

CAUSE NO. 2022-04484-A

SPECIALTY METAL PRODUCTS, INC.	§	IN THE DISTRICT COURT OF
d/b/a SMP SUPPLY	§	
	§	
Plaintiff/Garnishor,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
ZIONS BANCORPORATION d/b/a	§	
AMEGY BANK NA,	§	
	§	
Garnishee,	§	
	§	
INNOVATIVE HEAT TREATMENT	§	
SOLUTIONS, INC.	§	
	§	
Defendant.	§	157th JUDICIAL DISTRICT

PLAINTIFF’S MOTION TO DISSOLVE GARNISHMENT AND DISMISS GARNISHEE

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, Plaintiff, Specialty Metal Products, Inc. d/b/a SMP Supply, (“Plaintiff” or “SMP”), and files this Motion to Dissolve the Post-Judgment Writ of Garnishment and Dismiss Zions Bancorporation d/b/a Amegy Bank NA (“Garnishee”) without prejudice. In support thereof, Plaintiff respectfully shows the Court the following:

Plaintiff recovered a judgment against Innovative Heat Treatment Solutions, Inc. (“Debtor”), on the 18th day of May, 2022 for the sum of \$83,731.62 in the 157th Judicial District of Harris County, Texas, in a cause numbered 2022-04484 and styled *Specialty Metal Products, Inc. d/b/a SMP Supply v. Innovative Heat Treatment Solutions, Inc.* (the “Underlying Lawsuit”).

Ancillary to the Underlying Lawsuit, Plaintiff, as Garnishor, instituted this garnishment action by filing an Application for Post-Judgment Writ of Garnishment (the “Application”). The Court granted the Application on June 30, 2022, and a Writ of Garnishment (the “Writ”) was issued

and served on Garnishee thereafter.

Plaintiff, Garnishee, and Debtor have reached an agreement regarding the disbursement of the funds impounded by the Writ. As such, Plaintiff hereby requests that the Court enter an Order dissolving the Writ and dismissing Garnishee without prejudice.

WHEREFORE, Plaintiff requests that this Court grant this Motion to Dissolve the Post-Judgment Writ of Garnishment against Zions Bankcorporation d/b/a Amegy Bank NA and dismiss the claims against Zions Bankcorporation d/b/a Amegy Bank NA without prejudice.

Respectfully Submitted,

CRADY JEWETT McCULLY & HOUREN LLP

By: /s/ W. Matthew Carver

W. Matthew Carver

State Bar No. 00783804

Email: mcarver@cjmhlaw.com

J. Daniel Long

State Bar No. 24036985

Email: dlong@cjmhlaw.com

Christopher J. Matulis

State Bar No. 24128524

Email: cmatulis@cjmhlaw.com

Kendall V. Speer

State Bar No. 24077954

Email: kspeer@cjmhlaw.com

2727 Allen Parkway, Suite 1700

Houston, Texas 77019-2125

Telephone: (713) 739-7007

Facsimile: (713) 739-8403

***Attorneys for Plaintiff, Specialty Metal Products,
Inc. d/b/a SMP Supply***

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.

Reanna Palmer on behalf of Matthew Carver

Bar No. 00783804

rpalmer@cjmhlaw.com

Envelope ID: 67679638

Status as of 8/26/2022 9:48 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
W. MatthewCarver		mcarver@cjmhlaw.com	8/25/2022 5:20:23 PM	SENT
John Herrmann		jherrmann@cjmhlaw.com	8/25/2022 5:20:23 PM	SENT
J. DanielLong		dlong@cjmhlaw.com	8/25/2022 5:20:23 PM	SENT
Jeffrey D.Stewart		jstewart@wellcuellar.com	8/25/2022 5:20:23 PM	ERROR

