

or notice to any parties herein; and all of said parties shall take notice of and plead and answer to all claims and pleadings now on file and which may hereafter be filed in the cause by all other parties hereto who may intervene herein and set up their respective tax claim against said property.

5. The attorney whose name is signed hereto is legally authorized and empowered to institute and prosecute this action on behalf of Plaintiff; and Plaintiff should recover reasonable attorney's fees for the preparation, filing and handling of this suit, for which Plaintiff is entitled to recover, as provided by law. Plaintiff has incurred expenses in the sum of \$150.00 for each tract listed above in procuring data and information as to the name, identity and location of the necessary parties and in procuring legal descriptions of the above listed property. Such expenses are reasonable and necessary to the prosecution of this suit.

THEREFORE, Plaintiff prays upon the final hearing hereof it have personal judgment against each of the respective Defendant owners (unless identified as "in rem only") of each lot, block, tract or item(s) of personal property described herein for the respective years as shown by Exhibit "A" and such other and further penalty and interest that may have accrued and be due and payable at the time judgment is rendered herein; that Plaintiff recover from all Defendants, all court costs, and expenses of foreclosure, penalty for collection costs as provided by Texas Tax Code §33.07 or reasonable attorneys' fees for those years not subject to collection penalties, and reasonable expenses in procuring data and information as to the identity and location of the necessary parties and the necessary legal description of the property; that the judgment include a decree establishing Plaintiff's lien or liens as superior to all other liens and judgments existing against the property herein described, and foreclosing said Plaintiff's lien or liens on each lot, block, tract or item(s) of personal property described in Exhibit "A", for the full amount of taxes, interest, penalty, collection penalty and/or attorney's fees, and court cost due on each respective lot, block, tract, or item(s) of personal property; that the Plaintiffs and Intervenors that are taxing units have judgment in such amount as may be established by their petitions and pleadings; that the Court incorporate in its judgment a finding of the reasonable fair value, in bulk or in parcel, of the property described in Exhibit "A"; for an order of sale as provided by law; that the net proceeds of such sale be distributed to all taxing units who are party hereto and who may intervene herein pro rata and in proportion to the amount of their respective tax liens as may be established herein as provided by law, for writ of possession in behalf of the purchaser or purchasers thereunder as provided by law and for such other and further relief, general and special, to what Plaintiff may be entitled.

Respectfully submitted,

ATTORNEY FOR CITY OF BAYTOWN



Randall B. Strong
Bar No. 19416500
407 W. Baker Rd., Suite Z
Baytown, Texas 77521
(281) 428-2200
(281) 427-0864 (Facsimile)
randy.strong@randallbstrong.com