

NO. 2020-05134-A

ALEJANDRA DIAZ	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
vs.	§	295 th 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 September 15, 2022, including its request for Rule 677 costs, and would respectfully show the Court as follows:

(1) The Writ was served upon Garnishee on September 20, 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 Charles J. Israel d/b/a Charles J. Israel, All Star Tax Services ("Defendant") *in excess of* the sum of the underlying judgment of THIRTY-ONE THOUSAND, SIX HUNDRED FORTY-EIGHT AND 74/100 DOLLARS (\$31,648.74).

(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 excess of* the sum of the underlying judgment of THIRTY-ONE THOUSAND, SIX HUNDRED FORTY-EIGHT AND 74/100 DOLLARS (\$31,648.74).

(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.

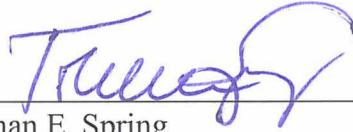
(6) Garnishee does not have any knowledge of any other person who is indebted to or has possession of any other effects belonging to Defendant.

(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 \$900.00 would be a reasonable attorney's fee.

WHEREFORE, Chase Bank holds a sum *in excess of* the sum of the underlying judgment of THIRTY-ONE THOUSAND, SIX HUNDRED FORTY-EIGHT AND 74/100 DOLLARS (\$31,648.74), plus post-judgment interest and the costs of this proceeding, 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 Nine Hundred and No/100 Dollars (\$900.00).
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
State Bar No. 18966550
SPRING LAW FIRM
1101 Ridge Road, Suite 205
Rockwall, Texas 75087
(214) 752-3113
(214) 752-3434 Facsimile
tspring@springlawfirm.com

ATTORNEY FOR JPMORGAN CHASE BANK, N.A.

CERTIFICATE OF SERVICE

I certify that on October 14, 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:

Melinda Lopez
LONE STAR LEGAL AID
P.O. Box 398
Houston, Texas 77001
mlopez@lonestarlegal.org

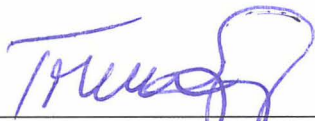


Truman E. Spring

VERIFICATION

STATE OF TEXAS §
 §
COUNTY OF ROCKWALL §

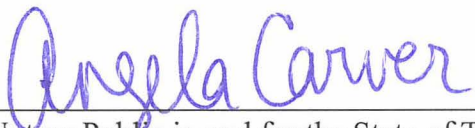
My name is Truman E. Spring. I am attorney of record for JPMorgan Chase Bank, N.A., herein named Garnishee. I have read the foregoing Original Answer to Writ of Garnishment as counsel for the Bank. Based upon my personal research of the Bank’s records concerning this matter, I can attest that all factual 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.

14 SUBSCRIBED AND SWORN TO before me, the undersigned Notary Public, on this the day of October, 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

Bar No. 18966550

tspring@springlawfirm.com

Envelope ID: 69225229

Status as of 10/14/2022 10:58 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Melinda Lopez		mlopez@lonestarlegal.org	10/14/2022 10:48:19 AM	SENT