

CAUSE NO. 2021-75474 A

**TVT 2.0, LLC, a Utah Limited
Liability Company,**

Plaintiff,

v.

**SCOTTLINE LLC d/b/a
SCOTTLINE, and JYOTHI
KAKUMANU,**

Defendants,

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

APPLICATION FOR WRIT OF GARNISHMENT

TO THE HONORABLE JUDGE OF THIS COURT:

NOW COMES TVT 2.0, LLC, a Utah Limited Liability Company, its successors in interests and assigns, (“Plaintiff”), and files this Application for the Issuance of a Writ of Garnishment After Judgment and in support thereof will show the Court the following:

I.

Application for Garnishment is via the Plaintiff, TVT 2.0, LLC, a Utah Limited Liability Company. Judgment Defendants are Scottline LLC d/b/a Scottline, and Jyothi Kakumanu, whose last known addresses are:

Scottline LLC d/b/a Scottline: 6575 W. Loop S, Suite 215, Bellaire, TX 77401

Jyothi Kakumanu: 3622 Ohain Dr., Irving, Texas 75063

Garnishee is: Hancock Whitney Bank.

II.

Plaintiff is the owner of a valid and subsisting domesticated judgment rendered in this action on March 2, 2022. A copy of the domesticated judgment is attached hereto as Exhibit "A."

Plaintiff originally obtained an original judgment in the matter styled "TVT 2.0 LLC, a Utah Limited Liability Company v. Scottline LLC d/b/a Scottline, and Jyothi Kakumanu" in Case No. 210902350 in the Third Judicial District Court, Salt Lake County, State of Utah. Plaintiff's judgment against Defendants was for the sum of \$310,501.40.

As of the date of filing of this application, the Judgment remains unsatisfied.

Within Applicant's knowledge, Defendants do not possess any non-exempt property in Texas subject to execution to satisfy the Judgment. This garnishment is not sought to injure Judgment Debtors or Garnishee.

III.

Plaintiff is entitled to the issuance of a Writ of Garnishment on the grounds stated in the attached affidavit. The affidavit is incorporated in this application by reference.

IV.

Plaintiff has reason to believe, and does believe, that the said Garnishee is indebted to the Defendants by reason of one or more bank accounts in the name of Scottline LLC d/b/a Scottline and Jyothi Kakumanu.

V.

WHEREFORE, Plaintiff prays that:

- a) Writ of Garnishment be issued directed to the Garnishee;
- b) Plaintiff be granted Judgment against Garnishee for the amount now due on Plaintiff's Judgment already rendered against Defendant, together with costs of suit in the original case and in this garnishment proceeding;
- c) Plaintiff be granted all further relief to which the Plaintiff may be entitled.

Respectfully Submitted,

THE PADGETT LAW GROUP

/s/ Jennifer K. Chacko

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ATTORNEYS FOR PLAINTIFF

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

DECLARATION IN SUPPORT OF PETITION TO ENFORCE FOREIGN JUDGMENT

“My name is Jennifer K. Chacko I am of sound mind and capable of making this unsworn declaration in accordance with Texas Civil Practice and Remedies Code § 132.001. I am over the age of twenty-one (21) years and have never been convicted of a felony or crime involving dishonesty. I am fully competent to testify to the matters herein.

I am an attorney with Padgett Law Group ("PLG"), which represents the Plaintiff in the above captioned matter.

Plaintiff filed an action captioned as "TVT 2.0, LLC, a Utah Limited Liability Company vs SCOTTLINE LLC d/b/a SCOTTLINE, and JYOTHI KAKUMANU" in Case No. 210902350 in the Third Judicial District Court, Salt Lake County, State of Utah. Plaintiff's judgment against Defendants was for the sum of \$310,501.40.

Plaintiff subsequently obtained a domesticated judgment in this action on March 2, 2022. A copy of

the domesticated judgment is attached hereto as Exhibit "A."

Within Affiant's knowledge, based on information and belief, SCOTTLINE LLC d/b/a SCOTTLINE, and JYOTHI KAKUMANU, Judgment Defendants, do not possess property within the state of Texas subject to execution sufficient to satisfy the Judgment. The following investigative means were utilized by my office to ascertain this fact: TLO by Transunion software.

I reviewed the results of this comprehensive search prior to filing of the Application for Writ of Garnishment with the Court. This garnishment is not sought to injure the Defendant or the Garnishee. Affiant has reason to believe, and does believe, that said Garnishee is indebted to the Defendant by reason of one or more bank accounts in the name of SCOTTLINE LLC d/b/a SCOTTLINE, and JYOTHI KAKUMANU.

My name is Jennifer K. Chacko, my date of birth is October 3, 1981, and my work address is 5501 LBJ Freeway, Suite 925, Dallas, TX 75240, United States. I declare under the penalty of perjury that the foregoing is true and correct."

Executed in Dallas County, Texas, on May 19, 2022.

/s/ Jennifer K. Chacko

Jennifer K. Chacko

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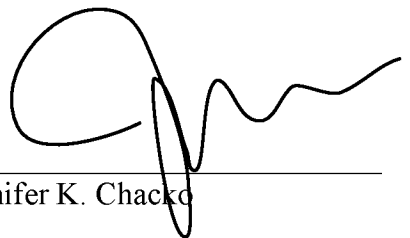
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