

CAUSE NO. 2025-25681

DR. SONIA MELO, M.D.,
Plaintiff,

v.

**UNIVERSITY OF TEXAS MD
ANDERSON CANCER CENTER,**
Defendant.

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**IN THE DISTRICT OF

HARRIS COUNTY, TEXAS

61ST JUDICIAL DISTRICT**

DEFENDANT'S ORIGINAL ANSWER

Defendant, The University of Texas MD Anderson Cancer Center ("UT MDACC") files this original answer to Plaintiff's Amended Petition for Declaratory Judgment, Violation of Procedural Due Process, and Breach of Contract, ("Amended Petition") and shows as follows:

I. GENERAL DENIAL

In accordance with Texas Rule of Civil Procedure 92, UT MDACC denies all the allegations and claims in Plaintiff's Amended Petition.

II. AFFIRMATIVE & OTHER DEFENSES

By asserting any of the following defenses, UT MDACC is not assuming any burden—whether of proof, production, or persuasion—related to the defense that is not otherwise imposed by law. UT MDACC reserves the right to assert additional defenses as they become apparent:

1. UT MDACC asserts both immunity from suit and immunity from liability under the doctrine of sovereign immunity.
2. UT MDACC asserts that Plaintiff failed to exhaust her administrative remedies.

3. UT MDACC asserts that Plaintiff's claims are barred by the applicable statute of limitations.

4. UT MDACC asserts all applicable immunities and statutory limitations and caps on damages that may apply to Plaintiff's claim for damages.

5. UT MDACC asserts that Plaintiff has failed to state a claim upon which relief can be granted.

6. UT MDACC asserts that Plaintiff has failed to mitigate her damages, if any.

7. UT MDACC asserts that Plaintiff's own acts and omissions caused or contributed to her alleged injuries.

8. UT MDACC asserts that Plaintiff's claims are barred by Plaintiff's failure to give proper notice of her claims.

9. UT MDACC asserts that Plaintiff's claims are barred by the doctrine of laches.

III. PRAYER

UT MDACC prays that Plaintiff take nothing by her suit, and that the Court dismiss Plaintiffs' claims and tax and adjudge all costs to and against Plaintiff. In addition, UT MDACC requests that the Court grant it all other and further relief to which it may be justly entitled.

Respectfully submitted,

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/s/ C. Lee Winkelman

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**Counsel for Defendant, The University of Texas
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CERTIFICATE OF SERVICE

I certify that on August 21, 2025, a true and correct copy of this document was served via the court's e-service system on the following counsel of record:

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Laura Hendrix on behalf of Lee Winkelman

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