#### Cause No. 202277073

VILLAGE PLACE COMMUNITY ASSOCIATION, INC.,	§ §	IN THE DISTRICT COURT OF
Plaintiff,	§	
v.,	& & &	HARRIS COUNTY, TEXAS
ROBERT STRANGE and LANA STRANGE, Defendants.	§ §	133 <sup>rd</sup> JUDICIAL DISTRICT

## **MOTION TO RETAIN**

# TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Village Place Community Association, Inc. Plaintiff, and files this Motion to Retain, and in support hereof would respectfully show the Court as follows:

I.

This case is currently set for hearing on the Court's DWOP docket for September 22, 2023. No continuances have previously granted herein. Plaintiff has recently obtained service on the Defendants in compliance with the Court's Order of August 22, 2023 authorizing substitute service.

II.

Good cause exists for granting the Motion to Retain in that Plaintiff has amended its petition on September 6, 2023. Defendant's need an opportunity to review the claims in the new petition. Plaintiff awaits the certified return receipts to verify that defendants received the amended petition.

Plaintiff requests that this case be retained on the Court's docket so that it can pursue its claims to judgment. Plaintiff intends to file a motion for default judgment as soon as the green cards are returned and the matter is ripe for default.

This request to retain this matter on the Court's docket is not for delay only, but that justice may be done.

WHEREFORE, premises considered, Plaintiff asks the Court to retain this case for a time period of no less than least ninety (90) days.

Respectfully submitted,

GREGG & GREGG, P.C. 16055 Space Center Boulevard Suite 150

Houston, Texas 77062 Telephone: (281) 480-1211 Facsimile: (281) 480-1210

BY:

Jake R Leggett SBN: 24117219

ATTORNEY FOR PLAINTIFF

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ROBERT STRANGE and LANA STRANGE, Defendants.	§ §		133 <sup>rd</sup> JUDICIAL DISTRICT

## VERIFICATION

BEFORE ME, the undersigned Notary Public, on this day personally appeared Jake R. Leggett, known to me to be the person whose name is subscribed to this instrument and who being by me duly sworn on his oath deposed and said that he is the attorney for the Village Place Community Association, Inc.., plaintiff in the above-entitled cause; that he has read the above and foregoing Motion to Retain, and that every statement contained therein is within his personal knowledge and is true and correct.

SUBSCRIBED AND SWORN to before me on this the 18th day of

, 2023, to certify which witness my hand and official seal.

SHARI ROGERS Notary ID #2308149 My Commission Expires