

Xxx5276	\$1,585.78	(Cory Hughes)
Xxx7987	\$0.00	(Hughes Boy Trucking)
Xxx8929	-\$10.00	(Hughes Boy Trucking)
Xxx9847	-\$402.79	(Cory Hughes)

3. At the time the Writ was served on it, Garnishee was not in possession of any other effects belonging to Defendant(s).

4. As of the date of this Original Answer to Writ of Garnishment, Garnishee is indebted to Judgment-debtor(s) in the sums as set forth above.

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(s).

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(s).

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. If the debtor or other party disputes this Answer, reasonable additional fees are requested in the amount of \$250.00 per hour. In the event of an appeal to the court of appeals, Garnishee would be further entitled to \$2,500.00 as a reasonable attorney's fee. In the event of the filing of a petition for review to the Texas Supreme Court, Garnishee would be entitled to an additional \$1,500.00. Should the petition be granted, Garnishee would be entitled to an additional \$2,500.00 as a reasonable attorney's fee.

8. To the extent the foregoing is insufficient; the Garnishee Bank generally denies each and every allegation set forth on the pleadings as allowed under the Tex. R. Civ. P.

WHEREFORE, Wells Fargo Bank, N.A. holds the sum(s) above, pending the disposition of this cause, and respectfully requests that, on final hearing of this cause, the following relief:

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

10. That Garnishee recover against Plaintiff or Defendant(s), 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).

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

Respectfully submitted,

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

By: /s/ Brent W. Martinelli
BRENT W. MARTINELLI
State Bar No. 24037037
brent.martinelli@qpwblaw.com

1700 Pacific Avenue, Suite 4545
Dallas Texas 75201
Telephone: 214-754-8755
Facsimile: 214-754-8744

Counsel for Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I certify that on August 22, 2022, I served a true and correct copy of the foregoing pleading by e-filing or electronic mail on the following counsel of record:

Anh H. Regent
Regent & Associates, LLP
500 Lovett Blvd., Suite 225
Houston, TX 770056
aregent@regentlawfirm.com


/s/ Brent W. Martinelli
BRENT W. MARTINELLI

STATE OF TEXAS

COUNTY OF DALLAS

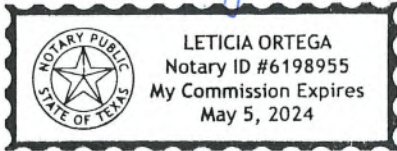
VERIFICATION

My name is Brent W. Martinelli. I am attorney of record for Wells Fargo 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.



Brent W. Martinelli

SUBSCRIBED AND SWORN TO before me, the undersigned Notary Public, on this the 22nd day of August, 2022, to certify which witness my hand and official seal.



Notary Public

My Commission Expires: May 5, 2024

Automated Certificate of eService

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brent Martinelli		brent.martinelli@qpwbllaw.com	8/22/2022 3:23:49 PM	SENT
Anh Huynh Regent	24004882	aregent@regentlawfirm.com	8/22/2022 3:23:49 PM	SENT