NO.

တ တ တ တ တ တ တ တ တ တ

AMERICAN EXPRESS NATIONAL BANK Garnishor

VS.

JPMORGAN CHASE BANK, N.A. Garnishee

MAJID SAFSHEKAN

Defendant(s)

IN THE COUNTY CIVIL COURT

AT LAW NO. 2

HARRIS COUNTY, TEXAS

A2201169

APPLICATION FOR WRIT OF GARNISHMENT AFTER JUDGMENT

- 1. <u>Parties.</u> Plaintiff in Garnishment is AMERICAN EXPRESS NATIONAL BANK, which may be served through its undersigned counsel of record. Garnishee is JPMORGAN CHASE BANK, N.A., which may be served by delivering the writ to its registered agent, C T CORPORATION SYSTEM, at its registered office 1999 BRYAN ST., SUITE 900 DALLAS, TX 75201-3136.
- 2. Affidavit for Garnishment. In Cause No. 1119801 on the docket of this Court, styled "AMERICAN EXPRESS NATIONAL BANK v. MAJID SAFSHEKAN," the Plaintiff obtained a judgment against such Defendant, MAJID SAFSHEKAN (Social Security Number ***-**-1849), (hereinafter referred to as "Defendant") on May 10, 2019 in the principal amount of \$32,727.05, and for all costs of this suit. Said judgment is valid and subsisting and remains unsatisfied. Defendant does not possess, within affiant's knowledge, property in Texas subject to execution sufficient to satisfy said judgment. The garnishment applied for is not sued out to injure either the Defendant or Garnishee. The Affiant has reason to believe, and does believe, that the said Garnishee is indebted to the Defendant by reason of one or more bank accounts, or has effects belonging to the Defendant. The Affiant further says he/she is authorized to make this affidavit and Application and that he/she has read this affidavit and that the statements contained in this affidavit are within his/her personal knowledge and are true and correct.

Shawn R. Redman

SWORN TO AND SUBSCRIBED BEFORE ME by the said Shawn R. Redman, attorney of record for the Plaintiff in the above-styled and numbered cause, on this 200 day of

20 to certify which witness my hand and seal of office.

Tiffany Cheree Douglas My Commission Expires 2/23/2026 Notary ID 126637852

3. Request for Writ. Plaintiff asks that a Writ of Garnishment issue and be served upon the said Garnish

Respectfully Submitted,

-Shawn R. Redman (SBN: 24033112)**

Teri S. Mace (SBN: 12759480)*

Marlei E. Thames (SBN: 24125221)* Jeffrey Hacker (SBN: 08667300)*

Derek A. Devine (SBN: 24131174)**

Couch Lambert, LLC

*Dallas Office:

4144 North Central Expressway, Ste. 1260

Dallas, Texas 75204

**Houston Office:

6200 Savoy, Ste. 800

Houston, Texas 77036

***Mailing Address:

3501 N. Causeway, Ste. 800

Metairie, LA 70002

(866) 282-3853

servicetx@gulfsouthlegal.com

ATTORNEYS FOR PLAINTIFF

EXHIBIT "A"



AMERICAN EXPRESS NATIONAL	§	IN	THE	COUNTY	COURT
BANK,	§				
Plaintiff,	§ 8				
vs.	§	AT	LAW 1	NUMBER T	WO (2) OF
MAJID SAFSHEKAN,	§ &				
Defendant.	§	HAF	RRIS	COUNTY,	TEXAS

DEFAULT JUDGMENT

Plaintiff appeared through its attorney of record and presented its Motion for Default Judgment. Defendant, although duly cited to appear and answer herein, has failed to file an Answer within the time appropriated by law and has wholly defaulted.

The Court has considered the pleadings and records for the American Express account ending in 74008 previously ending in 73000 at issue in this cause and the evidence and is of the opinion that Judgment should be rendered for Plaintiff.

It is accordingly ADJUDGED that AMERICAN EXPRESS NATIONAL BANK, Plaintiff, recover from MAJID SAFSHEKAN, Defendant, Judgment for:

- 1. \$32,727.05 Principal balance; and
- 2. Costs of Court.

IT IS ORDERED that Plaintiff shall have any and all Writs and other processes available to enforce this Judgment.

This Judgment finally disposes of all parties and all claims and is appealable.

SIGNED this 10 day of 10 d

MSDUP OF THE SURVEY OF THE SUR

APPROVED AS TO FORM:

- Kuri Casas

BY:

Donald D. DeGrasse SBN: 05641800 Reneé Casas SBN: 24107728 Eric M. Spence SBN: 24070658

1800 Bering Dr., Ste 1000 Houston, Texas 77057 Tel: (713) 840-9111 Fax: (713) 840-7263

E-mail: attorneys@degrasselaw.com ATTORNEYS FOR PLAINTIFF