10/31/2023 7:17 PM Marilyn Burgess - District Clerk Harris County Envelope No. 81172613

By: Auto Clerk Filed: 10/31/2023 7:17 PM

SUIT NO.	
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CITY OF HOUSTON, ET AL	§	IN THE DISTRICT COURT
	§	
VS.	§	JUDICIAL DISTRICT
	§	
PIR ENTERPRISE LLC AKA PIR	§	HARRIS COUNTY, TEXAS
ENTERPRISES LLC. ET AL	Ü	, A

## **ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

I.

### **PLAINTIFF(S)**

This suit is brought for the recovery of delinquent ad valorem taxes under TEX. TAX CODE § 33.41 by the following named Plaintiff(s), whether one or more, each of which is a taxing unit and is legally constituted and authorized to impose and collect taxes on property:

# CITY OF HOUSTON, HOUSTON INDEPENDENT SCHOOL DISTRICT and HOUSTON COMMUNITY COLLEGE SYSTEM

The Plaintiff(s) intends discovery to be conducted under Level 2 of Rule 190, Texas Rules of Civil Procedure.

## **DEFENDANT(S)**

The following are named as Defendant(s) in this suit, and they may be served with notice of these claims by service of citation at the address and in the manner shown as follows:

PIR Enterprise LLC AKA PIR Enterprises LLC, A Texas Limited Liability Company, whose certification of organization was forteited on June 24, 2022 for non-payment of franchise taxes and upon whom service may be obtained by serving its Manager, Nakia Price at 1825 Rosedale Street, Houston, TX 77004;

Kenneth M. Hoyt, AKA Kenneth Michael Hoyt (In Rem Only), 3334 South MacGregor Way, Houston, TX 77021;

Veola L. Hoyt, AKA Veola Johnson Hoyt (In Rem Only), 3334 South MacGregor Way, Houston, TX 77021;

Unity National Bank, A Financial Institution (In Rem Only), upon whom service may be obtained by serving its President, Michael Pearson at 2602 Blodgett Street, Houston, TX 77004

If any party is shown at an unknown address, the Defendant(s) include such person's unknown heirs, successors and assigns, whose identity and location are unknown, unknown owners, such unknown owner's heirs, successors and assigns, and any and all other persons, including adverse claimants, owning or having or claiming any legal or equitable interest in or lien upon the property which is the subject of the delinquent tax claim in this case.

The following taxing unit(s), whether one or more, is joined as a party herein as required by TEX. TAX CODE § 33.44(a) because it may have a claim and lien for delinquent taxes against all or part of the same property described below: HARRIS COUNTY, and for certain county-wide taxing authorities which are the Harris County Department of Education, the Port of Houston Authority of Harris County, the Harris County Flood Control District, and the Harris County Hospital District, all of which are included within the references to Harris County made herein and GREATER SOUTHEAST MANAGEMENT DISTRICT. The foregoing named taxing unit(s), if any, is invited to add its claim by intervening herein.

II.

Claims for all taxes becoming delinquent on said property at any time subsequent to the filing of this suit, up to the day of judgment, including all penalties, interest, attorney's fees, and costs on same, are incorporated in this suit, and Plaintiff(s) is entitled to recover the same, upon proper proof, without further citation or notice. Plaintiff(s) is further entitled to recover each penalty that is incurred and all interest that accrues on all delinquent taxes imposed on the property from the date of judgment to the date of sale.

III.

As to each separately described property shown below, there are delinquent taxes, penalties, interest, and costs justly due, owing and unpaid to Plaintiff(s) for the tax years and in the amounts as follows, if paid in October, 2023:

## **PROPERTY AND AMOUNTS OWED**

ACCT. NO.0610940000033; Lot 33 in Block of Riverside Terrace, Section 1, a subdivision in Harris County, Texas according to the map or plat thereof recorded in Volume 6, Page 64 of the Map Records of Harris County, Texas.

CITY	$\mathbf{OE}$	$\mathbf{H}\mathbf{O}$	HCTA	M

HOU New Petition Real Only

CITY OF HOUS	STON			
	Tax Year(s)	Tax Amount	Penalties and Interest	<b>Total Due</b>
	2022	\$3,676.04	\$1,661.57	\$5,337.61
TOTALS:		\$3,676.04	\$1,661.57	\$5,337.61
HOUSTON IND	DEPENDENT SC	HOOL DISTRICT		
	Tax Year(s)	Tax Amount	Penalties and Interest	Total Due
	2022	\$7,144.87	\$3,229.48	\$10,374.35
TOTALS:	$\diamond$	\$7,144.87	\$3,229.48	\$10,374.35
HOUSTON CO	MMUNITY COL	LEGE SYSTEM		
	Tax Year(s)	Tax Amount	Penalties and Interest	<b>Total Due</b>
	2022	\$658.34	\$297.57	\$955.91
TOTALS:		\$658.34	\$297.57	\$955.91
TOTAL DUE				\$16,667,87

Page 2

The total aggregate amount of taxes, penalties, interest, and attorney's fees (if any) for which Plaintiff(s) sues is \$16,667.87, subject to additional taxes, penalties, interest, and attorney's fees that accrue subsequent to the filing of this petition.

IV.

All of the taxes were authorized by law and legally imposed in the county in which this suit is brought. The taxes were imposed in the amount(s) stated above on each separately described property for each year specified and on each person named, if known, who owned the property on January 1 of the year for which the tax was imposed. Plaintiff(s) now has and asserts a lien of each tract of real property and each item of personal property described herein to secure the payment of all taxes, penalties, interest and costs due. Pursuant to Rule 54 of the Texas Rules of Civil Procedure, Plaintiff(s) affirmatively avers that all things required by law to be done have been done properly by the appropriate officials and all conditions precedent have been met.

V.

All of the property described above was, at the time the taxes were assessed, located within the territorial boundaries of each taxing unit in whose behalf this suit is brought. All Defendants named in this suit either owned the property that is the subject of this suit on January 1 of the year in which taxes were imposed on said property, or owned or claimed an interest in or lien upon said property at the time of the filing of this suit. The value of any personal property that may be described above, and against which the tax lien is sought to be enforced, is in excess of FIVE HUNDRED AND NO/100 DOLLARS (\$500.00).

WF.

The Law Firm represented by the attorney whose name is signed hereto is legally authorized and empowered to institute and prosecute this action on behalf of Plaintiff(s). Plaintiff(s) should recover attorney's fees as provided by law for the prosecution of this case, and such attorney's fees should be taxed as costs.

VII.

Plaintiff(s) may have incurred certain expenses in the form of abstractor's costs in procuring data and information as to the name, identity and location of necessary parties, and in procuring necessary legal descriptions of the property that is the subject of this suit. Said expenses, if incurred, are reasonable and are in the following amount: \$300.00. The abstractor's costs, if any be shown, should be taxed as costs herein.

#### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff(s) requests that citation be issued and served upon each Defendant named herein, commanding them to appear and answer herein in the time and manner required by law. Plaintiff(s) further prays, upon final hearing in this cause, for foreclosure of its liens against the above-described property securing the total amount of all delinquent taxes, penalties and interest, including taxes, penalties and interest becoming delinquent during the pendency of this suit, costs of court, attorney's fees, abstract fees, and expenses of foreclosure sale. Plaintiff(s) further prays for personal judgment against Defendant(s) who owned the property on January 1 of the year for which the taxes were imposed for all taxes, penalties, interest, and costs that are due or will become due on the property, together with attorney's fees and abstractor's fees. Plaintiff(s) further

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prays for: (1) the appropriate order of sale requiring the foreclosed property to be sold, free and clear of any right, title or interest owned or held by any of the named Defendants, at public auction in the manner prescribed by law, and (2) writs of execution, directing the sheriffs and constables for the State of Texas, to search out, seize, and sell sufficient property of the Defendant(s) against whom personal judgment may be awarded to satisfy the lawful judgment sought herein. Finally, Plaintiff(s) prays for such other and further relief, at law or in equity, to which it may show itself justly entitled. However, Plaintiff(s) do not pray for personal judgment against any defendant(s) identified in paragraph I as IN REM ONLY. Plaintiff(s) pray for costs of court and for such other and further relief, at law or in equity, to which they may show themselves justly entitled.

Respectfully submitted,

LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO Box 3064 Houston, TX 77253-3064 (713) 844-3580 (713) 844-3502 - Fax

Margaret Alfred

Margaret. Alfred lgbs.com

State Bar No. 24104378

Angelica M. Hernandez

State Bar No. 00797872

Damon D. Edwards

State Bar No. 24027156

Cinthya Pena Reade

Cinthya.Reade@lgbs.com

State Bar No. 24110206

Attorneys for Plaintiff(s)

Precinct No. 07 Deputy No. 7c11

STATE OF TEXAS COUNTY OF HARRIS

IN ADDITION TO THE DELINQUENT TAXES THERE ARE COURT COSTS ASSESSED BY THE DISTRICT CLERK'S OFFICE. FOR COURT COST INFORMATION ONLY CALL (713) 755-5711. FOR TAX AMOUNTS CALL YOUR TAX OFFICE. FOR QUESTIONS CONCERNING THIS LAWSUIT CALL THE ATTORNEY LISTED IN THE PETITION.

Trackin	g No. SU.	IT NO	
TO:	PIR Enterprise LLC AKA PIR Enterprises LLC, A Texas Limited L was forfeited on June 24, 2022 for non-payment of franchise taxe its Manager, Nakia Price at 1825 Rosedale Street, Houston, TX 770 (Harris County)	s and upon whom service may be of	
issued to be taken suit.	TING: YOU HAVE BEEN SUED. You may employ an attorney. If you or his citation by 10:00 a.m. on the Monday next after the expiration of 20 day a against you. In addition to filing a written answer with the clerk, you may these disclosures generally must be made no later than 30 days after awHelp.org.	s after you were served this citation, a obe required to make initial disclosures t	default judgment may o other parties of this
District expirati	RE HEREBY COMMANDED to appear and answer, by filing a written are, Harris County, Texas, at the Courthouse of said county in Houston, Texas on of 20 days from the date of service of this citation, then and there to f(s), filed in said Court on the 31st day of October, 2023, against <b>PIR ENTE</b>	is, at or before 10 o'clock a.m. of the Moon of the Moon of CITY OF I	Monday next after the IOUSTON, ET AL,
incurred	nure of the suit is a demand to collect delinquent ad valorem taxes, penalty on the property described in Plaintiff(s) Petition, a true and correct condition.		
33 in B	ount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the clock 2 of Riverside Terrace, Section 1, a subdivision in Harris County, to 6, Page 64 of the Map Records of Harris County, Texas Account No. (	Texas according to the map or plat	
and for County Harris ( and join	nes of all taxing units that assess and collect taxes on said property, other certain county-wide taxing authorities which are the Harris County Depart, the Harris County Flood Control District, and the Harris County Hospital County made herein and GREATER SOUTHEAST MANAGEMENT DISTRICT as parties to this suit and invited to add their claim by intervening herein aperty that Plaintiff(s) has failed to join as a party to this suit.	ment of Education, the Port of Housto District, all of which are included wi RICT. The foregoing taxing units, if an	n Authority of Harris thin the references to y be shown, are made
addition judgme	f and all other taxing units who may set up their tax claims herein seek rec a to the taxes, all interest, penalties, attorney fees, abstractor costs and c ant, post judgment interest at the maximum rate allowed by law and the est is provided by law.	ourt costs allowed by law up to and	ncluding the date of
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If this c	itation is not served within 90 days after the date of its issuance, it shall be re	turned unserved.	
	OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS ROUNG TO THE REQUIREMENTS OF LAW AND THE MANDATES IS.		
Issued a	and given under my hand and seal of said Court at Houston, Texas, this the _	day of	, 20
PO Box Houston (713) 8	n, TX 77253-3064 44-3580; (713) 844-3502 - FAX	MARILYN BURGESS CLERK OF THE DISTRICT COURT OF HARRIS COUNTY, TEXAS 201 CAROLINE 4TH FLOOR HOUSTON, TX 77002	TS.
ATTOF	RNEY FOR PLAINTIFF		

		SUIT NO. OFFI	CER'S RETURN
CAME TO HA	AND on the County, Texa	day of as, by delivering in perso	on, a true copy of this citation and petition; to the following Defendant at time
and place, to-wit:			
DATE	TIME —	AM/PM M.	PIR Enterprise LLC AKA PIR Enterprises LLC, A Texas Limited Liability Company, whose certification of organization was forfeited on June 24, 2022 for non-payment of franchise taxes and upon whom service may be obtained by serving its Manager, Nakia Price at
Where Delivered	, if different than tha	nt shown:	1825 Rosedale Street, Houston, TX 77004 (Harris County)
			Sheriff/Constable County, Texas
Deputy	. U U U U U U U U U U U U U U U U U U U	\	***********
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		ALIEI	RNATE RETURN
	(Con	nplete this Alternate Re	eturn only if unable to locate defendant)
CAME TO HAN	D on the day of		,, ato'clockM. and after due and diligent search, I
HAVE BEEN UN	NABLE TO LOCATE t	he within named Defend	dant in County, nor have I been able to learn their
whereabouts exce			
			NOTICE
	* I	f Substituted Service of	Citation is required on this Defendant *
		The Courts	s require the following:
	1. <i>A MINI</i>	MUM OF SIX (6) ATTE	MPTS FOR SERVICE OVER
	A TWO (	2) WEEK PERIOD. 🚿	
	2. These att	empts cannot be on cons	ecutive days.
		g, afternoon and evening	ade at different hours of the day
	<ol><li>Provide a</li></ol>	written explanation of w	what occurred on each attempt at service.
	5. Do not us	se abbreviations	
DATE	TIME	AM/PM	EXPLANATION
DAIL		ANATIVI	EAILANATION
		<u> </u>	
			Sheriff/Constable
		D-	
		By	HARRIS COUNTY, TEXAS
			Deputy
			Deputy

Precinct No. 07 Deputy No. 7c14

STATE OF TEXAS COUNTY OF HARRIS

ATTORNEY FOR PLAINTIFF

IN ADDITION TO THE DELINQUENT TAXES THERE ARE COURT COSTS ASSESSED BY THE DISTRICT CLERK'S OFFICE. FOR COURT COST INFORMATION ONLY CALL (713) 755-5711. FOR TAX AMOUNTS CALL YOUR TAX OFFICE. FOR QUESTIONS CONCERNING THIS LAWSUIT CALL THE ATTORNEY LISTED IN THE PETITION.

Trackin	g No. SU	IT NO
TO:	Kenneth M. Hoyt AKA Kenneth Michael Hoyt (In Rem Only) 3334 South MacGregor Way Houston, TX 77021 (Harris County)	
issued to be taken suit.	TING: YOU HAVE BEEN SUED. You may employ an attorney. If you or his citation by 10:00 a.m. on the Monday next after the expiration of 20 day a against you. In addition to filing a written answer with the clerk, you may these disclosures generally must be made no later than 30 days after awHelp.org.	s after you were served this citation, a default judgment may be required to make initial disclosures to other parties of this
District, expiration	RE HEREBY COMMANDED to appear and answer, by filing a written at Harris County, Texas, at the Courthouse of said county in Houston, Texas on of 20 days from the date of service of this citation, then and there is a fixed in said Court on the 31st day of October, 2023, against <b>PIR ENTE</b>	as, at orbefore 10 o'clock a.m. of the Monday next after the or answer the Petition of CITY OF HOUSTON, ET AL,
incurred	ure of the suit is a demand to collect delinquent ad valorem taxes, penalt on the property described in Plaintiff(s) Petition, a true and correct cop d verbatim.	ies, interest, attorney's fees, court costs and abstractor's fees y of which is attached hereto and incorporated herein as if
33 in B	ount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is t lock 2 of Riverside Terrace, Section 1, a subdivision in Harris County e 6, Page 64 of the Map Records of Harris County, Texas. Account No.	, Texas according to the map or plat thereof recorded in
and for County, Harris C and join	nes of all taxing units that assess and collect taxes on said property, other certain county-wide taxing authorities which are the Harris County Depar the Harris County Flood Control District, and the Harris County Hospita County made herein and GREATER SOUTHEAST MANAGEMENT DIST. and as parties to this suit and invited to add their claim by intervening herein perty that Plaintiff(s) has failed to join as a part to this suit.	tment of Education, the Port of Houston Authority of Harris I District, all of which are included within the references to RICT. The foregoing taxing units, if any be shown, are made
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all taxes by law i	ies to this suit shall take notice that claims not only for any taxes which were becoming delinquent at any time thereafter up to the day of judgment, income the recovered without further citation or notice to any parties and all parties now on file and which may be filed in this cause by all other parties and be neir tax claims against the property.	luding all interest, penalties, attorney fees, and costs allowed ies shall take notice of and plead and answer to all claims and
If this c	itation is not served within 90 days after the date of its issuance, it shall be re	eturned unserved.
THE C ACCOR DIRECT	OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS RDING TO THE REQUIREMENTS OF LAW AND THE MANDATE: TS.	RETURN SHALL PROMPTLY SERVE THE SAME SHEREOF AND MAKE DUE RETURN AS THE LAW
Issued a	and given under my hand and seal of said Court at Houston, Texas, this the _	day of, 20
PO Box Houston	ARGER GOGGAN BLAIR & SAMPSON, LLP : 3064 n, TX 77253-3064 14-3580; (713) 844-3502 - FAX	MARILYN BURGESS CLERK OF THE DISTRICT COURTS OF HARRIS COUNTY, TEXAS 201 CAROLINE 4TH FLOOR HOUSTON, TX 77002

		SUIT NO. OFI	FICER'S RETURN
CAME TO HA	ND on the	lay of	
and place, to-wit:	County, Texas	, by delivering in per	rson, a true copy of this citation and petition; to the following Defendant at time
DATE	TIME	AM/PM M.	3334 South MacGregor Way Houston, TX 77021
Where Delivered,	if different than that	shown:	(Harris County)
			Sheriff/Constable
Ву:			County, Texas
Deputy			
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	(Com.		Return only if unable to locate defendant)
CAME TO HAND HAVE BEEN UN whereabouts excep	* If S  1. A MINIMO A TWO (2)  2. These attem 3. Each attem ( morning, 4. Provide a w	Substituted Service of The Country of SIX (6) ATT WEEK PERIOD. Inputs cannot be on country at service must be afternoon and evention.	NOTICE  of Citation is required on this Defendant *  arts require the following:  TEMPES FOR SERVICE OVER  ansecutive days.  anade at different hours of the day
DATE	TIME	AM/PM	EXPLANATION
	\$. OF		
			Sheriff/Constable
		D	
		Ву	HARRIS COUNTY, TEXAS Deputy

Precinct No. 07 Deputy No. 7c14

STATE OF TEXAS COUNTY OF HARRIS

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Trackin	g No.	SUIT NO	
TO:	Veola L. Hoyt AKA Veola Johnson Hoyt (In Rem Only) 3334 South MacGregor Way Houston, TX 77021 (Harris County)		
issued to be taken suit.	TING: YOU HAVE BEEN SUED. You may employ an atto his citation by 10:00 a.m. on the Monday next after the expira against you. In addition to filing a written answer with the These disclosures generally must be made no later than awHelp.org.	rney. If you or your attorney do not file a written answe ration of 20 days after you were served this citation, a doclerk, you may be required to make initial disclosures to	efault judgment may other parties of this
District expirati	RE HEREBY COMMANDED to appear and answer, by fil, Harris County, Texas, at the Courthouse of said county in on of 20 days from the date of service of this citation, tlf(s), filed in said Court on the 31st day of October, 2023, again	Houston, Texas, at or before 10 o'clock a.m. of the Men and there to answer the Petition of CITY OF Ho	onday next after the OUSTON, ET AL,
incurred	ure of the suit is a demand to collect delinquent ad valorer d on the property described in Plaintiff(s) Petition, a true a d verbatim.		
33 in B	ount of taxes due Plaintiff(s), exclusive of interest, penalties clock 2 of Riverside Terrace, Section 1, a subdivision in le 6, Page 64 of the Map Records of Harris County, Texas.	Havris County, Texas according to the map or plat t	
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If this c	itation is not served within 90 days after the date of its issuan	ce, it shall be returned unserved.	
THE C ACCOR DIREC	OFFICER OR OTHER AUTHORIZED PERSON EXEC RDING TO THE REQUIREMENTS OF LAW AND THI TS.	CUTING THIS RETURN SHALL PROMPTLY SE E MANDATES HEREOF AND MAKE DUE RETUR	RVE THE SAME RN AS THE LAW
Issued a	and given under my hand and seal of said Court at Houston, T	exas, this the day of	, 20
PO Box Houston (713) 84	n, TX 77253-3064 44-3580; (713) 844-3502 - FAX	MARILYN BURGESS CLERK OF THE DISTRICT COURTS OF HARRIS COUNTY, TEXAS 201 CAROLINE 4TH FLOOR HOUSTON, TX 77002	S
ATTOR	RNEY FOR PLAINTIFF		

		SUIT NO. OFF	FICER'S RETURN
CAME TO HA	ND on the	lay of	, ato'clockM. and executed in rson, a true copy of this citation and petition; to the following Defendant at time
and place, to-wit:	County, Texas	by delivering in per	rson, a true copy of this citation and petition; to the following Defendant at time
DATE	TIME	AM/PM M.	3334 South MacGregor Way Houston, TX 77021
Where Delivered,	if different than that	shown:	(Harris County)
			Sheriff/Constable
Ву:			County, Texas
Deputy			
******	*******		*************  ERNATE RETURN
	(Co		Return only if unable to locate defendant)
CAME TO HAND HAVE BEEN UN whereabouts excep	* If a minima A TWO (2) 2. These atten 3. Each attem ( morning, 4. Provide a v	Substituted Service o The Cou UM OF SIX (6) ATT WEEK PERIOD. npts cannot be on con pt at service must be afternoon and even	NOTICE  If Citation is required on this Defendant * rts require the following:  TEMPTS FOR SERVICE OVER  USECUTIVE days.  Quade at different hours of the day
DATE	TIME	AM/PM	EXPLANATION
			Sheriff/Constable
		T.	2
		Ву	HARRIS COUNTY, TEXAS Deputy

Precinct No. 07 Deputy No. 7c11

STATE OF TEXAS COUNTY OF HARRIS

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Tracking No. SU	IT NO
TO: Unity National Bank, A Financial Institution (In Rem Only), upon v Michael Pearson at 2602 Blodgett Street, Houston, TX 77004 (Harris County)	whom service may be obtained by serving its President,
GREETING: YOU HAVE BEEN SUED. You may employ an attorney. If you or issued this citation by 10:00 a.m. on the Monday next after the expiration of 20 day be taken against you. In addition to filing a written answer with the clerk, you may suit. These disclosures generally must be made no later than 30 days after TexasLawHelp.org.	s after you were served this citation, a default judgment may be required to make initial disclosures to other parties of this
YOU ARE HEREBY COMMANDED to appear and answer, by filing a written ar District, Harris County, Texas, at the Courthouse of said county in Houston, Texa expiration of 20 days from the date of service of this citation, then and there t Plaintiff(s), filed in said Court on the 31st day of October, 2023, against <b>PIR ENTE</b>	is, at or before 10 o'clock a.m. of the Monday next after the o answerthe Petition of CITY OF HOUSTON, ET AL,
The nature of the suit is a demand to collect delinquent ad valorem taxes, penalti incurred on the property described in Plaintiff(s) Petition, a true and correct coprepeated verbatim.	
The amount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the state of the Map Records of Harris County, Volume 6, Page 64 of the Map Records of Harris County, Texas.; Account No. 6	, Texas according to the map or plat thereof recorded in
The names of all taxing units that assess and collect taxes on said property, other tand for certain county-wide taxing authorities which are the Harris County Depart County, the Harris County Flood Control District, and the Harris County Hospital Harris County made herein and GREATER SOUTHEAST MANAGEMENT DISTR and joined as parties to this suit and invited to add their claim by intervening herein said property that Plaintiff(s) has failed to join as a party to this suit.	ement of Education, the Port of Houston Authority of Harris I District, all of which are included within the references to RICT. The foregoing taxing units, if any be shown, are made
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All parties to this suit shall take notice that claims not only for any taxes which were all taxes becoming delinquent at any time thereafter up to the day of judgment, inc by law may be recovered without further citation or notice to any parties and all part pleadings now on file and which may be filed in this cause by all other parties and b set up their tax claims against the property.	luding all interest, penalties, attorney fees, and costs allowed ies shall take notice of and plead and answer to all claims and
If this citation is not served within 90 days after the date of its issuance, it shall be re	eturned unserved.
THE OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS ACCORDING TO THE REQUIREMENTS OF LAW AND THE MANDATES DIRECTS.	
Issued and given under my hand and seal of said Court at Houston, Texas, this the _	day of, 20
LINEBARGER GOGGAN BLAIR & SAMPSON, LLP PO Box 3064 Houston, TX 77253-3064 (713) 844-3580; (713) 844-3502 - FAX ATTORNEY FOR PLAINTIFF	MARILYN BURGESS CLERK OF THE DISTRICT COURTS OF HARRIS COUNTY, TEXAS 201 CAROLINE 4TH FLOOR HOUSTON, TX 77002

		SUIT NO	
		OFFIC	CER'S RETURN
CAME TO HA	ND on the	day of	n, a true copy of this citation and petition; to the following Defendant at time
and place, to-wit:		s, s, <b>s</b> === p === p === s	, a cut top, or and remain police, to all relative and a continuous and a
DATE	TIME —	AM/PM M.	Unity National Bank, A Financial Institution (In Rem Only), upon whom service may be obtained by serving its President, Michael Pearson at 2602 Blodgett Street, Houston, TX 77004 (Harris County)
Where Delivered,	if different than that	t shown:	
			Sheriff/Constable
By:			County, Texas
Deputy			***********
****		ALTER	turn only if unable to locate (lefendant)
			-
CAME TO HAND HAVE BEEN UN whereabouts excep	O on the day of _ TABLE TO LOCATE the ot as follows:		ant in, at, atM. and after due and diligent search, I County, nor have I been able to learn their
			NOTICE
	* If		Citation is required on this Defendant * require the following:
	A TWO (2 2. These atte 3. Each atten ( morning 4. Provide a	e) WEEK PERIOD. mpts cannot be on consempt at service must be many afternoon and evening)	de at different hours of the day
DATE	TIME	AM/PM	EXPLANATION
			Sheriff/Constable
		$\mathbf{B}\mathbf{y}$	
		2,	HARRIS COUNTY, TEXAS Deputy
			Doparty