

NO. 2022-12411A

EVO MERCHANT SERVICES, LLC	§	IN THE DISTRICT COURT
Plaintiff/Garnishor,	§	
	§	
VS.	§	157 <sup>th</sup> JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
Garnishee.	§	HARRIS COUNTY, TEXAS

**CHASE BANK'S ORIGINAL ANSWER TO WRIT  
OF GARNISHMENT AND REQUEST FOR AWARD OF COSTS**

JPMorgan Chase Bank, N.A., Garnishee in the above-captioned cause, files this Original Answer to the Writ of Garnishment issued on June 1, 2022, and Request for an Award of its Rule 677 costs, and would respectfully show the Court as follows.

1. The Writ was served on Garnishee on June 3, 2022, by delivery to Garnishee's registered agent in Dallas, Texas.
2. At the time the Writ was served on it, Garnishee was indebted to Dang Pham ("Defendant") in the sum of EIGHTY-NINE, AND 55/100 DOLLARS (\$89.55).
3. At the time the Writ was served on it, Garnishee was not in possession of any other effects belonging to Defendant.
4. As of the date of this Original Answer to Writ of Garnishment, Garnishee is indebted to Defendant in the sum of EIGHT HUNDRED, TWENTY-SIX AND 43/100 DOLLARS (\$826.43).
5. As of the date of this Original Answer to Writ of Garnishment, Garnishee is not in possession of any other effects belonging to Defendant.
6. Garnishee does not have any knowledge of any other person who is indebted to or has possession of any other effects belonging to Defendant.

7. As a result of the service of the Writ of Garnishment, it has been necessary for Garnishee to employ the undersigned attorneys to answer the Writ herein and to otherwise represent it. Under TEX. R. CIV. P. 677, Garnishee is entitled to recover its costs and a reasonable attorney's fee, and submits that a sum of at least \$750.00 would be a reasonable attorney's fee.

WHEREFORE, JPMorgan Chase Bank holds the sum above, pending the disposition of this cause, and respectfully requests that, on final hearing of this cause, the following relief:

1. That all claims to such sum be determined and adjudicated, and that Garnishee be discharged from all liability to Plaintiff and Defendant respecting same.

2. That Garnishee recover against Plaintiff or Defendant, as provided in TEX. R. CIV. P. 677, its costs and expenses, including a reasonable attorney's fee in a total amount of at least Seven Hundred, Fifty and No/100 Dollars (\$750.00).

3. For such other and further relief, general or special, at law or equity, to which Garnishee may show itself justly entitled.

Respectfully submitted,

**Truman E  
Spring**

Digitally signed by Truman E Spring  
DN: cn=Truman E Spring, o=Spring Law  
Firm, ou,  
email=tspring@springlawfirm.com,  
c=US  
Date: 2022.06.22 16:28:27 -05'00'

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ATTORNEY FOR JPMORGAN CHASE BANK, N.A.

### CERTIFICATE OF SERVICE

I certify that on June 24, 2022, I served a true and correct copy of the foregoing pleading on the following counsel of record by the Texas E-File electronic file manager unless the counsel's email address is not on file with Texas E-File, then by email:

Brian W. Clark  
KANE RUSSELL COLEMAN LOGAN, PC  
901 Main Street, Suite 5200  
Dallas, Texas 75202  
[bclark@krcl.com](mailto:bclark@krcl.com)

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Truman E. Spring

VERIFICATION

STATE OF TEXAS

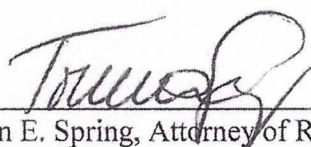
§

§

COUNTY OF ROCKWALL

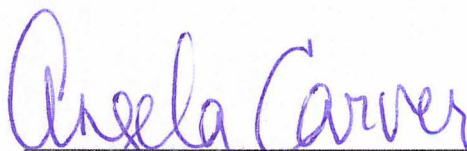
§

My name is Truman E. Spring. I am attorney of record for JPMorgan Chase Bank, N.A., herein named Garnishee. I have read the foregoing Original Answer to Writ of Garnishment as counsel for the Bank. Based upon my personal research of the Bank's records concerning this matter, I can attest that all factual statements contained in this Answer are based upon my personal knowledge from such records, and such statements are true and correct.



Truman E. Spring, Attorney of Record  
JPMorgan Chase Bank, N.A.

SUBSCRIBED AND SWORN TO before me, the undersigned Notary Public, on this the 24 day of June, 2022, to certify which witness my hand and official seal.



Notary Public in and for the State of Texas

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Truman Spring  
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Envelope ID: 65756743  
Status as of 6/24/2022 1:40 PM CST

#### Case Contacts

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