

EXHIBIT

A

CAUSE NO. 2018-14976 – A

RENEE DUGUE,

Plaintiff,

v.

J. P. MORGAN CHASE BANK,
NATIONAL ASSOCIATION

Garnishee.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

234TH JUDICIAL DISTRICT

APPLICATION FOR WRIT OF GARNISHMENT

Writ of Garnishment Based on Valid, Subsisting Judgment

Plaintiff makes this application for the issuance of a writ of garnishment against garnishee, and as grounds for the writ shows:

Plaintiff is an individual and resident of Harris County, Texas.

J. P. Morgan Chase Bank, National Association, hereafter referred to as “Garnishee,” is a financial institution with a branch location of 712 Main Street, Houston, Texas 77002. It has its principal place of business at 270 Park Avenue, New York, NY 10017. Service of the writ of garnishment may be had on the garnishee by serving its registered agent, CT Corporation System, 350 N. St. Paul Street, Ste. 2900, Dallas, TX 75201.

On July 20, 2022, the 234th Judicial District Court in a case styled *Renee Dugue v. Reginald C. Adams and Reginald C. Adams, LLC*, Cause No. 2018-14976, entered a Final Judgment in favor of Renee Dugue. *See* Exhibit A. The Final Judgment was against both Reginald C. Adams and Reginald C. Adams, LLC (“Judgment Debtors”). The Judgment Debtors have a business address of 2220F Commerce Street, Houston, Texas 77002.

The final judgment was: (a) \$27,200.00 in actual damages; (b) \$5,943.01 in prejudgment interest; (c) post-judgment interest on the sum of \$27,200.00; (d) post-judgment interest on the sum of pre-judgment interest of \$5,943.01; (e) post-judgment interest on the court costs of \$7,113.31; and (f) court costs of \$7,113.31. This judgment is in all things final, valid, and subsisting, and it is wholly unsatisfied to the extent of \$40,479.88 as of September 13, 2022.

Plaintiff is not seeking to injure or harass the garnishee or the debtors by suing out a writ of garnishment. Additionally, plaintiff will show that there is a danger that the assets will be dissipated should a writ not be granted.

Within plaintiff's knowledge, Reginald C. Adams and Reginald C. Adams, LLC do not possess property in Texas subject to execution that is sufficient to satisfy the above-described judgment.

Plaintiff has reason to believe, and does believe, that garnishee has in hand effects belonging to both Reginald C. Adams and Reginald C. Adams, LLC.

This application is supported by the affidavit of Renee Dugue, who is a person having knowledge of the relevant facts. *See* Exhibit B.

WHEREFORE, plaintiff requests the writ of garnishment be issued, and that plaintiff has a judgment against garnishee to satisfy the prior judgment as provided by law, together with all costs of court, and other relief to which plaintiff may be justly entitled. Plaintiff further requests that the Court fix the amount of plaintiff's bond and debtor's replevy bond, all in accordance with Rule 658 of the Texas Rules of Civil Procedure.

Respectfully submitted,

RUSTY HARDIN & ASSOCIATES, LLP

/s/ Ryan Higgins

Ryan Higgins

State Bar No. 24007362

rhiggins@rustyhardin.com

5 Houston Center
1401 McKinney, Suite 2250
Houston, TX 77010
(713) 652-9000 Telephone
(713) 652-9800 Facsimile

ATTORNEY FOR RENEE DUGUE

EXHIBIT A

CAUSE NO. 2018-14976

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RENEE DUGUE,

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IN THE DISTRICT COURT

Plaintiff,

v.

HARRIS COUNTY, TEXAS

**REGINALD C. ADAMS and
REGINALD C. ADAMS LLC,**

Defendants.

234TH JUDICIAL DISTRICT

FINAL JUDGMENT

After a trial on merits on June 29, 2022 and having considered and granted Defendants' Motion for Partial Direct Verdict on the issue of Attorney's Fees, responses and arguments related thereto, the court hereby RENDERS judgment for Plaintiff, Renee Dugue.

It is therefore, ORDERED, ADJUDGED and DECREED that Reginald C. Adams LLC and Reginald C. Adams, jointly and severely, pay Renee Dugue the following:

- a. Actual damages in the amount of \$27,200.00;
- b. Pre-judgment interest on the sum of \$27,200.00 from March 6th, 2018 through the day before the date of this judgment is signed at the annual rate of five (5%) percent per annum. This judgment is signed July 18, 2022 and the prejudgment interest is \$5,943.01;
- c. Post-judgment interest on the sum of \$27,200.00 from the date of this judgment is signed at the annual rate of five (5%) percent per annum compounded annually until the judgment is paid;
- d. Post-judgment interest on the sum of the pre-judgment interest of \$5,943.01 from the date of this judgment is signed at the annual rate of five (5%) percent per annum compounded annually until the judgment is paid;
- e. Post-judgment interest on the court costs from the date of this judgment is signed at the annual rate of five (5%) percent per annum compounded annually until the judgment is paid; and
- f. Court costs.

The court orders execution to issue for this judgment and all writs of execution and other processes as may be necessary in the collection of this judgment shall issue without further order of this Court.

This judgment is final, disposes of all claims and all parties, and is appealable.

SIGNED on this the _____ day of July 2022.

Signed:
7/20/2022



JUDGE PRESIDING

APPROVED AS TO FORM:

BOHREER LAW FIRM PLLC

By /s/ Pritesh Soni (signed with permission)

E. Michelle Bohreer

State Bar No. 06717100

Pritesh Soni

State Bar No. 24063926

109 N Post Oak Lane, Suite 425

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ATTORNEY FOR DEFENDANTS

REGINALD C. ADAMS and REGINALD C. ADAMS LLC

RUSTY HARDIN & ASSOCIATES, LLP

By /s/ Ryan K. Higgins

Ryan K. Higgins

State Bar No. 24007362

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ATTORNEY FOR PLAINTIFF

RENEE DUGUE

Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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.

Sandra Dominguez on behalf of Ryan Higgins
Bar No. 24007362
sdominguez@rustyhardin.com
Envelope ID: 66312434
Status as of 7/14/2022 10:55 AM CST

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I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this September 13, 2022

Certified Document Number: 103065766 Total Pages: 4

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

EXHIBIT B

4. Within my knowledge, Reginald C. Adams and Reginald C. Adams, LLC do not possess property in *Texas* subject to execution that is sufficient to satisfy the above-described judgment.

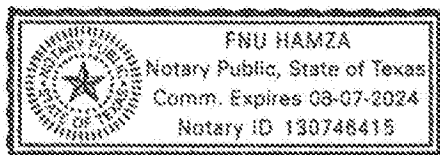
5. I have *reason* to believe, and do believe, that Garnishee, J. P. Morgan Chase Bank, National Association, has in hand effects belonging to Reginald C. Adams and Reginald C. Adams, LLC

6. *Reginald C. Adams* and Reginald C. Adams, LLC banks at Garnishee.

7. I am not seeking to injure or harass the Garnishee or the debtors by suing out a writ of garnishment. There is a danger that the funds of Reginald C. Adams and Reginald C. Adams, LLC will be dissipated should a writ not be granted.


RENEE DUGUE

SUBSCRIBED AND SWORN TO on this 15th day of September, 2022.



FNU HAMZA
Notary Public in and for
The State of Texas
My commission expires: 08/07/2024

CAUSE NO. 2018-14976 – A

RENEE DUGUE,

Plaintiff,

v.

J. P. MORGAN CHASE BANK,
NATIONAL ASSOCIATION

Garnishee.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

234TH JUDICIAL DISTRICT

ORDER

On the ____ day of _____, 2022, the application and affidavit of Renee Dugue, plaintiff in this cause, for issuance of a writ of garnishment was presented ex parte.

After considering the pleadings and other papers on file with the Court, the evidence presented and the argument of counsel, the Court finds and concludes that plaintiff is entitled to a writ of garnishment as requested, for the following reasons:

1. Plaintiff has a valid, subsisting judgment and makes an affidavit stating that, within the plaintiff's knowledge, the defendants do not possess property in Texas subject to execution sufficient to satisfy the judgment.

The Court further finds and concludes that issuance of the writ without prior notice to the debtors **Reginald C. Adams and Reginald C. Adams, LLC** is justified in the circumstances for the reason that the assets will be dissipated such that Defendants will not be able to satisfy the judgment rendered in *Renee Dugue v. Reginald C. Adams and Reginald C. Adams, LLC*, Cause No. 2018-14976.

IT IS, THEREFORE, ORDERED that the clerk issue a writ of garnishment that commands J. P. Morgan Chase Bank, National Association, as garnishee, to appear as required

by law and answer on oath what, if anything, the garnishee is indebted to: **Reginald C. Adams and Reginald C. Adams, LLC** and was when the writ was served, and what effects, if any, of **Reginald C. Adams and Reginald C. Adams LLC**, the garnishee possesses and did possess when this writ was served, (any and all accounts including but not limited to account number ending in 2217) and what other persons, if any, within the garnishee's knowledge, are indebted to or have effects of **Reginald C. Adams and Reginald C. Adams, LLC**.

IT IS FURTHER ORDERED that the maximum value of property or indebtedness that may be garnished is \$40,479.88. Further, the writ shall command J. P. Morgan Chase Bank, National Association, NOT to pay to **Reginald C. Adams and Reginald C. Adams, LLC** any debt or to deliver any effects, pending further order of this Court, without retaining property of **Reginald C. Adams and Reginald C. Adams, LLC** in an amount sufficient to satisfy and equal the maximum value of property or indebtedness that may be garnished as above ordered.

IT IS FURTHER ORDERED that this order shall not be effective unless and until plaintiff executes and files with the clerk a bond, or cash in lieu of bond, in conformity with the law, in the amount of One-Hundred Dollars (\$100.00).

IT IS FURTHER ORDERED that **Reginald C. Adams and Reginald C. Adams, LLC**, in order to replevy property pursuant to writ, shall file with the officer who levied the writ a bond, in conformity with the law, in the amount of \$40,479.88 unless **Reginald C. Adams and Reginald C. Adams, LLC** files a bond in an amount otherwise provided by the law and the Texas Rules of Civil Procedure.

SIGNED this _____ day of _____, 2022.

JUDGE PRESIDING



Garnishment in Wrong Category. You're Busted.

Bandit Texas lawyer Ryan Higgins tried to fly under LIT's radar. We'll always catch crooked Texas Law Violators, like y'all.



By [justicefortexas](#)

Posted on September 15, 2022



SHARE



TWEET



SHARE



EMAIL



LIT COMMENTARY

THE HYPOCRISY OF RYAN HIGGINS;

“Free speech is one of the most important facets of American democracy, and companies don’t get to use the law to muzzle their critics. We’re proud to have

**helped our client
successfully defend her
business and her good
name.”**

 **The Unlawful Garnishment After
Judgment Case Still blocked by Perverted
Judge Sandill – as at ~~Oct 31~~ Nov. 11, Nov.
30, 2022**



**ROGUE HOUSTON LAWYER RYAN HIGGINS
OF RUSTY HARDIN CASE SEALED COZ HE
COULDN'T TAKE LIT'S CRITIQUE (19 SEP)**



The records you have queried are currently **CONFIDENTIAL** or this case has been **SEALED**. No further information regarding the below case will be disseminated until such time as the records are no longer confidential.

Case (Cause) Number	File Date	Court	
202259087-7	9/15/2022	127	

[New Search](#)

**JUDICIAL RAGE CONFIRMS LIT'S
ALLEGATIONS ARE TRUE - THE JUDICIARY
IS TAINTED BY OUTLAWS IN DIRTY BLACK
ROBES**



**JUDGE LOSES
TEMPER WITH
LIT AND WE
LOVE IT**

Unethically sealed
a new garnishment
case after LIT
published negative
article about Rusty
Hardin & Ass.



**HARRIS COUNTY
JUDGE RAVI SANDILL**



202259087


**DUGUE, RENEE VS. J. P. MORGAN
CHASE BANK, NATIONAL ASSOCIATION**



(COURT 127, JUDGE RAVI K. SANDILL)

SEP 15, 2022 | REPUBLISHED BY LIT: SEP 15, 2022

**INTENTIONALLY FILED UNDER OTHER CIVIL,
NOT GARNISHMENT AFT JUDGMENT**

202259087 - DUGUE, RENEE vs. J. P. MORGAN CHASE BANK, NATIONAL ASSOCIATION (Court 127)

Print All  (non-financial)
Chronological History

Summary	Appeals	Cost Statements	Transfers	Post Trial Writs	Abstracts	Parties	Court Costs	Judgments/Events	Settings	Services/Notices	Court Registry	Child Support	Images
Preview DocketSheet Add docket sheet to basket 													
Print Summary 													
Case (Cause) Summary							The Current Presiding Judge						
File Date	9/15/2022						Current Court	127 th					
Case (Cause) Location							Filing Court	127 th					
Case (Cause) Status	Active - Civil						Address	201 CAROLINE (Floor: 10) HOUSTON, TX 77002 Phone:7133686161					
Case (Cause) Type	OTHER CIVIL						JudgeName	RAVI K. SANDILL					
Next/Last Setting Date	N/A						Court Type	Civil					
Jury Fee Paid Date	9/15/2022												



“Engaging in debt collection without filing a bond with the secretary of state is a violation of Chapter 392 and may also be a criminal offense. Tex. Fin. Code §

392.402.”



1/14



— LIT COMMENTARY

You are NOT smarter than a 5th Grader, bandit debt collectin' lawyer RYAN KEES HIGGINS, **licensed with the State Bar of Texas** since 1998.

No, Ryan Higgins, you are an embarrassment to yourself.

Rusty Hardin & Ass., LLP don't have a valid, current surety bond filed with the Texas Secretary of State, in violation of Texas law.

+ **WHO IS HOUSTON BANDIT LAWYER RYAN HIGGINS? (BIO FROM RKH-LAW)**

+ **REPRESENTATIVE CASES AT RUSTY HARDIN ASSOCIATES, HOUSTON, TEXAS**

+ **REPRESENTATIVE CASES AT BOIES, SCHILLER FLEXNER LLP, NEW YORK, NEW YORK**

+ **REGINALD C ADAMS (DEBTOR)**

+ **HARDIN & ASSOCIATES ATTORNEY SECURES \$\$\$ TEXAS SUPREME COURT VICTORY \$\$\$ IN CORPUS CHRISTI SPA OWNER'S DEFAMATION DEFENSE**

