

SUIT NO. _____

CITY OF HOUSTON, ET AL

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§
§

IN THE DISTRICT COURT

VS.

_____ JUDICIAL DISTRICT

PIR ENTERPRISE LLC AKA PIR
ENTERPRISES LLC, ET AL

HARRIS COUNTY, TEXAS

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 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 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.061094000033; Lot 33 in Block 2 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 OF HOUSTON

Tax Year(s)	Tax Amount	Penalties and Interest	Total Due
2022	\$3,676.04	\$1,661.57	\$5,337.61
TOTALS:	\$3,676.04	\$1,661.57	\$5,337.61

HOUSTON INDEPENDENT SCHOOL DISTRICT

Tax Year(s)	Tax Amount	Penalties and Interest	Total Due
2022	\$7,144.87	\$3,229.48	\$10,374.35
TOTALS:	\$7,144.87	\$3,229.48	\$10,374.35

HOUSTON COMMUNITY COLLEGE SYSTEM

Tax Year(s)	Tax Amount	Penalties and Interest	Total Due
2022	\$658.34	\$297.57	\$955.91
TOTALS:	\$658.34	\$297.57	\$955.91

TOTAL DUE **\$16,667.87**

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 on 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).

VI.

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.

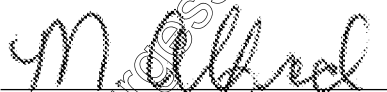
PRAYER

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

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
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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)

Unofficial Copy Office of Maricopa County Superior Court Clerk

CITATION

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.

Tracking No. _____

SUIT NO. _____

TO: 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 1825 Rosedale Street, Houston, TX 77004 (Harris County)

GREETING: YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next after the expiration of 20 days after you were served this citation, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

YOU ARE HEREBY COMMANDED to appear and answer, by filing a written answer, before the Honorable District Court, _____ Judicial District, Harris County, Texas, at the Courthouse of said county in Houston, Texas, at or before 10 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service of this citation, then and there to answer the Petition of **CITY OF HOUSTON, ET AL**, Plaintiff(s), filed in said Court on the 31st day of October, 2023, against **PIR ENTERPRISE LLC AKA PIR ENTERPRISES LLC, ET AL**.

The nature of the suit is a demand to collect delinquent ad valorem taxes, penalties, interest, attorney's fees, court costs and abstractor's fees incurred on the property described in Plaintiff(s) Petition, a true and correct copy of which is attached hereto and incorporated herein as if repeated verbatim.

The amount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the sum of **\$11,479.25**, said property being described as: **Lot 33 in Block 2 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. Account No. 061094000033**

The names of all taxing units that assess and collect taxes on said property, other than the Plaintiff(s) named above, are: 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 taxing units, if any be shown, are made and joined as parties to this suit and invited to add their claim by intervening herein. There are no taxing units which assess and collect taxes on said property that Plaintiff(s) has failed to join as a party to this suit.

Plaintiff and all other taxing units who may set up their tax claims herein seek recovery of delinquent ad valorem taxes on the property and in addition to the taxes, all interest, penalties, attorney fees, abstractor costs and court costs allowed by law up to and including the date of judgment, post judgment interest at the maximum rate allowed by law and the establishment and foreclosure of liens securing the payment of same, as provided by law.

All parties to this suit shall take notice that claims not only for any taxes which were delinquent on the property at the time this suit was filed but all taxes becoming delinquent at any time thereafter up to the day of judgment, including all interest, penalties, attorney fees, and costs allowed by law may be recovered without further citation or notice to any parties and all parties shall take notice of and plead and answer to all claims and pleadings now on file and which may be filed in this cause by all other parties and by all those taxing units above named, who may intervene and set up their tax claims against the property.

If this citation is not served within 90 days after the date of its issuance, it shall be returned unserved.

THE OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS RETURN SHALL PROMPTLY SERVE THE SAME ACCORDING TO THE REQUIREMENTS OF LAW AND THE MANDATES HEREOF AND MAKE DUE RETURN AS THE LAW 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

MARILYN BURGESS
CLERK OF THE DISTRICT COURTS
OF HARRIS COUNTY, TEXAS
201 CAROLINE 4TH FLOOR
HOUSTON, TX 77002

ATTORNEY FOR PLAINTIFF

By: _____
Deputy

SUIT NO. _____
OFFICER'S RETURN

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock __.M. and executed in _____ County, Texas, by delivering in person, a true copy of this citation and petition, to the following Defendant at time and place, to-wit:

DATE	TIME	AM/PM	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 1825 Rosedale Street, Houston, TX 77004 (Harris County)
_____	_____	____.M.	

Where Delivered, if different than that shown:

 Sheriff/Constable

By: _____ County, Texas
 Deputy

ALTERNATE RETURN

(Complete this Alternate Return only if unable to locate defendant)

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock __.M. and after due and diligent search, I HAVE BEEN UNABLE TO LOCATE the within named Defendant in _____ County, nor have I been able to learn their whereabouts except as follows:

NOTICE

* If Substituted Service of Citation is required on this Defendant *
 The Courts require the following:

1. **A MINIMUM OF SIX (6) ATTEMPTS FOR SERVICE OVER A TWO (2) WEEK PERIOD.**
2. These attempts cannot be on consecutive days.
3. Each attempt at service must be made at different hours of the day (morning, afternoon and evening)
4. Provide a written explanation of what occurred on each attempt at service.
5. Do not use abbreviations.

DATE	TIME	AM/PM	EXPLANATION

 Sheriff/Constable

By _____
 HARRIS COUNTY, TEXAS
 Deputy

CITATION

Precinct No. 07
Deputy No. 7c14

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.

Tracking No. _____

SUIT NO. _____

TO: Kenneth M. Hoyt
AKA Kenneth Michael Hoyt (In Rem Only)
3334 South MacGregor Way
Houston, TX 77021
(Harris County)

GREETING: YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next after the expiration of 20 days after you were served this citation, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

YOU ARE HEREBY COMMANDED to appear and answer, by filing a written answer, before the Honorable District Court, _____ Judicial District, Harris County, Texas, at the Courthouse of said county in Houston, Texas, at or before 10 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service of this citation, then and there to answer the Petition of **CITY OF HOUSTON, ET AL**, Plaintiff(s), filed in said Court on the 31st day of October, 2023, against **PIR ENTERPRISE LLC AKA PIR ENTERPRISES LLC, ET AL**.

The nature of the suit is a demand to collect delinquent ad valorem taxes, penalties, interest, attorney's fees, court costs and abstractor's fees incurred on the property described in Plaintiff(s) Petition, a true and correct copy of which is attached hereto and incorporated herein as if repeated verbatim.

The amount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the sum of **\$11,479.25**, said property being described as: **Lot 33 in Block 2 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. Account No. 061094000033**

The names of all taxing units that assess and collect taxes on said property, other than the Plaintiff(s) named above, are: 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 taxing units, if any be shown, are made and joined as parties to this suit and invited to add their claim by intervening herein. There are no taxing units which assess and collect taxes on said property that Plaintiff(s) has failed to join as a party to this suit.

Plaintiff and all other taxing units who may set up their tax claims herein seek recovery of delinquent ad valorem taxes on the property and in addition to the taxes, all interest, penalties, attorney fees, abstractor costs and court costs allowed by law up to and including the date of judgment, post judgment interest at the maximum rate allowed by law and the establishment and foreclosure of liens securing the payment of same, as provided by law.

All parties to this suit shall take notice that claims not only for any taxes which were delinquent on the property at the time this suit was filed but all taxes becoming delinquent at any time thereafter up to the day of judgment, including all interest, penalties, attorney fees, and costs allowed by law may be recovered without further citation or notice to any parties and all parties shall take notice of and plead and answer to all claims and pleadings now on file and which may be filed in this cause by all other parties and by all those taxing units above named, who may intervene and set up their tax claims against the property.

If this citation is not served within 90 days after the date of its issuance, it shall be returned unserved.

THE OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS RETURN SHALL PROMPTLY SERVE THE SAME ACCORDING TO THE REQUIREMENTS OF LAW AND THE MANDATES HEREOF AND MAKE DUE RETURN AS THE LAW 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

MARILYN BURGESS
CLERK OF THE DISTRICT COURTS
OF HARRIS COUNTY, TEXAS
201 CAROLINE 4TH FLOOR
HOUSTON, TX 77002

ATTORNEY FOR PLAINTIFF

By: _____
Deputy

SUIT NO. _____
OFFICER'S RETURN

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock ____ M. and executed in _____ County, Texas, by delivering in person, a true copy of this citation and petition, to the following Defendant at time and place, to-wit:

DATE	TIME	AM/PM	Kenneth M. Hoyt
_____	_____	____.M.	AKA Kenneth Michael Hoyt (In Rem Only)
			3334 South MacGregor Way
			Houston, TX 77021
			(Harris County)

Where Delivered, if different than that shown:

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By: _____ County, Texas
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(Complete this Alternate Return only if unable to locate defendant)

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By _____
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 Deputy

CITATION

Precinct No. 07
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STATE OF TEXAS
COUNTY OF HARRIS

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Tracking No. _____

SUIT NO. _____

TO: Veola L. Hoyt
AKA Veola Johnson Hoyt (In Rem Only)
3334 South MacGregor Way
Houston, TX 77021
(Harris County)

GREETING: YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next after the expiration of 20 days after you were served this citation, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

YOU ARE HEREBY COMMANDED to appear and answer, by filing a written answer, before the Honorable District Court, _____ Judicial District, Harris County, Texas, at the Courthouse of said county in Houston, Texas, at or before 10 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service of this citation, then and there to answer the Petition of **CITY OF HOUSTON, ET AL**, Plaintiff(s), filed in said Court on the 31st day of October, 2023, against **PIR ENTERPRISE LLC AKA PIR ENTERPRISES LLC, ET AL**.

The nature of the suit is a demand to collect delinquent ad valorem taxes, penalties, interest, attorney's fees, court costs and abstractor's fees incurred on the property described in Plaintiff(s) Petition, a true and correct copy of which is attached hereto and incorporated herein as if repeated verbatim.

The amount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the sum of **\$11,479.25**, said property being described as: **Lot 33 in Block 2 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. Account No. 0610940000033**

The names of all taxing units that assess and collect taxes on said property, other than the Plaintiff(s) named above, are: 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 taxing units, if any be shown, are made and joined as parties to this suit and invited to add their claim by intervening herein. There are no taxing units which assess and collect taxes on said property that Plaintiff(s) has failed to join as a party to this suit.

Plaintiff and all other taxing units who may set up their tax claims herein seek recovery of delinquent ad valorem taxes on the property and in addition to the taxes, all interest, penalties, attorney fees, abstractor costs and court costs allowed by law up to and including the date of judgment, post judgment interest at the maximum rate allowed by law and the establishment and foreclosure of liens securing the payment of same, as provided by law.

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Houston, TX 77253-3064
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MARILYN BURGESS
CLERK OF THE DISTRICT COURTS
OF HARRIS COUNTY, TEXAS
201 CAROLINE 4TH FLOOR
HOUSTON, TX 77002

ATTORNEY FOR PLAINTIFF

By: _____
Deputy

SUIT NO. _____
OFFICER'S RETURN

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock ____ M. and executed in _____ County, Texas, by delivering in person, a true copy of this citation and petition, to the following Defendant at time and place, to-wit:

DATE	TIME	AM/PM	Veola L. Hoyt
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CITATION

Precinct No. 07
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STATE OF TEXAS
COUNTY OF HARRIS

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Tracking No.

SUIT NO. _____

TO: 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)

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The amount of taxes due Plaintiff(s), exclusive of interest, penalties, and costs, is the sum of \$11,479.25, said property being described as: Lot 33 in Block 2 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; Account No. 0610940000033

The names of all taxing units that assess and collect taxes on said property, other than the Plaintiff(s) named above, are: 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 taxing units, if any be shown, are made and joined as parties to this suit and invited to add their claim by intervening herein. There are no taxing units which assess and collect taxes on said property that Plaintiff(s) has failed to join as a party to this suit.

Plaintiff and all other taxing units who may set up their tax claims herein seek recovery of delinquent ad valorem taxes on the property and in addition to the taxes, all interest, penalties, attorney fees, abstractor costs and court costs allowed by law up to and including the date of judgment, post judgment interest at the maximum rate allowed by law and the establishment and foreclosure of liens securing the payment of same, as provided by law.

All parties to this suit shall take notice that claims not only for any taxes which were delinquent on the property at the time this suit was filed but all taxes becoming delinquent at any time thereafter up to the day of judgment, including all interest, penalties, attorney fees, and costs allowed by law may be recovered without further citation or notice to any parties and all parties shall take notice of and plead and answer to all claims and pleadings now on file and which may be filed in this cause by all other parties and by all those taxing units above named, who may intervene and set up their tax claims against the property.

If this citation is not served within 90 days after the date of its issuance, it shall be returned unserved.

THE OFFICER OR OTHER AUTHORIZED PERSON EXECUTING THIS RETURN SHALL PROMPTLY SERVE THE SAME ACCORDING TO THE REQUIREMENTS OF LAW AND THE MANDATES HEREOF AND MAKE DUE RETURN AS THE LAW 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

MARILYN BURGESS
CLERK OF THE DISTRICT COURTS
OF HARRIS COUNTY, TEXAS
201 CAROLINE 4TH FLOOR
HOUSTON, TX 77002

ATTORNEY FOR PLAINTIFF

By: _____
Deputy

SUIT NO. _____
OFFICER'S RETURN

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock ____ M. and executed in _____ County, Texas, by delivering in person, a true copy of this citation and petition, to the following Defendant at time and place, to-wit:

DATE	TIME	AM/PM	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)
_____	_____	____.M.	

Where Delivered, if different than that shown:

 Sheriff/Constable

By: _____
 Deputy _____ County, Texas

ALTERNATE RETURN

(Complete this Alternate Return only if unable to locate defendant)

CAME TO HAND on the ____ day of _____, _____, at ____ o'clock ____ M. and after due and diligent search, I HAVE BEEN UNABLE TO LOCATE the within named Defendant in _____ County, nor have I been able to learn their whereabouts except as follows:

NOTICE

* If Substituted Service of Citation is required on this Defendant *
 The Courts require the following:

1. **A MINIMUM OF SIX (6) ATTEMPTS FOR SERVICE OVER A TWO (2) WEEK PERIOD.**
2. These attempts cannot be on consecutive days.
3. Each attempt at service must be made at different hours of the day (morning, afternoon and evening)
4. Provide a written explanation of what occurred on each attempt at service.
5. Do not use abbreviations.

DATE	TIME	AM/PM	EXPLANATION

 Sheriff/Constable

By _____
 HARRIS COUNTY, TEXAS
 Deputy