical action for a spiritual healing for me and me alone. But he also told me that she would never know about this, so I didn't have to worry about this hurting her.

.....

Finally, after weeks and weeks of conversation and manipulation and coercion and convincing in Mr. Galvan's office, at the beginning of volleyball season before school started in August of 2007, I agreed to meet Richard at the La Quinta hotel in Mercedes, TX. Richard was fearful of being discovered that day, and even thought a car across the street was a hired investigator that was possibly watching us. We went upstairs, I agreed to sexual acts, and lost my virginity that day. Afterwards, I had to go to school and travel with my team to play in the first volleyball tournament of the pre-season. I was still 17 years old. And that was the first and last time I agreed to do anything physical with Richard Galvan for the rest of my life.

Shortly after, Hannah's mother found out that Richard had sex with Hannah.

Richard came to Hannah's house, confessed to Hannah's mother about it, and Hannah's mother told Richard to tell his wife. Hannah subsequently had a phone conversation with Sonia about it. Hannah insisted she did not want to press criminal charges because "Richard told me if I ever spoke about this with anyone, that no one would believe my story." In December 2007, shortly after Hannah's phone conversation with Sonia, Richard and Sonia quit as youth pastors and left the church completely. According to Hannah, she later learned that Richard had also been inappropriate with other girls she knew and that the other girls were also teenagers at the time of their interactions with Richard.



Years later, Hannah married Blaine, and she shared with him that she had been taken advantage of by her youth pastor but did not disclose the identity of the individual. In October 2018, Hannah told Blaine for the first time that the pastor was Richard. After learning of Richard's identity, Blaine became very upset and obtained Sonia's cell phone number and texted her.<sup>2</sup> Richard called him back almost immediately. Blaine was concerned that Richard may "still be associating himself with youth and placing himself in a position to take advantage of other young women under his authority." According to Blaine, during his conversation with Richard, Richard acknowledged that the events Blaine recounted about Richard's sexual relationship with Hannah were true. Blaine told Richard and Sonia that he was concerned about Richard being around young women and that people needed the information about his interactions with Hannah to determine whether Richard should be around their daughters. According to Richard, "Blaine Crews . . . expressed that since Hannah Crews' father never did anything in 2007, that Blaine Crews would do something about the alleged seduction and manipulation and would have used a bullet to do it." Blaine also informed Richard that he intended to contact Richard's church and the school of Richard's children, where Blaine believed he associated with young women. Blaine subsequently called Richard's church and the school of Richard's children and informed them of Richard's history and past conduct towards Hannah.

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<sup>2</sup> According to the Galvans' petition, Blaine messaged Sonia over Facebook demanding to speak with Richard and Sonia. Sonia states in her affidavit that she received a Facebook message from Blaine asking for her phone number. Hannah states in her affidavit that Blaine called Richard and Sonia on the phone. In his affidavit, Richard states that he "called Blaine Crews in response to Blaine Crews' repeated contacts with my wife, Sonia Galvan."

The Galvans filed suit against the Crewses. In their first amended original petition, Richard and Sonia pleaded causes of action for assault, intentional infliction of emotional distress, defamation per se, and public disclosure of private facts. In their amended petition, the Galvans stated that “Blaine Crews text[ed] Plaintiff Sonia Galvan and claimed that Plaintiff Richard Galvan, seduced and manipulated Hannah Crews in 2007. These allegations are false.” The Galvans further alleged that Blaine told Richard that: “he would have put a bullet” in Richard’s head “if Defendant Blaine Crews knew Defendant Hannah Crews in 2007”; the “phone call would not be the end”; Richard’s children “would learn as well”; and that Richard will find out what Blaine “is going to do to him.”

The Crewses filed a motion to dismiss the Galvans’ defamation per se claim pursuant to the Texas Citizen Participation Act (TCPA), and the Galvans filed a response in opposition. See TEX. CIV. PRAC. & REM. CODE ANN. § 27.001 *et seq.* Both parties submitted affidavits in support of their motions. The Galvans submitted an affidavit by Richard that stated: “I called Blaine Crews in response to Blaine Crews’ repeated contacts with my wife, Sonia Galvan. During the conversation, Blaine Crews claimed in 2007 that I manipulated and seduced Hannah Crews. This is false.” The Crews objected to Richard’s affidavit on the ground that it was conclusory, but the trial court overruled the objection and denied the Crewses’ motion to dismiss. This interlocutory appeal followed. See *id.* § 51.014(12).

## II. THE ANTI-SLAPP STATUTE

The Texas Legislature enacted the TCPA, “to encourage and safeguard the constitutional rights of persons to petition, speak freely, associate freely, and otherwise participate in government to the maximum extent permitted by law and, at the same time,

protect the rights of a person to file meritorious lawsuits for demonstrable injury.”<sup>3</sup> *Id.* § 27.002. It protects citizens from retaliatory lawsuits that seek to intimidate or silence them on matters of public concern, i.e., “Strategic Lawsuits Against Public Participation,” commonly known as SLAPP suits, by providing a mechanism for summary disposition of such suits. *In re Lipsky*, 460 S.W.3d 579, 584 (Tex. 2015) (orig. proceeding).

The TCPA provides a two-step procedure for early dismissal of claims brought to intimidate or to silence a defendant’s exercise of First Amendment rights. See TEX. CIV. PRAC. & REM. CODE ANN. §§ 27.003, 27.005; *ExxonMobil Pipeline Co. v. Coleman*, 512 S.W.3d 895, 898 (Tex. 2017) (per curiam). Under the first step, the movant seeking dismissal under the TCPA has the burden to show by a preponderance of the evidence that the nonmovant’s legal action is based on, relates to, or is in response to the movant’s exercise of the right of free speech, the right to petition, or the right of association. TEX. CIV. PRAC. & REM. CODE ANN. § 27.005(b). If the movant makes this showing, the burden shifts to the nonmovant to establish by “clear and specific evidence a prima facie case” for each essential element of the claim in question. *Id.* § 27.005(c).

### III. STANDARD OF REVIEW

We review a trial court’s ruling on a TCPA motion to dismiss de novo. *Tyler v. Pridgeon*, 570 S.W.3d 392, 396 (Tex. App.—Tyler 2019, no pet.); *Lane v. Phares*, 544 S.W.3d 881, 886 (Tex. App.—Fort Worth 2018, no pet.). Specifically, we consider de novo whether each party has met its respective burden under the TCPA’s two-step dismissal mechanism. *Tyler*, 570 S.W.3d at 396. In our review, we consider the

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<sup>3</sup> The TCPA was recently amended, effective September 1, 2019. See Act of May 17, 2019, 86th Leg., R.S., ch. 378, §§ 1–9, 12 (codified at TEX. CIV. PRAC. & REM. CODE ANN. §§ 27.001, 27.003, 27.005–.007, 27.0075, 27.009–.010). The amendments do not apply to this case, which was filed before the amendments’ effective date. See *id.* §§ 11–12.

pleadings and supporting and opposing affidavits stating the facts on which the liability or defense is based. TEX. CIV. PRAC. & REM. CODE ANN. § 27.006(a); *Campbell v. Clark*, 471 S.W.3d 615, 623 (Tex. App.—Dallas 2015, no pet.). We view the pleadings and the evidence in the light most favorable to the nonmovant when determining whether the TCPA applies. *Tyler*, 570 S.W.3d at 36.

#### IV. DISCUSSION

##### A. The First Prong—Right of Free Speech

The Crewses filed a motion to dismiss, and it was their burden initially to show that the complained of communication was an exercise of Blaine’s right to free speech. See TEX. CIV. PRAC. & REM. CODE ANN. § 27.005(b). The TCPA defines “exercise of the right of free speech” as “a communication made in connection with a matter of public concern,” *id.* § 27.001(3), and then defines both “communication” and “matter of public concern.” See *id.* § 27.001(1), (7). A “communication” includes the making or submitting of a statement or document in any form or medium, including oral, visual, written, audiovisual, or electronic. *Id.* § 27.001(1). A “matter of public concern” includes an issue related to: (A) health or safety; (B) environmental, economic, or community well-being; (C) the government; (D) a public official or public figure; or (E) a good, product, or service in the market place. *Id.* § 27.001(7). The legislature expressed its intent that the statute be construed liberally. *Id.* § 27.011(b). Under this statutory framework, if the message “was made in connection with” an issue related to health or safety or community well-being, it would fall squarely within the statute. See *id.* § 27.001(1), (3), (7)(A)–(B).

Whether speech is a matter of public concern is a question of law. *Connick v. Myers*, 461 U.S. 138, 148 n.7 (1983); *Klantzman v. Brady*, 456 S.W.3d 239, 257 (Tex.

App.—Houston [1st Dist.] 2014), *aff'd*, 515 S.W.3d 878 (Tex. 2017). Matters of public concern include, among other things, the commission of a crime. *Klentzman*, 515 S.W.3d at 884 (citing *Cox Broadcasting Corp. v. Cohn*, 420 U.S. 469, 492 (1975)); see *Coleman*, 512 S.W.3d at 900; *Campbell*, 471 S.W.3d at 624; see also *Cummins v. Bat World Sanctuary*, No. 02-12-00285-CV, 2015 WL 1641144, at \*10 & n.77 (Tex. App.—Fort Worth Apr. 9, 2015, pet. denied) (mem. op.).

Here, Blaine communicated that: Richard had sex with Hannah when she was seventeen years old and prior to her senior year of high school; Richard was her youth minister and pastor; Richard sexually seduced Hannah under the pretense of spiritual healing; Richard offered Hannah help to heal spiritually and emotionally after her break up with her high school boyfriend; and Richard told Hannah she was entrusting him to help her heal by giving him her virginity. Under the Texas Penal Code, a sexual assault occurs if “the actor is a clergyman<sup>4</sup> who causes the other person to submit or participate by exploiting the other person’s emotional dependency on the clergyman in the clergyman’s professional character as spiritual adviser.” TEX. PENAL CODE ANN. § 22.011(b)(10) (defining sexual assault by a clergyman); see also, e.g., *Hornbuckle v. State*, No. 02-06-00316-CR, 2008 WL 2168007, at \*3–4 (Tex. App.—Fort Worth May 22, 2008, pet. ref’d) (mem. op., not designated for publication) (analyzing the sufficiency of the evidence on the issue of clergyman-induced consent when bishop came to victim’s

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<sup>4</sup> A clergyman is a minister, priest, rabbi, accredited Christian Science Practitioner, or other similarly functionary of a religious organization or an individual reasonably believed so to be by the person consulting him or her. *Simpson v. Tennant*, 871 S.W.2d 301, 303 (Tex. App.—Houston [14th Dist.] 1994, no writ) (citing TEX. R. EVID. 505); *Nicholson v. Wittig*, 832 S.W.2d 681, 684 (Tex. App.—Houston [1st Dist.] 1992, no writ) (same). The Galvans do not dispute that Richard was a clergyman under this definition.

house “to comfort her” and induced her into having sex). In such a scenario a person is legally unable to consent to sex. See TEX. PENAL CODE ANN. § 22.011(b)(10).

Hannah and Blaine’s affidavits provide that Richard caused Hannah to submit to his sexual advances by exploiting her emotional dependence on him as her spiritual advisor. Thus, the statements complained of here concern alleged criminal conduct; therefore, the statements were made in connection with a matter of public concern. See *Brady*, 515 S.W.3d at 884; *Campbell*, 471 S.W.3d at 624; *Doe v. Mobile Video Tapes, Inc.*, 43 S.W.3d 40, 59 (Tex. App.—Corpus Christi—Edinburg 2001, no pet.) (“The possible commission of a crime and the resulting consequences are events of legitimate public concern.”); see also *Cummins*, 2015 WL 1641144, at \*10 (noting that animal cruelty can be a matter of public concern because the penal code makes animal cruelty a criminal offense).

Furthermore, according to Hannah, since the alleged incidents between her and Richard occurred, she learned that Richard had “also been inappropriate with other girls [that Hannah knows], who were also teenagers at the time.” The statements by Blaine that the Galvans complain of relate to the safety, health, and well-being of the community because Richard is around to teenage women at his church and at his children’s school,<sup>5</sup> and the type of coercion, manipulation, and abuse of power alleged by the Crewses could be repeated as a result of his interaction with young women at both institutions. See *Backes v. Misko*, 486 S.W.3d 7, 18 (Tex. App.—Dallas 2015, pet. denied); *Campbell*, 471 S.W.3d at 623–24; see also *Cummins*, 2015 WL 1641144 at \*10; *Nguyen v. Dallas*

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<sup>5</sup> According to an affidavit from Melissa Barrera-Sosa, the executive assistant employed by the Galvans’ church, Blaine expressed concern that Richard might pose a danger to other young women because Richard has a daughter who might bring friends home.

*Morning News, L.P.*, No. 02-06-00298-CV, 2008 WL 2511183, at \*5 (Tex. App.—Fort Worth June 19, 2008, no pet.) (mem. op.) (“Protection of children from abuse is of the utmost importance in Texas.”). Blaine states as much in his affidavit: “Both of the institutions that I contacted are places where Richard has access to associate with young women who might also be subjected to the same type of misconduct.” Clearly, sexual misconduct involving young vulnerable individuals are matters of public concern as they relate to health, safety, and community well-being, all included in the definition of “matters of public concern” under the TCPA. See TEX. CIV. PRAC. & REM. CODE ANN. § 27.001(7); *Hersh v. Tatum*, 526 S.W.3d 462, 468 (Tex. 2017). We conclude that a preponderance of the evidence shows that Blaine’s communication was “a communication made in connection with a matter of public concern,” and thus, an exercise of his right of free speech. See TEX. CIV. PRAC. & REM. CODE ANN. § 27.001(3), (7)(A)–(B).

The Galvans argue that, because the ten-year statute of limitations for the alleged offense had passed at the time of Blaine’s statements, see TEX. CODE CRIM. PROC. ANN. art. 12.01(2)(E) (providing ten-year statute of limitations for sexual assault), the statements are no longer a matter of public concern. We disagree. The purpose of a statute of limitations is to limit exposure to criminal prosecution to a certain fixed period of time following the occurrence of those acts the legislature has decided to punish by criminal sanctions. *U.S. v. Tavaréz-Levario*, 788 F.3d 433, 437 (5th Cir. 2015) (quoting *Toussie v. U.S.*, 397 U.S. 112, 114–15 (1970)). Such a limitation is designed to protect individuals from having to defend themselves against criminal charges when the basic facts may have become obscured by the passage of time and to minimize the danger of official punishment because of acts in the far-distant past. *Id.* Thus, the purpose of the

statute of limitations is not conclusive on whether certain communications relate to a matter of public concern. See TEX. CIV. PRAC. & REM. CODE ANN. §§ 27.001(7), 27.011(b); *Tavarez-Levario*, 788 F.3d at 437. In other words, the bar to prosecution of an alleged offense due to the expiration of the statute of limitations does not by itself mean that the alleged crime is no longer a matter of public concern. See TEX. CIV. PRAC. & REM. CODE ANN. §§ 27.001(7), 27.011(b); *Tavarez-Levario*, 788 F.3d at 437. Furthermore, the Texas Penal Code provides that a convicted sex offender must register with the State’s sex-offender registry for ten years after “the court dismisses the criminal proceedings . . . , the person is released from a penal institution, or the person discharges community supervision, whichever is later.” TEX. CODE CRIM. PROC. ANN. art. 62.101(c)(2); see also *id.* art. 62.001(5)(A) (providing that a “reportable conviction or adjudication” for purposes of the sex-offender registration program includes sexual assault); TEX. PENAL CODE ANN. § 22.011(b)(10). This indicates that, contrary to the Galvans argument, a sexual assault offense is a matter of public concern beyond the ten-year period provided by the statute of limitations.

While we do not decide whether all alleged crimes are matters of public concern in perpetuity, we conclude that the alleged crime here continues to be a matter of public concern based on the factual allegations made by the Crewses.

**B. The Second Prong—Clear and Specific Evidence**

Having determined that Richard’s defamation claim relates to Blaine’s exercise of his right to free speech, we next consider whether the Galvans established “by clear and specific evidence a prima facie case for each essential element” of his claim. TEX. CIV.



PRAC. & REM. CODE ANN. § 27.005(c). To make this determination, we are to consider the pleadings and any supporting and opposing affidavits. *Id.* § 27.006(a).

While the TCPA does not define the phrases “clear and specific evidence” and “prima facie case,” these terms have been defined by case law. “Clear” has been defined as “unambiguous, sure, or free from doubt,” and “specific” is defined as explicit or relating to a particular named thing. *In re Lipsky*, 460 S.W.3d at 590. “Prima facie case” refers to evidence sufficient as a matter of law to establish a given fact if it is not rebutted or contradicted. *Id.* It is the minimum quantum of evidence necessary to support a rational inference that the allegation of fact is true. *Id.* Accordingly, to avoid dismissal of a defamation claim under the TCPA, a plaintiff must present pleadings and evidence that establish the facts of when, where, and what was said, the defamatory nature of the statements, and how they damaged the plaintiff. *Campbell*, 471 S.W.3d at 624 (citing *In re Lipsky*, 460 S.W.3d at 591). “Conclusory statements are not probative and accordingly will not suffice to establish a prima facie case.” *Better Bus. Bureau of Metro Hous., Inc. v. John Moore Servs., Inc.*, 441 S.W.3d 345, 355 (Tex. App.—Houston [1st Dist.] 2013, pet. denied); see also *In re Lipsky*, 460 S.W.3d at 592 (explaining that “bare, baseless opinions” are not “a sufficient substitute for the clear and specific evidence required to establish a prima facie case” under the TCPA).

The elements of defamation are: (1) the publication of a false statement of fact to a third party, (2) that was defamatory concerning the plaintiff, (3) with the requisite degree of fault, and (4) damages, in some cases. *In re Lipsky*, 460 S.W.3d at 593. The status of the person allegedly defamed determines the requisite degree of fault. *Id.* A private individual need only prove negligence, whereas a public figure or official must prove

actual malice. *Id.* Finally, the plaintiff must plead and prove damages, unless the defamatory statements are defamatory per se. *Id.* Defamation per se refers to statements that are so obviously harmful that general damages may be presumed. *Id.*

The Galvans allege that Blaine's statements are defamatory per se. We agree. See *id.* (stating that "[a]ccusing someone of a crime, of having a foul or loathsome disease, or of engaging in serious sexual misconduct are examples of defamation per se"). Therefore, to determine whether Richard's defamation action survived Blaine's TCPA motion to dismiss, we look only for clear and specific evidence as to the first and third elements.

As to the third element, whether the publication was made with the requisite degree of fault, Richard's status as a private individual determines the degree of fault to be applied in this case. See *In re Lipsky*, 460 S.W.3d at 593. Because Richard was a private individual,<sup>6</sup> rather than a public figure or official, Richard needed to present clear and specific evidence that Blaine was negligent. See *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 571 (Tex. 1998) (explaining that private plaintiff must prove only that the defendant "was at least negligent," whereas a public official or public figure must establish actual malice, which is a higher degree of fault than negligence); *Van Der Linden*, 535 S.W.3d at 200.

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<sup>6</sup> Neither party argued at the trial court or on appeal that Richard is a public-figure plaintiff. Whether an individual is a public official, a public figure, or an involuntary public figure is a question of law. See *Neely v. Wilson*, 418 S.W.3d 52, 70 (Tex. 2013); *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 571 (Tex. 1998). Generally, elected officials and candidates for elected office are considered public officials. See *Huckabee v. Time Warner Entm't Co.*, 19 S.W.3d 413, 420 (Tex. 2000); *Casso v. Brand*, 776 S.W.2d 551, 554 (Tex. 1989). Public figures can be all purpose public figures, limited-purpose public figures, and involuntary public figures. *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 345 (1974); see *McLemore*, 978 S.W.2d at 571. Richard is not an elected official or a candidate for office, and there is nothing in the record indicating he has achieved fame or notoriety or become involved in a particular public controversy making him any other public figure type. See *Neely*, 418 S.W.3d at 70; *WFAA-TV, Inc.*, 978 S.W.2d at 571. Therefore, we conclude that Richard is a private figure for the purpose of this litigation.

Negligence in a defamation action requires the plaintiff to show (1) the defendant knew or should have known the defamatory statement was false and (2) the content of the publication would warn a reasonably prudent person of its defamatory potential. See *Foster v. Laredo Newspapers, Inc.*, 541 S.W.2d at 809, 819–20 (Tex. 1976); *Scripps Tex. Newspapers, L.P. v. Belalcazar*, 99 S.W.3d 829, 837 (Tex. App.—Corpus Christi—Edinburg 2004, pet. denied); see *D Magazine Partners*, 529 S.W.3d at 440. Negligent conduct is determined by asking whether the defendant acted reasonably in checking the truth of the communication before publishing it. *Scripps Tex. Newspapers*, 99 S.W.3d at 837; see, e.g., *D Magazine Partners*, 529 S.W.3d at 440; *Newspaper Holdings, Inc. v. Crazy Hotel Assisted Living, Ltd.*, 416 S.W.3d 71, 85–86 (Tex. App.—Houston [1st Dist.] 2013, pet. denied).

Our review of the record reveals no allegations or assertions by the Galvans that Blaine was negligent. The Galvans never argued before the trial court—nor do they present any argument on appeal—that Blaine was negligent when he communicated the disputed statements. Moreover, the Galvans have never asserted that Blaine knew or should have known his statements were false. On the contrary, the pleadings and affidavits by both parties indicate the opposite—Blaine learned of the underlying facts from his wife and then contacted Richard and Sonia to ask them about those facts. According to Blaine’s affidavit, Richard admitted to him that the allegations were true. Hannah’s affidavit states that Richard admitted to Hannah’s mom that they had sex. Nowhere in their petition or in their affidavits do the Galvans state that they informed Blaine that any of the underlying statements were false, or that Blaine knew or should have known they were false. Therefore, Blaine was not negligent. See *Newspaper*

*Holdings, Inc.*, 416 S.W.3d at 85–86; *cf. D Magazine Partners*, 529 S.W.3d at 440. Accordingly, the Galvans have failed to establish a prima facie case as to every element of their defamation action, and the claim must be dismissed under the TCPA. See TEX. CIV. PRAC. & REM. CODE ANN. § 27.005.

We sustain the Crewses' first issue.

#### **V. ATTORNEY'S FEES**

By their second issue, the Crewses argue that we should remand to the trial court for an award of attorney's fees. We agree. Section 27.009 of the Texas Civil Practice and Remedies Code mandates that if an action is dismissed under the TCPA, the trial court "shall award to the moving party court costs, reasonable attorney's fees, and other expenses incurred in defending against the legal action as justice and equity may require." TEX. CIV. PRAC. & REM. CODE ANN. § 27.009(a)(1); *Sullivan v. Abraham*, 488 S.W.3d 294, 295, 299 (Tex. 2016) (stating that "the TCPA requires an award of 'reasonable attorney's fees' to the successful movant"). A "reasonable" attorney's fee "is one that is not excessive or extreme, but rather moderate or fair." *Sullivan*, 488 S.W.3d at 299. "That determination rests within the court's sound discretion, but that discretion, under the TCPA, does not also specifically include considerations of justice and equity." *Id.* Because the trial court has not yet had the opportunity to determine the amount of court costs, attorney's fees, and other expenses that should be awarded to the Crewses, we remand the case to the trial court to make that determination.

We sustain the Crewses' second issue.

## **VI. MOTIONS FOR SANCTIONS**

During the pendency of this appeal, both parties filed motions for sanctions, and the Crewses filed a motion asking us to reconsider our denial of oral argument and to issue findings of fact and conclusions of law regarding our denial of oral argument. In addition, the Galvans filed a motion for leave to file consolidated responses to the Crewses' motions. We grant the Galvans' motion for leave. We deny the motions for sanctions filed by both parties and the motions filed by the Crewses.

## **VII. CONCLUSION**

We reverse the trial court's denial of the Crewses' motion to dismiss and remand the case for the trial court to enter an order dismissing the Galvans' defamation per se claim and for further proceedings consistent with this memorandum opinion.

DORI CONTRERAS  
Chief Justice

Delivered and filed the 10th  
day of October, 2019.

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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§  
§

**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 5 – Richard Galvan Interrogatories**

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS  
Defendants**

§  
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§

**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**DEFENDANTS' FIRST SET OF WRITTEN INTERROGATORIES, FIRST REQUEST  
FOR ADMISSION FIRST REQUEST FOR ADMISSION AND FIRST REQUEST FOR  
PRODUCTION TO PLAINTIFF RICHARD GALVAN**

Please take notice that foregoing requests are hereby made pursuant to Tex. R. Civ. P. 196, 197 and 198. No later than thirty days after service of these requests, Plaintiffs shall file a written response to each request and provide documents responsive to the requests for production contained herein unless said request is objected to, in which event the all reasons for the objection shall be stated.

Respectfully Submitted,

/s/ C. Davis Chapman

C. Davis chapman

State Bar No. 00798101

P.O. Box 387

Fort Worth, Texas 76101

(817) 781-0211

(682) 334-7306 - Facsimile

ATTORNEY FOR DEFENDANTS

Email: [c.davis.chapman@gmail.com](mailto:c.davis.chapman@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on the below listed counsel of record as indicated below on this 23<sup>rd</sup> day of January, 2020.

Travis L. Bence  
Jim Young  
1018 East Tyler  
Harlingen, Texas 78550

via electronic service

/s/ C. Davis Chapman

**INTERROGATORIES**

INTERROGATORY NUMBER 1:

Did Richard Galvan have sexual relations with Defendant Hannah Crews, formerly known as Hannah Linn, on or around August, 2007?

ANSWER:

INTERROGATORY NUMBER 2:

Please state the approximate date and location of each time Richard had sexual relations with Defendant Hannah Crews.

ANSWER:

INTERROGATORY NUMBER 3:

Please state the dates of any periods in which Richard Galvan, or any business which Richard Galvan owned or was employed with, also employed Defendant Hannah Crews for the years 2005 to 2010.

ANSWER:

INTERROGATORY NUMBER 4:

Please identify each church you attended and all positions held with each such church for the years 2005 to the present.

ANSWER:



INTERROGATORY NUMBER 5:

Please identify any activities for in which you have actively associated with, supervised and/or sponsored young people for the years 2010 to the present including, but not limited to, school activities, school sponsored extracurricular activities, sports activities or teams, youth sports, church youth groups, scouting or other youth organizations,

ANSWER:

INTERROGATORY NUMBER 6:

Please identify any role you had with the Northway Bible Church in Harlingen Texas and years of such involvement with the church youth group.

ANSWER:

INTERROGATORY NUMBER 7:

Please identify each allegedly private fact which is the subject of this lawsuit by providing the speaker or publisher of the statement, the date of the statement, the party to which it was made and the contents of allegedly defamatory statement or a summary of your understanding of the statement.

ANSWER:

INTERROGATORY NUMBER 8:

Please identify the date on which you communicated to any third party that you had engaged in sexual relations with Hannah Crews formerly known as Hannah Linn.

ANSWER:

INTERROGATORY NUMBER 9:

Please identify any economic damages you contend you suffered with respect the public disclosure of private facts alleged in your original and amended Petitions in this case.

ANSWER:

INTERROGATORY NUMBER 10:

Please identify any medical or psychological treatment sought by you which you contend were proximately caused by the acts of Blaine or Hannah Crews as alleged in your original or amended petition.

ANSWER:

INTERROGATORY NUMBER 11:

Please identify each conversation in which you contend that either Defendant committed an assault by threat and identify the date of such conversation, the parties to the conversation, the substance of the conversation including the threat made and the location of the parties at the time of each such conversation.

ANSWER:

INTERROGATORY NUMBER 12:

Please identify each allegedly private fact which is the subject of this lawsuit by providing the speaker or publisher of the statement, the date of the statement, the party to which it was made and the contents of allegedly defamatory statement or a summary of your understanding of the statement.

ANSWER:

INTERROGATORY NUMBER 13:

Please identify each act or omission of either Defendant upon which you base your claim of intentional infliction of emotional distress by providing a description of said act or omission and the date on which it occurred.

ANSWER:

INTERROGATORY NUMBER 14:

Please identify any claims of sexual misconduct or sex based criminal offenses which have been made against you and state the date for same and the person making such allegation.

ANSWER:

INTERROGATORY NUMBER 14:

Please identify each company, limited liability company, limited partnership, joint venture, partnership or other business entity in which you have an ownership interest and provide the name of each such entity and the type and percentage of ownership interest which you own

ANSWER:

INTERROGATORY NUMBER 15:

Please state your net worth as of October 10, 2019 and identify any individuals or entities which assisted you in providing the amount stated.

ANSWER:

INTERROGATORY NUMBER 16:

Please state when you first reviewed the affidavits filed by Blaine and Hannah Crews in this case and, with respect the affidavits, identify each statement you contend is inaccurate and provide a brief statement concerning the basis for your disagreement regarding each such statement.

ANSWER:

INTERROGATORY NUMBER 17:

Please identify each lawsuit to which have been a party for the years 2005 to the present by stating the cause number, style of the case, the county and court in which it was filed, whether you were a Plaintiff or Defendant and the type of case.

ANSWER:

INTERROGATORY NUMBER 18:

During the years from 2005 to the present, identify each person with which you have had sexual relations other than your wife, Sonia Galvan by stating their name, address and phone number and identifying the dates during which you were engaging in sexual relations with them.

ANSWER:

INTERROGATORY NUMBER 19:

Please identify any sex related website for which you have maintained a membership or login during the years 2005 to the present by stating the name of the website, your member name and the dates which you maintained such membership.

ANSWER:

INTERROGATORY NUMBER 20:

Please identify any payments of money you made to Hannah Crews, formerly known as Hannah Linn during the years from 2005 to the present.

ANSWER:

INTERROGATORY NUMBER 21:

Identify any occasion in which you provided counseling or pastoral support to Hannah Crews, formerly known as Hannah Linn during the years from 2005 to the present and state the date and subject of each such session.

ANSWER:

INTERROGATORY NUMBER 22:

Identify all church youth activities you attended in which Hannah Crews, formerly known as Hannah Linn, was also present during the years 2005 – 2013.

ANSWER:

### **REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 1

Admit that Richard Galvan has had sexual relations with Defendant Hannah Crews formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 2:

Admit that Richard Galvan has had sexual intercourse with Hannah Crews, Crews formerly known as Hannah Linn, including vaginal penetration.

REQUEST FOR ADMISSION NO. 3

Admit that Richard Galvan worked with Defendant Hannah Crews in 2007.

REQUEST FOR ADMISSION NO. 4

Admit that Richard Galvan was the supervisor of Hannah Crews, formerly known as Hannah Linn, in 2007.

REQUEST FOR ADMISSION NO. 5

Admit that you assisted with the church youth group at Northway Bible Church in Harlingen Texas.

REQUEST FOR ADMISSION NO. 6

Admit that Plaintiffs hired Hannah Crews, formerly known as Hannah Linn, to babysit your children.

REQUEST FOR ADMISSION NO. 7

Admit that Richard Galvan paid for a hotel room at the La Quinta Inn in Mercedes, Texas in 2007 and had sex with Defendant Hannah Crews, formerly known as Hannah Linn, in that room.

REQUEST FOR ADMISSION NO. 8

Admit that Richard Galvan acknowledged to Blaine Crews in 2018 that he had previously engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 9

Admit that Richard Galvan has previously acknowledged to Starla Linn that he had engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 10

Admit that Richard Galvan has previously acknowledged to Sonia Galvan that he had engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 11

Admit that the statement, "Blaine Crews then explained he would have put a bullet in Richard Galvan's head if Blaine Crews knew Hannah Crews in 2007," is true and correct and within your personal knowledge.

REQUEST FOR ADMISSION NO. 12

Admit that during your October 21, 2018 telephone conversation with Richard Galvan and Blaine Crews, you were aware that Blaine Crews lived in Fort Worth, Texas.

REQUEST FOR ADMISSION NO. 13

Admit that during the period from 2005 to 2017, you have solicited the services of prostitutes on one or more occasions.

## REQUESTS FOR PRODUCTION

### REQUEST FOR PRODUCTION NO. 1

Please produce copies of any diaries or journals you kept in 2007 – 2019.

### REQUEST FOR PRODUCTION NO. 2

Please produce copies of your phone bills for the year 2018.

### REQUEST FOR PRODUCTION NO. 3

Please produce copies of any internet chat sessions, private messages or emails between you and either Defendant in this case.

### REQUEST FOR PRODUCTION NO. 4

Please produce copies of any internet chat sessions, private messages or emails between you and any person concerning the acts which form the basis of your claims in this case.

### REQUEST FOR PRODUCTION NO. 5

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

### REQUEST FOR PRODUCTION NO. 6

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

### REQUEST FOR PRODUCTION NO. 7

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

### REQUEST FOR PRODUCTION NO. 8

Please produce any photographs, illustrations, videos or drawings which are related to the acts forming the basis for your claims in this case.

### REQUEST FOR PRODUCTION NO. 9

Please produce any pictures or videos of Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR PRODUCTION NO. 10

Please produce any pictures or videos of the family of Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR PRODUCTION NO. 11

Please produce copies of any documents you have related to your church activities in years 2005-2008.

REQUEST FOR PRODUCTION NO. 12

Please produce copies of any correspondence between you and Blaine Crews.

REQUEST FOR PRODUCTION NO. 13

Please produce copies of any correspondence between you and any third party concerning the acts which form the basis of your claims in this case.

REQUEST FOR PRODUCTION NO. 14

Please produce copies of any correspondence between you and Hannah Crews, formerly known as Hannah Linn, in your possession, custody or control.

REQUEST FOR PRODUCTION NO. 15

For any entity identified in Interrogatory No. 14 above, please produce each such entities articles of incorporation, company agreement, bylaws, corporate minutes and organizational chart.

REQUEST FOR PRODUCTION NO. 15

Please produce copies of any written calculations of your net worth completed in 2019.

REQUEST FOR PRODUCTION NO. 16

Please produce your income tax return for the year 2019.

REQUEST FOR PRODUCTION NO. 17

Please produce any expert reports or notes which have been reviewed by a testifying expert in this case.

REQUEST FOR PRODUCTION NO. 18

Please produce any documents you reviewed in preparing your affidavits which have been filed in this case.

REQUEST FOR PRODUCTION NO. 19

Please produce any documents, awards or certificates related to positions you have held in your church for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 20

Please produce any documents, awards or certificates related to any youth organizations or activities you have participated in for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 21

Please produce any news stories related to any youth activities you have participated in for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 22

Please produce any calculations of economic damages you are claiming in this case and any documents related to same.

REQUEST FOR PRODUCTION NO. 23

Please produce any employment files for Hannah Crews, formerly known as Hannah Linn in your possession, custody or control

REQUEST FOR PRODUCTION NO. 24

Please produce any documents related to claims of sexual harassment or sexual misconduct made against Richard Galvan for the years 2005 to the present.



RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF RICHARD GALVAN’S RESPONSE TO DEFENDANTS’ REQUESTS FOR INTERROGATORIES**

TO: Defendants, by and through its attorney of record, C. Davis Cahpman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to the Texas Rules of Civil Procedure, Plaintiff Richard Galvan (“Richard”) files these objections and responses to Defendants’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to the Interrogatories as inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Plaintiff in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.
2. Plaintiff objects to the Interrogatories and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff legal obligations under the Texas Rules of Civil Procedure, or concern any land or property not the subject of this action. Defendants’ responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the Interrogatories and Requests for Production are given their common meanings in these responses.
3. Plaintiff’s objections and responses to the Interrogatories are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:
  - (a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;
  - (b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;
  - (c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and the right, at any time, to amend, supplement, correct, or clarify its responses to these Interrogatories if, as, and when, such action should prove necessary.

4. Plaintiff objects to the instructions and definitions to the extent they exceed the requirements of *Texas Rules of Civil Procedure*.

Pursuant to T.R.C.P. 196, Defendants submit these responses and objections to Plaintiff's Request for Production in the caused referred to above. Defendants object to each request to the extent it seeks attorney-client communications and/or work product. Pursuant to Rules 166(B) and 168 of the Texas Rules of Civil Procedure, Defendants file these objections and responses to Plaintiff's Requests for Production as follows:

Respectfully submitted,

**BENCE & ASSOCIATES, L.L.C.**

By: 

Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21 day of February, 2008, a true and correct copy of the above and foregoing document has been served upon the following counsel of record and/or parties.

  
Travis L. Bence

**INTERROGATORIES**

1. Answer: Yes.
2. Answer: August 2007, Mercedes Texas
3. Answer: Unknown as we have no employee records dating back that far.
4. Answer and Objection: I am incapable of answering such question without knowing of Defendants' definition of "attended". Further, with prior association in a funeral home, this an answer is impossible to arrive at
5. To the best of my recollection over the past 10 years: Coaching of baseball, basketball and track, Vacation Bible School, Fellowship of Christian Athletes, Two Words
6. We were members and I was involved in numerous facets of the Church not limited to any specific area of the Church. As to my involvement in the youth group, I was involved from 2005-2007.

7. Discovery is complete at this time
8. In 2007, I spoke to Starla Linn. I spoke with Oscar Brooks regarding adultery in 2007 and again in 2018 regarding sexual relations with Hannah Crews formerly known as Hannah Linn.
9. Discovery is incomplete at this time.
10. I am attending counseling
11. Discovery is incomplete at this time.
12. Discovery is incomplete at this time.
13. Blaine Crews threatened Richard and Sonia that he would put a bullet in Richard Galvan's head if he heard of Richard Galvan speak in at a public or private or religious venue and he would make sure that our children would be effected
14. None; 14 again: Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence; (b) Defendant has equal access to the such public information
15. Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence; (b) Defendant has equal access to the such public information
16. I am still reviewing such affidavits and will supplement my response within the *Texas Rules of Civil Procedure*.
17. Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence; (b) Defendant has equal access to the such public information
18. Hannah Crews formally known as Hannah Linn. Address and phone number are unknown. Such action occurred in August of 2007
19. None
20. I have no such records from 2005 to the present
21. I have no such records of any occasion from 2005 to the present.
22. Mission trips sponsored by North Way Bible Church and activities at Northway Bible Church.

VERIFICATION

STATE OF TEXAS §

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COUNTY OF CAMERON §

BEFORE ME, the undersigned Notary Public, personally appeared Richard Galvan, who stated upon oath, that the statements made in the foregoing instrument are within his personal knowledge and are true and correct.

*Richard Galvan*

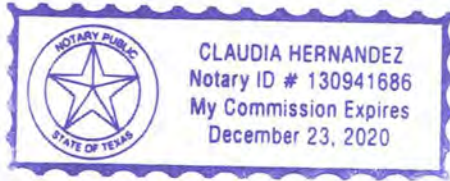
Richard Galvan

SUBSCRIBED AND SWORN TO BEFORE ME on the 20 day of February, 2020, to certify which witness my official hand and seal of office.

*Claudia Hernandez*

Notary Public in and for  
the State of Texas

My commission expires: 12/23/20



**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 6 – Richard Galvan Admissions**

RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF RICHARD GALVAN'S RESPONSES TO DEFENDANTS' REQUEST  
ADMISSIONS**

TO: Defendants, by and through its attorney of record, C. Davis Chapman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to Tex. R. Civ. P. 196, Plaintiff hereby serves its Objections and Answers to Defendant's Requests for Admissions.

**GENERAL OBJECTIONS**

1. Plaintiff objects to the request for admissions inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Plaintiff in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.

2. Plaintiff objects to the Requests for Admissions and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff's legal obligations under the Texas Rules of Civil Procedure. Plaintiff's responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the responses are given their common meanings in these responses.

3. Plaintiff's objections and responses to the requests for admissions are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:

- (a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;
- (b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;
- (c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and
- (d) the right, at any time, to amend, supplement, correct, or clarify its responses to these Interrogatories if, as, and when, such action should prove necessary.

4. Plaintiff objects to the instructions and definitions to the extent they exceed the requirements of Rule 198.

Respectfully submitted,

**BENCE & ASSOCIATES, L.L.C.**

By:   
Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

**CERTIFICATE OF SERVICE**

I, Travis L. Bence, hereby certify that a true and correct copy of the foregoing was sent to all attorneys and or parties of record, this the 21 day of February 2020

  
Travis L. Bence

## RESPONSE TO DEFENDANTS' REQUEST FOR ADMISSIONS

Response Number 1: Admit

Response Number 2: Admit

Response Number 3: Admit

Response Number 4: Admit

Response Number 5: Admit

Response Number 6: Admit that Hannah Crews babysat children; unable to admit or deny Hannah Crews was hired as definition of "hired" is unknown

Response Number 7: Unable to admit or deny as no specific records exist

Response Number 8: Deny that Richard Galvan acknowledged to Blaine Crews that Richard Galvan had sexual relations Hannah Crews

Response Number 9: Admit

Response Number 10: Unable to admit or deny as I do not understand the question

Response Number 11: Deny

Response Number 12: Deny, more importantly, I had no way of knowing where Blaine Crews was when he made the phone call.

Response Number 13: Deny



**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 7 – RICHARD GALVAN PRODUCTION RESPONSES**

RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF RICHARD GALVAN'S OBJECTIONS AND RESPONSES TO  
DEFENDANTS' REQUESTS FOR PRODUCTION**

TO: Defendants, by and through its attorney of record, C. Davis Chapman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to T.R.C.P. 196, Plaintiff submit these responses and objections to Defendants' Request for Production in the caused referred to above. Plaintiff objects to each request to the extent it seeks attorney-client communications and/or work product. Pursuant to Rules 166(B) and 168 of the Texas Rules of Civil Procedure, Defendants file these objections and responses to Defendants' Requests for Production as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to the Production Requests inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Defendant in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.

2. Plaintiff objects to the Requests for Production and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff's legal obligations under the Texas Rules of Civil Procedure, or concern any land or property not the subject of this action. Plaintiff's responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the Production Requests are given their common meanings in these responses.

3. Plaintiff's objections and responses to the Production Requests are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:

(a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;

(b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;

(c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and the right, at any time, to amend, supplement, correct, or clarify its responses to these Production Requests if, as, and when, such action should prove necessary.

4. Plaintiff objects to the instructions and definitions to the extent they exceed the requirements of Rule 197.

Respectfully submitted,


**BENCE & ASSOCIATES, L.L.C.**

By: 

Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21 day of February 2020 a true and correct copy of the above and foregoing document has been served upon the following counsel of record and/or parties.

  
Travis L. Bence

**EXHIBIT A**  
**DOCUMENTS TO BE PRODUCED**

1. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
2. Response: After a reasonable and diligent search, I have no such documents in my name. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
3. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
4. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
5. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
6. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
7. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
8. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
9. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
10. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
11. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
12. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
13. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
14. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
15. Objection: Plaintiff objects to this discovery request to the extent that the information sought:  
(a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence;  
Number 15 Again: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence
16. (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence
17. Objection: Such response is appropriate in a request for disclosure. Subject to such response, discovery is incomplete and Plaintiff will amend per the *Texas Rules of Civil Procedure*.

18. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
19. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located
20. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
21. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
22. Response: Discovery is incomplete. Plaintiff will amend per the *Texas Rules of Civil Procedure*.
23. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
24. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 8 – SONIA GALVAN INTERROGATORIES**

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS  
Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**DEFENDANTS' FIRST SET OF WRITTEN INTERROGATORIES, FIRST REQUEST  
FOR ADMISSION AND FIRST REQUEST FOR PRODCUTION TO  
PLAINTIFF SONIA GALVAN**

Please take notice that foregoing requests are hereby made pursuant to Tex. R. Civ. P. 196, 197 and 198. No later than thirty days after service of these requests, Plaintiffs shall file a written response to each request and provide documents responsive to the requests for production contained herein unless said request is objected to, in which event the all reasons for the objection shall be stated.

Respectfully Submitted,

/s/ C. Davis Chapman

C. Davis chapman

State Bar No. 00798101

P.O. Box 387

Fort Worth, Texas 76101

(817) 781-0211

(682) 334-7306 - Facsimile

ATTORNEY FOR DEFENDANTS

Email: [c.davis.chapman@gmail.com](mailto:c.davis.chapman@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on the below listed counsel of record as indicated below on this 23<sup>rd</sup> day of January, 2020.

Travis L. Bence  
Jim Young  
1018 East Tyler  
Harlingen, Texas 78550

via electronic service

/s/ C. Davis Chapman

**INTERROGATORIES**

INTERROGATORY NUMBER 1:

Did Richard Galvan have sexual relations with Defendant Hannah Crews, then Hannah Linn, on or around August, 2007?

ANSWER:

INTERROGATORY NUMBER 2:

Please state the approximate date and location of each time Richard had sexual relations with Defendant Hannah Crews.

ANSWER:

INTERROGATORY NUMBER 3:

Please state the dates of any periods in which Richard Galvan, or any business which Richard Galvan owned or was employed with, also employed Defendant Hannah Crews for the years 2005 to 2010.

ANSWER:

INTERROGATORY NUMBER 4:

Please identify each church you attended and all positions held with each such church for the years 2005 to the present.



ANSWER:

INTERROGATORY NUMBER 5:

Please identify any activities for in which you have actively associated with, supervised and/or sponsored young people for the years 2010 to the present including, but not limited to, school activities, school sponsored extracurricular activities, sports activities or teams, youth sports, church youth groups, scouting or other youth organizations,

ANSWER:

INTERROGATORY NUMBER 6:

Please identify any role you had with the Northway Bible Church in Harlingen Texas and years of such involvement with the church youth group from 2005 to the present.

ANSWER:

INTERROGATORY NUMBER 7:

Please identify each private fact you contend was disclosed by the Defendants in this suit and which is the subject of this lawsuit by providing the speaker or publisher of the statement, the date of the statement, the party to which it was made and the private fact disclosed.

ANSWER:

INTERROGATORY NUMBER 8:

Please identify the date in which you learned that Richard Galvan had engaged in sexual relations with Hannah Crews formerly known as Hannah Linn.

ANSWER:

INTERROGATORY NUMBER 10:

Please identify all communications you made with any individual after learning that Richard Galvan had engaged in sexual relations with Hannah Crews (formerly known as Hannah Linn) which related to Richard Galvans sexual conduct with Hannah Crews.

ANSWER:

INTERROGATORY NUMBER 11:

Please identify any economic damages you contend you suffered with respect the public disclosure of private facts alleged in your original and amended Petitions in this case.

ANSWER:

INTERROGATORY NUMBER 12:

Please identify any medical or psychological treatment sought by you which you contend were proximately caused by the acts of Blaine or Hannah Crews as alleged in your original or amended petition.

ANSWER:

INTERROGATORY NUMBER 13:

Please identify each act or omission of either Defendant upon which you base your claim of intentional infliction of emotional distress by providing a description of said act or omission and the date on which it occurred.

ANSWER:

INTERROGATORY NUMBER 14:

Please identify each individual, other than your attorneys and their agents, with which you have communicated regarding Richard Galvans' relationship with Hannah Crews, formerly known as Hannah Linn and state the date of each such conversation or communication.

ANSWER:

INTERROGATORY NUMBER 15:

Please identify any persons which you believe have had a romantic or sexual relationship with Richard Galvan during the years 2005 to the present and provide their name, address and phone number.

INTERROGATORY NUMBER 16:

Please identify any claims of sexual misconduct or sex based criminal offenses which have been made against Richard Galvan and state the date for same and the person making such allegation.

ANSWER:

INTERROGATORY NUMBER 17:

Please identify each company, limited liability company, limited partnership, joint venture, partnership or other business entity in which you have an ownership interest and provide the name of each such entity and the type and percentage of ownership interest which you own

ANSWER:

INTERROGATORY NUMBER 18:

Please state your net worth as of October 10, 2019 and identify any individuals or entities which assisted you in providing the amount stated.

ANSWER:

INTERROGATORY NUMBER 19:

Please state when, in 2018, you first considered changing the school for your middle son and state the reason for such change.

ANSWER:

INTERROGATORY NUMBER 20:

Please state when you first reviewed the affidavits filed by Blaine and Hannah Crews in this case and, with respect the affidavits, identify each statement you contend is inaccurate and provide a brief statement concerning the basis for your disagreement regarding each such statement.

ANSWER:

INTERROGATORY NUMBER 21:

Please identify each lawsuit to which have been a party for the years 2005 to the present by stating the cause number, style of the case, the county and court in which it was filed, whether you were a Plaintiff or Defendant and the type of case.

ANSWER:

## **REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 1

Admit that Richard Galvan has had sexual relations with Defendant Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 2

Admit that Richard Galvan worked with Defendant Hannah Crews in 2007.

REQUEST FOR ADMISSION NO. 3

Admit that you assisted with the church youth group at Northway Bible Church in Harlingen Texas.

REQUEST FOR ADMISSION NO. 4.

Admit that Plaintiffs hired Hannah Crews, formerly known as Hannah Linn, to babysit your children.

REQUEST FOR ADMISSION NO. 5

Admit that Richard Galvan paid for a hotel room at the La Quinta Inn in Mercedes, Texas in 2007 and had sex with Defendant Hannah Crews in that room.

REQUEST FOR ADMISSION NO. 6

Admit that you were aware of the fact that Richard Galvan had sex with Hannah Crews, formerly known as Hannah Linn, prior to the filing of this lawsuit.

REQUEST FOR ADMISSION NO. 7

Admit that Richard Galvan acknowledged to Blaine Crews in 2018 that he had previously engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 8

Admit that Richard Galvan has previously acknowledged to Starla Linn that he had engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 9

Admit that Richard Galvan has previously acknowledged to Sonia Galvan that he had engaged in sexual relations with Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR ADMISSION NO. 10

Admit that the statement, “Blaine Crews then explained he would have put a bullet in Richard Galvan's head if Blaine Crews knew Hannah Crews in 2007,” is true and correct and within your personal knowledge.

REQUEST FOR ADMISSION NO. 12

Admit that during your October 21, 2018 telephone conversation with Richard Galvan and Blaine Crews, you were aware that Blaine Crews lived in Fort Worth, Texas.

REQUEST FOR ADMISSION NO. 13

Admit that, prior to the filing of this lawsuit, you were aware that Richard Galvan had previously been arrested in relation to soliciting the services of a prostitute.

**REQUESTS FOR PRODUCTION**

REQUEST FOR PRODUCTION NO. 1

Please produce copies of any diaries or journals you kept in 2007 – 2019.

REQUEST FOR PRODUCTION NO. 2

Please produce copies of your phone bills for the year 2018.

REQUEST FOR PRODUCTION NO. 3

Please produce copies of any internet chat sessions, private messages or emails between you and either Defendant in this case.

REQUEST FOR PRODUCTION NO. 4

Please produce copies of any internet chat sessions, private messages or emails between you and any person concerning the acts which form the basis of your claims in this case.

REQUEST FOR PRODUCTION NO. 5

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

REQUEST FOR PRODUCTION NO. 6

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

REQUEST FOR PRODUCTION NO. 7

Please produce any medical or medical billing records document treatment which you are claiming is related to the acts which form the basis for your claims in this case.

REQUEST FOR PRODUCTION NO. 8

Please produce any photographs, illustrations, videos or drawings which are related to the acts forming the basis for your claims in this case.

REQUEST FOR PRODUCTION NO. 9

Please produce any pictures or videos of Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR PRODUCTION NO. 10

Please produce any pictures or videos of the family of Hannah Crews, formerly known as Hannah Linn.

REQUEST FOR PRODUCTION NO. 11

Please produce copies of any documents you have related to your church activities in years 2005-2008.

REQUEST FOR PRODUCTION NO. 12

Please produce copies of any correspondence between you and Blaine Crews.

REQUEST FOR PRODUCTION NO. 13

Please produce copies of any correspondence between you and any third party concerning the acts which form the basis of your claims in this case.

REQUEST FOR PRODUCTION NO. 14

Please produce copies of any correspondence between you and Hannah Crews, formerly known as Hannah Linn, in your possession, custody or control.

REQUEST FOR PRODUCTION NO. 15

For any entity identified in Interrogatory No. 18 above, please produce each such entities articles of incorporation, company agreement, bylaws, corporate minutes and organizational chart.

REQUEST FOR PRODUCTION NO. 15

Please produce copies of any written calculations of your net worth completed in 2019.

REQUEST FOR PRODUCTION NO. 16

Please produce your income tax return for the year 2019.

REQUEST FOR PRODUCTION NO. 17

Please produce any expert reports or notes which have been reviewed by a testifying expert in this case.

REQUEST FOR PRODUCTION NO. 18

Please produce any documents you reviewed in preparing your affidavits which have been filed in this case.

REQUEST FOR PRODUCTION NO. 19

Please produce any documents, awards or certificates related to positions you have held in your church for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 20

Please produce any documents, awards or certificates related to any youth organizations or activities you have participated in for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 21

Please produce any news stories related to any youth activities you have participated in for the years 2005 – 2019.

REQUEST FOR PRODUCTION NO. 22

Please produce any calculations of economic damages you are claiming in this case and any documents related to same.

REQUEST FOR PRODUCTION NO. 23

Please produce any employment files for Hannah Crews, formerly known as Hannah Linn in your possession, custody or control.

REQUEST FOR PRODUCTION NO. 24

Please produce any documents related to claims of sexual harassment or sexual misconduct made against Richard Galvan for the years 2005 to the present.



RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF SONIA GALVAN'S RESPONSE TO DEFENDANTS' REQUESTS FOR INTERROGATORIES**

TO: Defendants, by and through its attorney of record, C. Davis Cahpman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to the Texas Rules of Civil Procedure, Plaintiff Sonia Galvan ("Sonia") files these objections and responses to Defendants' First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to the Interrogatories as inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Plaintiff in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.
2. Plaintiff objects to the Interrogatories and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff legal obligations under the Texas Rules of Civil Procedure, or concern any land or property not the subject of this action. Plaintiff's responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the Interrogatories are given their common meanings in these responses.
3. Plaintiff's objections and responses to the Interrogatories are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:
  - (a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;
  - (b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;
  - (c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and the right, at any time, to amend, supplement, correct, or clarify its responses to these Interrogatories if, as, and when, such action should prove necessary.
4. Plaintiff objects to the instructions and definitions to the extent they exceed the

requirements of Rule 197.

**GENERAL OBJECTIONS**

1. Defendants object to the Production Requests inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Defendant in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.
2. Defendants object to the Requests for Production and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Defendants' legal obligations under the Texas Rules of Civil Procedure, or concern any land or property not the subject of this action. Defendants' responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the Production Requests are given their common meanings in these responses.
3. Plaintiff object to the instructions and definitions to the extent they exceed the requirements of Texas Rules of Civil Procedure.

Respectfully submitted,

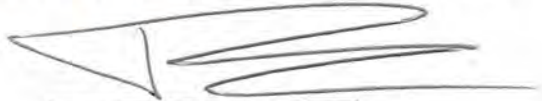
**BENCE & ASSOCIATES, L.L.C.**

By: 

Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 01 day of February 2000 a true and correct copy of the above and foregoing document has been served upon the following counsel of record and/or parties.

  
Travis L. Bence

## INTERROGATORIES

1. Answer: Yes, I learned in 2018.
2. Answer: I only know of August 2007
3. Answer: Unknown as we have no employee records dating back that far.
4. Answer and Objection: I am incapable of answering such question without knowing of Defendants' definition of "attended". Further, with prior employment in a funeral home, this an answer is impossible to arrive at
5. To the best of my recollection over the past 10 years: Vacation Bible School, Fellowship of Christian Athletes, Two Words
6. We were members and I was involved in numerous facets of the Church not limited to any specific area of the Church. As to my involvement in the youth group, I was involved from 2005-2007.
7. Discovery is complete at this time
8. In 2007, Richard told me he committed adultery. In October of 2018, I learned Richard had a sexual encounter with Hannah Crews formerly known as Hannah Linn.
9. Omitted
10. Debbie Sanchez, Bonnie De La Rosa, Monica Caban
11. Discovery is incomplete at this time.
12. I am attending counseling
13. Blaine Crews threatened Richard and Sonia that he would put a bullet in Richard Galvan's head if he heard of Richard Galvan speak in at a public or private or religious venue and he would make sure that our children would be effected
14. See Number 10
15. None
16. None
17. Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence; (b) Defendant has equal access to the such public information
18. Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence;
19. October 2018, after Blaine Crews threatened my children
20. I am still reviewing such affidavits and will supplement my response within the *Texas Rules of Civil Procedure*.
21. Objection: Plaintiff objects to this discovery request to the extent that the information sought: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence; (b) Defendant has equal access to the such public information

VERIFICATION

STATE OF TEXAS       §  
  §  
COUNTY OF CAMERON §

BEFORE ME, the undersigned Notary Public, personally appeared Sonia Galvan, who stated upon oath, that the statements made in the foregoing instrument are within her personal knowledge and are true and correct.

  
\_\_\_\_\_

Sonia Galvan

SUBSCRIBED AND SWORN TO BEFORE ME on the 20 day of February, 2020, to certify which witness my official hand and seal of office.

  
\_\_\_\_\_

Notary Public in and for  
the State of Texas

My commission expires: 12/23/20



**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 9 – SONIA GALVAN ADMISSIONS**

RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF SONIA GALVAN'S RESPONSES TO DEFENDANTS' REQUEST  
ADMISSIONS**

TO: Defendants, by and through its attorney of record, C. Davis Chapman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to Tex. R. Civ. P. 196, Plaintiff hereby serves its Objections and Answers to Defendant's Requests for Admissions.

**GENERAL OBJECTIONS**

1. Plaintiff objects to the request for admissions inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Plaintiff in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.

2. Plaintiff objects to the Requests for Admissions and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff's legal obligations under the Texas Rules of Civil Procedure. Plaintiff's responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the responses are given their common meanings in these responses.


3. Plaintiff's objections and responses to the requests for admissions are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:

- (a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;
- (b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;
- (c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and
- (d) the right, at any time, to amend, supplement, correct, or clarify its responses to these Interrogatories if, as, and when, such action should prove necessary.

4. Plaintiff objects to the instructions and definitions to the extent they exceed the requirements of Rule 198.

Respectfully submitted,

**BENCE & ASSOCIATES, L.L.C.**

By:   
Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

**CERTIFICATE OF SERVICE**

I, Travis L. Bence, hereby certify that a true and correct copy of the foregoing was sent to all attorneys and or parties of record, this the 21 day of February, 2020.

  
Travis L. Bence

**RESPONSE TO DEFENDANTS' REQUEST FOR ADMISSIONS**

Response Number 1: Admit

Response Number 2: Admit

Response Number 3: Admit

Response Number 4: Admit that Hannah Crews babysat children; unable to admit or deny Hannah Crews was hired as definition of "hired" is unknown

Response Number 5: Unable to admit or deny as I have no such records

Response Number 6: Admit, I learned in 2018

Response Number 7: Deny that Richard Galvan acknowledged to Blaine Crews that Richard Galvan had sexual relations Hannah Crews

Response Number 8: Admit

Response Number 9: Unable to admit or deny as I do not understand the question

Response Number 10: Deny

Response Number 11: Omit

Response Number 12: Deny, more importantly, I had no way of knowing where Blaine Crews was when he made the phone call.

Response Number 13: Admit



**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 10 – SONIA GALVAN PRODUCTION RESPONSES**

RICHARD GALVAN and  
SONIA GALVAN  
Plaintiffs,

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IN THE DISTRICT COURT

vs.

445<sup>th</sup> JUDICIAL DISTRICT

BLAINE CREWS and HANNAH CREWS  
Defendants.

CAMERON COUNTY, TEXAS

**PLAINTIFF SONIA GALVAN’S OBJECTIONS AND RESPONSES TO DEFENDANTS’  
REQUESTS FOR PRODUCTION**

TO: Defendants, by and through its attorney of record, C. Davis Chapman, P.O. Box 387, Fort Worth, Texas 76101

Pursuant to T.R.C.P. 196, Plaintiff submit these responses and objections to Defendants’ Request for Production in the caused referred to above. Plaintiff objects to each request to the extent it seeks attorney-client communications and/or work product. Pursuant to Rules 166(B) and 168 of the Texas Rules of Civil Procedure, Defendants file these objections and responses to Defendants’ Requests for Production as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to the Production Requests inclusive to the extent that they ask for privileged information, including, without limitation, information which was developed for or in anticipation of litigation, or which constitutes a confidential attorney-client communication or attorney work-product, or which is subject to the party communication or common-defense privileges. In the event any privileged or work product information is disclosed by Defendant in this response, or in any documents which may be designated herein, such disclosure is inadvertent and does not constitute a waiver of any privilege or work-product protection.

2. Plaintiff objects to the Requests for Production and to each of the accompanying "Definitions" to the extent that they attempt to add to, supplement, or modify Plaintiff’s legal obligations under the Texas Rules of Civil Procedure, or concern any land or property not the subject of this action. Plaintiff’s responses comply with the requirements of the Texas Rules of Civil Procedure, and all words used in the Production Requests are given their common meanings in these responses.

3. Plaintiff’s objections and responses to the Production Requests are made without in any way waiving or intending to waive but, to the contrary, reserving and intending to reserve:

(a) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of any of the responses, or the subject matter thereof, for any purpose, in any subsequent proceeding in, or at the trial of, this or any other action;

(b) the right to object on any ground at any time, to the use of any of the responses, or the subject matter thereof, in any subsequent proceeding in, or at trial of this action;

(c) the right to object on any ground, at any time, to a demand for further responses to these or other discovery involving or relating to the subject matter of this discovery; and the right, at any time, to amend, supplement, correct, or clarify its responses to these Production Requests if, as, and when, such action should prove necessary.

4. Plaintiff objects to the instructions and definitions to the extent they exceed the requirements of Rule 197.

Respectfully submitted,

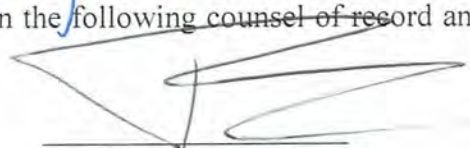
~~BENCE & ASSOCIATES, L.L.C.~~

By: 

Travis L. Bence  
State Bar No. 24029441  
1018 East Tyler  
Harlingen, Texas 78550  
Telephone: 956.440.8900  
Facsimile: 956.440.8902  
TravisBence@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of February 2000 a true and correct copy of the above and foregoing document has been served upon the following counsel of record and/or parties.

  
Travis L. Bence

**EXHIBIT A**  
**DOCUMENTS TO BE PRODUCED**

1. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
2. Response: After a reasonable and diligent search, I have no such documents in my name. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
3. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
4. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
5. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
6. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
7. Response: Plaintiff will to make such documents available for review and reproduction at Defendant's expense as they are regularly kept at a mutually agreeable time.
8. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
9. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
10. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
11. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
12. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
13. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
14. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
15. Objection: Plaintiff objects to this discovery request to the extent that the information sought:  
(a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence;  
Number 15 Again: (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence
16. (a) seeks information that is not relevant or is not reasonably calculated to lead to the discovery of admissible evidence
17. Objection: Such response is appropriate in a request for disclosure. Subject to such response, discovery is incomplete and Plaintiff will amend per the *Texas Rules of Civil Procedure*.
18. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.

19. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located
20. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
21. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
22. Response: Discovery is incomplete. Plaintiff will amend per the *Texas Rules of Civil Procedure*.
23. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.
24. Response: After a reasonable and diligent search, no such items have been located. Plaintiff will amend per the *Texas Rules of Civil Procedure* should such documents be located.

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 11 – RICHARD GALVAN SUPPLEMENTAL RESPONSES**

CAUSE NO. 2018 – DCL – 0638

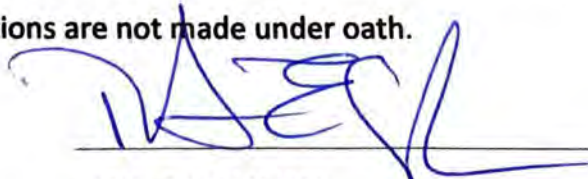
<b>RICHARD GALVAN AND SONIA GALVAN</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
<b>v.</b>	<b>§</b>	<b>445<sup>TH</sup> JUDICIAL DISTRICT</b>
<b>BLAINE CREWS AND HANNAH CREWS</b>	<b>§</b>	<b>CAMERON COUNTY, TEXAS</b>

**PLAINTIFF’S FIRST SUPPLEMENTAL ANSWERS TO DEFENDANT’S FIRST SET OF WRITTEN INTERROGATORIES, FIRST SUPPLEMENTAL RESPONSES TO DEFENDANT’S FIRST REQUEST FOR PRODUCTION AND FIRST SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSIONS**

Richard Galvan provides these, his First Supplemental Answers to Defendant’s First Set of Interrogatories, First Supplemental Responses to First Request for Production, and First Supplementa Response to Request for Admissions by and through his attorney of record, Angela P. Nix, 955 E. Madison Brownsville, Texas 78520

Richard Galvan, Plaintiff, provides the attached Supplemental Answers to Interrogatories and states under oath that all answers are true, subject to the following qualifications:

1. Answers to Interrogatory number(s) -0- are based on information obtained from another person.
2. Answers to interrogatories inquiring about persons with knowledge of relevant facts, trial witnesses, and legal contentions are not made under oath.



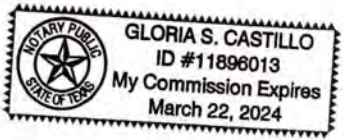
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RICHARD GALVAN

SIGNED under oath before me on May 13, 2020

Gloria S. Castillo

Notary Public, State of Texas



Respectfully submitted,

Law Office of Angela P. Nix  
955 East Madison Street  
Brownsville, Texas 78520  
gloriastcastillo@yahoo.com  
Tel: (956) 548-0521; Fax: (956) 548-0522

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix  
State Bar No. 15037600  
**Attorney for Plaintiffs Richard Galvan  
and Sonia Galvan**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13 day of May, 2020, I provided the foregoing First Supplemental Answers to Defendant's First Set of Written Interrogatories, First Supplemental Responses to First Request for Production, and First Supplemental Response to Request for Admissions to the following attorney of record for Plaintiffs Blaine Crews and Hannah Crews, C. Davis Chapman, via e-mail to c.davis.chapman@gmail.com and/or e-file service of process:

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix



Supplemental Responses : Interrogatories

Interrogatory Number 3:

Please state the dates of any periods in which Richard Galvan, or any business which Richard Galvan owned or was employed with, also employed Defendant Hannah Crews for the years 2005 to 2010.

Response: None.

Interrogatory Number 4:

Please identify each church you attended and all positions held with each such church for the years 2005 to the present.

Response: From 2005 to present I held no position of authority at any church  
I was a member of the following churches:

Northway Bible Church-Harlingen, Texas 2005-2009 and 2010-2012  
Valley International Christian Church, San Benito, Texas 2009-2010  
Church of The Living Word 6 mos in 2010

I attended a few services at the following churches:  
Lifeline Family Church Harlingen, Texas  
Livingway Church in Brownsville, Texas

Interrogatory Number. 6:

Please identify any role you had with the Northway Bible Church in Harlingen, Texas and years of such involvement with the church youth group.

Response: Between 2005 and 2007, I and my wife assisted with fund raising and some church trips and mentoring volunteers for vacation bible school. By mentoring we provided advice on college and we would buy pizza.

Interrogatory Number 7:

Please identify each allegedly private fact which is the subject of this lawsuit by providing the speaker or publisher of the statement, the date of the statement, the party to which it was made and the contents of allegedly defamatory statement or a summary of your understanding of the statement

Response: Plaintiffs do not so contend nor allege at this time.

Interrogatory Number 9:

Please identify any economic damages you contend you suffered with respect (*sic*) the public disclosure of private facts alleged in your original and amended Petitions in this case.

Response: Plaintiffs do not so contend nor allege at this time.

Interrogatory Number 10:

Please identify any medical or psychological treatment sought by you which you contend were proximately caused by the acts of Blaine or Hannah Crews as alleged in your original or amended petition.

Response: Plaintiffs do not so contend nor allege at this time.

Interrogatory Number 11:

Please identify each conversation in which you contend that either Defendant committed an assault by threat and identify the date if such conversation, the parties to the conversation, the substance of the conversation including the threat made and the location of the parties at the time of such conversation.

Response: Plaintiff no longer contends that either Defendant committed an assault by threat.

Interrogatory Number 12:

Please identify each allegedly private fact which is the subject of this lawsuit by providing the speaker or publisher of the statement, the date of the statement, the party to which it was made and the contents of allegedly defamatory statement or a summary of your understanding of the statement

Response: Plaintiffs do not so contend nor allege at this time.

Interrogatory Number 14:

Please identify each company, limited liability company, limited partnership, joint venture, partnership or other business entity in which you have an ownership interest and provide the name of such entity and the type and percentage of ownership interest which you won.

Response: I own 3 companies they are all LLC's  
MD International LLC 50%  
G5 Internet Services LLC 50%  
G5 Streaming, a Texas Limited Liability Company 100%

Interrogatory Number 15:

Please state your net worth as of October 10, 2019 and identify any individuals or entities which assisted you in providing the amount stated.

Response: \$ 120,000.00, no one assisted

Interrogatory Number 16:

Please state when you first reviewed the affidavits filed by Blaine and Hannah Crews in this case, and with respect to the affidavits, identify each statement you contend is inaccurate and provide a brief statement concerning the basis for your disagreement regarding each such statement.

Response: Do not recall exact date I imagine it was shortly after they were filed in or around Mid-February.

As to the Affidavit of Hannah Crews dated 2/11/19:

In Paragraph 3, the statement "I sat under their leadership and mentorship as a regular youth group member and attendee" is untrue;

In Paragraph 4, I never offered Hannah Crews a job at Orbit Broadband and she never worked at Orbit Broadband. She would stop in after school and occasionally answer the phones in the front desk.

Paragraphs 5,6,7 and 8 are untrue in their entirety;

Paragraph 9; There were no weeks of conversation, or manipulation nor coercion in my office.

In or about August 2007 and the La Quinta Hotel event there was no car parked outside and no speculation on my part regarding a private investigator. There were no "sexual acts" plural.

There was one act of sexual intercourse. She was most emphatically not a virgin. I do not recall anything about her going back to school or a volleyball game that day.

Paragraph 10; I never texted her following the La Quinta Hotel. She texted me several times, which I did not respond to, including a final text from her mother's phone that her mother had found her phone and to not respond.

I did talk to Starla at her house and acknowledged that I had sex one time with Hannah. Hannah never spoke with Sonia. Sonia never made the statement to Hannah that I sent mixed signals to young girls.. To the best of my belief we did not leave the Church in December 2007. It is my recollection that there was a subsequent missionary trip to Nicaragua that Hannah went on in 2008 prior to her graduation fro High School. We did not leave the Church until after that tri in 2008.

Paragraph 11: I never intimidated, nor threatened, nor manipulated Hannah Crews, including leading up to her first year in college.

Paragraphs 12 and 13 are untrue in their entirety;

Paragraph 14: I dispute that Hannah kept trying to protect her mind from the trauma of the memories because there was no trauma, Her sexual history was such that there was no education nor trauma surrounding the incident.

Paragraph 16: I never "confessed to all of it" to Blaine. I acknowledged one act of sexual intercourse.

Paragraph 17: I have never been inappropriate with any girls/teenagers, other than Hannah Crews. I have never used my authority to coerce or abuse anyone.

As to the Affidavit of Blaine Crews dated 2/11/19:

The statements contained in Paragraphs 4 and 5 are untrue, but I understand that is what he was informed;

Paragraph 6; I did not respond that I knew why he was calling. I did not respond anything regarding losing a child, nor did I agree with Hannah's version of events;

Paragraph 7 is untrue in its entirety with regard to his concern for daughters or young women. Specifically, he never mentioned the desire to protect others and he never said he was going to call my children's school because he believed that I was associating with young women there or at the Church. What he did say was "This is not the end. Your children will be affected".

Paragraph 8: I categorically deny that I have ever used a position of authority to coerce or manipulate Hannah Crews into having sex. On the contrary, she pursued me, and she seduced me. It was multiple occasions of her coming onto me and I succumbed, for which I will forever be remorseful.

Interrogatory Number 17:

Please identify each lawsuit to which (*sic*) have been a party for the years 2005 to the present by stating the cause number, style of the case, the county and court in which it was filed, whether you were a plaintiff or defendant and the type of case.

Response: 2015; employee workman comp  
Cause No 2015-DCL-05962-E; Rubyeela Lopez, Indiv./Est of Pedro Samuel Salazar vs. Orbit Broadband LLC, et al.; 357<sup>th</sup> Dist Court  
Cameron County

Interrogatory Number 20:

Please identify any payments of money you made to Hannah Crews, formerly known as Hannah Linn during the years from 2005 to the present.

Response: None.

Interrogatory Number 21:

Identify any occasion in which you provided counseling or pastoral support to Hannah Crews, formerly known as Hannah Linn during the years from 2005 to the present and state the date and subject of each such session.

Response: None. I never provided counseling to Hannah Crews.

Supplemental Responses- Requests for Admission

Request for Admission 7;

Admit that Richard Galvan paid for a hotel room at the La Quinta Inn in Mercedes, Texas in 2007 and had sex with Defendant Hannah Crews, formerly known as Hannah Linn, in that room.

Response: Admit.

Request for Admission 10:

Admit that Richard Galvan has previously acknowledged to Sonia Galvan that he had engaged in sexual relations with Hannah Crews, formerly known as Hannah Lin.

Response: I admit I acknowledged to Sonia Galvan that I had sex one time with Hannah Crews.

Request for Admission 11:

Admit that the statement "Blaine Crews then explained he would have put a bullet in Richard Galvan's head if Blaine Crews knew Hannah Crews in 2007", is true and correct and within your personal knowledge."

Response: I admit that Blaine Crews made the quoted statement to me and in the hearing of Sonia Galvan.

Supplemental Responses- Request for production of Documents

Request for Production No. 15

Produce copies of any written calculations of your net worth completed in 2019.

Response: Plaintiffs have no documents responsive to this request.

Request for Production No. 16

Please produce your income tax return for the year 2019.

Response: Plaintiff has not filed a 2019 Income Tax Return.

Request for Production No. 18

Please produce any documents you reviewed in preparing your affidavits which have been filed in this case.

Response: None

Request for Production No. 22

Please produce any calculations of economic damages you are claiming in this case and any documents related to same.

Response: \$ 6,600.57 (of which \$ 5,000.00 is attorney fees, \$ 1100.00 is airfare, \$ 390.60 is hotel fare, and \$ 99.97 is car rental) see attached receipts (also submitted as Exhibits via efilng prior to last hearing)

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 12 – RICHARD GALVAN SECOND SUPPLEMENTAL  
RESPONSES**

CAUSE NO. 2018 – DCL – 0638

RICHARD GALVAN AND SONIA GALVAN § IN THE DISTRICT COURT  
v. § 445<sup>TH</sup> JUDICIAL DISTRICT  
BLAINE CREWS AND HANNAH CREWS § CAMERON COUNTY, TEXAS

PLAINTIFF'S SECOND SUPPLEMENTAL ANSWERS TO DEFENDANT'S FIRST SET OF  
WRITTEN INTERROGATORIES

Richard Galvan provides these, his Second Supplemental Answers to Defendant's First Set of Interrogatories by and through his attorney of record, Angela P. Nix, 955 E. Madison Brownsville, Texas 78520

Richard Galvan, Plaintiff, provides the attached Supplemental Answers to Interrogatories and states under oath that all answers are true, subject to the following qualifications:

1. Answers to Interrogatory number(s) -0- are based on information obtained from another person.
2. Answers to interrogatories inquiring about persons with knowledge of relevant facts, trial witnesses, and legal contentions are not made under oath.

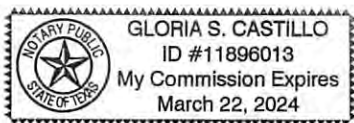
  
\_\_\_\_\_  
RICHARD GALVAN

SIGNED under oath before me on May 29, 2020.

Gloria S. Castille



Notary Public, State of Texas



Respectfully submitted,

Law Office of Angela P. Nix  
955 East Madison Street  
Brownsville, Texas 78520  
gloriascastillo@yahoo.com  
Tel: (956) 548-0521; Fax: (956) 548-0522

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix  
State Bar No. 15037600  
**Attorney for Plaintiffs Richard Galvan  
and Sonia Galvan**

### CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of May, 2020, I provided the foregoing Second Supplemental Answers to Defendant's First Set of Written Interrogatories and Second Supplemental Response to Request for Admissions to the following attorney of record for Plaintiffs Blaine Crews and Hannah Crews, C. Davis Chapman, via e-mail to c.davis.chapman@gmail.com.

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix

Supplemental Responses : Interrogatories

Interrogatory Number 14:

Please identify each company, limited liability company, limited partnership, joint venture, partnership or other business entity in which you have an ownership interest and provide the name of such entity and the type and percentage of ownership interest which you won.

Response: I own 4 companies they are all LLC's  
MD International LLC 50%  
G5 Internet Services LLC 50%  
G5 Streaming, a Texas Limited Liability Company 100%  
59.03 Nexus LLC 50%

Interrogatory Number 17:

Please identify each lawsuit to which (*sic*) have been a party for the years 2005 to the present by stating the cause number, style of the case, the county and court in which it was filed, whether you were a plaintiff or defendant and the type of case.

Response: 2015; employee workman comp  
Cause No 2015-DCL-05962-E; Rubyeela Lopez, Individ./Est of Pedro Samuel Salazar vs. Orbit Broadband LLC, et al.; 357<sup>th</sup> Dist Court  
Cameron County  
  
2009; civil  
Cause No. 2009-02-001577; Galvan /Orbit BB vs. Peace; 444 Dist Ct  
Cameron County

**CAUSE NO. 2018—DCL-06387-I**

**RICHARD GALVAN and  
SONIA GALVAN**

**Plaintiffs,**

**vs.**

**BLAINE CREWS and HANNAH CREWS**

**Defendants**

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**IN THE DISTRICT COURT**

**CAMERON COUNTY, TEXAS**

**445<sup>th</sup> JUDICIAL DISTRICT**

**EXHIBIT 13 – SONIA GALVAN SUPPLEMENTAL RESPONSES**

CAUSE NO. 2018 – DCL – 0638

SONIA GALVAN AND SONIA GALVAN           §       IN THE DISTRICT COURT  
v.   §       445<sup>TH</sup> JUDICIAL DISTRICT  
BLAINE CREWS AND HANNAH CREWS       §       CAMERON COUNTY, TEXAS

**PLAINTIFF'S FIRST SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSIONS**

Sonia Galvan provides these, her First Supplemental Response to Request for Admissions by and through her attorney of record, Angela P. Nix, 955 E. Madison Brownsville, Texas 78520.

Respectfully submitted,

Law Office of Angela P. Nix  
955 East Madison Street  
Brownsville, Texas 78520  
gloriascastillo@yahoo.com  
Tel: (956) 548-0521; Fax: (956) 548-0522

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix  
State Bar No. 15037600  
**Attorney for Plaintiffs Sonia Galvan and  
Sonia Galvan**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of June , 2020, I provided the First Supplemental Response to Request for Admissions to the following attorney of record for Plaintiffs Blaine Crews and Hannah Crews, C. Davis Chapman, via e-mail to c.davis.chapman@gmail.com.

By: /s/ Angela P. Nix

\_\_\_\_\_  
Angela P. Nix

**Supplemental Responses- Requests for Admission**

**Request for Admission 2;**

**Admit that Richard Galvan worked with Defendant Hannah Crews in 2007.**

**Response: Deny**

**Request for Admission 5:**

**Admit that Richard Galvan paid for a hotel room at La Quinta Inn in Mercedes, Texas in 2007, and had sex with Defendant Hannah Crews in that room.**

**Response: Admit**