

CAUSE NO. 2022-63554

ALTHEA SHACKELFORD
PLAINTIFF,

VS.

SPECIALIZED LOAN SERVICING, LLC
AND
U.S. BANK, N.A.
DEFENDANTS.

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IN THE DISTRICT COURT

OF HARRIS COUNTY, TEXAS

334TH JUDICIAL DISTRICT

**PLAINTIFF'S MOTION TO EXTEND
TEMPORARY RESTRAINING ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW ALTHEA SHACKELFORD, Plaintiff in the above entitled and numbered cause and moves this court to extend the Temporary Restraining Order issued herein on September 30, 2022 and as grounds therefore would show the following;

1.) Counsel for Plaintiff would show that since the granting of the Temporary Restraining Order on September 30, 2022, out of county service of the pleading has not been executed on the Defendants, Specialized Loan Servicing, LLC, and U.S. Bank, N.A.

2.) More specifically, Counsel for Plaintiff would show that the citations were ready for service on or about Tuesday, October 4, 2022, and that in lieu of service needing to be effectuated out of county through third party, he has not receive proof and return of service.

3.) Further, counsel for Plaintiff was notified by the court on Friday, October 7, 2022, that the Court had a conflict and need to reschedule the temporary injunction hearing from October 11, 2022, to a later date.

4.) In light of these circumstances, counsel for Plaintiff is seeking an extension of the present Temporary Restraining Order for an additional fourteen (14) days from October 14, 2022, to October 28, 2022.

WHEREFORE, Premises Considered, Plaintiff requests that upon notice of the filing of this motion that the Court enter an order extending the Temporary Restraining Order for such other relief as it may be entitled for an additional fourteen (14) days.

Respectfully Submitted,

SHACKELFORD & ASSOCIATES, LLC

/s/Ray L. Shackelford
RAY L. SHACKELFORD
State Bar No. 18071500
1406 Southmore Blvd.
Houston, Texas 77004
713 520-8484 Office
713 520-8192 Fax
rshackctic@yahoo.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify pursuant to TEX. R. CIV. P. 21a., that a true and correct copy of the foregoing instrument was served upon counsel for all parties via (hand delivery, facsimile, and/or certified mail return receipt requested) on this 10th day of October, 2022.

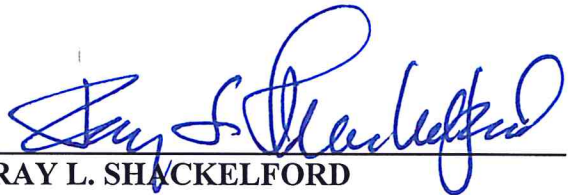
/s/Ray L. Shackelford

VERIFICATION

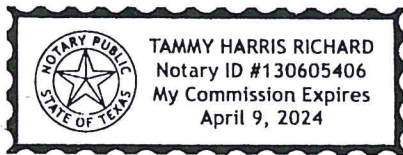
STATE OF TEXAS §

COUNTY OF HARRIS §

On this day RAY L. SHACKELFORD, appeared before me, the undersigned notary public and after I administered an oath to him, upon his oath, he has read the Plaintiff's Motion To Extend Temporary Restraining Order that the facts in it are within his personal knowledge; and they are true and correct.


RAY L. SHACKELFORD

SWORN TO and SUBSCRIBED before me Ray L. Shackelford, on this the 10th day of October, 2022.




NOTARY PUBLIC, STATE OF TEXAS

Automated Certificate of eService

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Ray Shackelford on behalf of Ray Shackelford

Bar No. 18071500

rshackctic@yahoo.com

Envelope ID: 69065317

Status as of 10/10/2022 2:49 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Ray LShackelford		rshackctic@yahoo.com	10/10/2022 2:41:53 PM	SENT