

June 18, 2024

Judge Cory Sepolio
269th District Court of
Harris County Texas
201 Caroline, 13th Floor
Houston, TX 77002

Via e-filing

Re: Cause No. 2024-28324
Case Style: Angel White, Individually and as Trustee of Nagra Trust v
Hoang Nguyen and Cardinal Financial Company
Subject: Emergency Request for Expedited Hearing

Dear Judge Sepolio:

We are currently set for a Temporary Injunction hearing on this matter on July 12, 2024. Unfortunately, Defendant Hoang Nguyen has jumped the gun and reposted the property to be sold at a foreclosure sale to occur on July 2, 2024 – see attached Notice of Trustee's Sale.

Accordingly, we would respectfully request that the court expedite the Temporary Injunction in order to maintain the status quo of the parties. In the alternative, we request permission to file a new proposed TRO in this matter and have the ancillary court conduct the TRO hearing.

Please advise how you want us to proceed on this issue at your earliest convenience. Thank you in advance for your prompt attention to this matter.

Very truly yours,



Robert C. Vilt

cc: Jason L. Sanders
Keval Patel
Client

Via e-filing
Via e-filing
Via email

HOANG NGUYEN, an individual, Noteholder
August REI, LLC, Loan Servicing Company
Ghrist Law Firm PLLC (hereinafter "Attorney")

Angel White, individually and as trustee of NAGRA TRUST
11819 Nagra Drive, Houston, TX 77065

Sent via first class mail and CMRR # 9489 0178 9820 3031 7035 25 on 06.11.2024

NOTICE OF TRUSTEE'S SALE

WHEREAS Angel White, individually and as trustee of NAGRA TRUST and executed a Deed of Trust conveying to the initial trustee, the real estate hereinafter described, in payment of a debt therein described. The Deed of Trust was filed in the real property records of Harris County, Texas and is recorded under Clerk's File/Instrument Number RP-2022-471765, to which reference is made for all purposes.

WHEREAS, default has occurred in the payment of said indebtedness, and the same is now wholly due, and the owner and holder has requested to sell said property to satisfy said indebtedness;

WHEREAS, the undersigned has been, will be, or is hereby appointed Substitute Trustee in the place of the said original Trustee, upon contingency and in the manner authorized by said Deed of Trust; and

NOW, THEREFORE, NOTICE IS HEREBY GIVEN of the following:

1. Date, Place, and Time of Sale:

Date: Tuesday, the 2nd day of July, 2024

Time: The sale shall begin no earlier than 1:00 P.M. or no later than three hours thereafter.

Place: The foreclosure sale will be conducted at public venue in the area designated by the Harris County Commissioners Court pursuant to Section 51.002 of the Texas Property Code as the place where foreclosure sales are to take place, or if no place is designated by the Commissioner's Court, the sale will be conducted at the area immediately adjacent to the location where the Notice of Trustee's Sale (this notice) was posted.

2. Property to be Sold:

LOT 17, IN BLOCK 1, OF SIGNATURE ESTATES, REPLAT NO. 1, A SUBDIVISION IN HARRIS COUNTY, TEXAS ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN FILM NO. 559134 OF THE MAP RECORDS OF HARRIS COUNTY, TEXAS

3. Name and Address of Sender of Notice:

Ghrist Law Firm, PLLC, 4016 Gateway Drive, Suite 130, Colleyville, Texas, 76034.
The senders of the notice also include those names listed below.

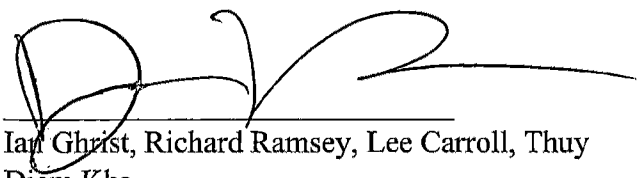
Pursuant to Section 51.009 of the Texas Property Code, the property will be sold in "as is, where is" condition, without any express or implied warranties, except as to the warranties of title (if any) provided for under the deed of trust.

ASSERT AND PROTECT YOUR RIGHTS AS A MEMBER OF THE ARMED FORCES OF THE UNITED STATES. IF YOU ARE OR YOUR SPOUSE IS SERVING ON ACTIVE MILITARY DUTY, INCLUDING ACTIVE MILITARY DUTY AS A MEMBER OF THE TEXAS NATIONAL GUARD OR THE NATIONAL GUARD OF ANOTHER STATE OR AS A MEMBER OF A RESERVE COMPONENT OF THE ARMED FORCES OF THE UNITED STATES, PLEASE SEND WRITTEN NOTICE OF THE ACTIVE MILITARY SERVICE TO THE SENDER OF THIS NOTICE IMMEDIATELY.

Pursuant to Section 51.0025 of the Texas Property Code, the mortgage servicer or Attorney are entitled to administer the foreclosure due to the fact that the servicer, noteholder or Lender, and Attorney have entered into an agreement granting authority to service the mortgage and administer foreclosure proceedings.

THIS INSTRUMENT APPOINTS THE SUBSTITUTE TRUSTEE(S) IDENTIFIED TO SELL THE PROPERTY DESCRIBED IN THE SECURITY INSTRUMENT IDENTIFIED IN THIS NOTICE OF SALE THE PERSON SIGNING THIS NOTICE IS THE ATTORNEY OR AUTHORIZED AGENT OF THE MORTGAGEE OR MORTGAGE SERVICER.

NOTICE OF ACCELERATION. If the maturity on the promissory note has not yet been accelerated, then the lender hereby accelerates the maturity date such that the remaining principal, together with all other charges, are due and owing at this time.



Ian Ghrist, Richard Ramsey, Lee Carroll, Thuy Diem Kha
Substitute Trustee(s)
4016 Gateway Drive, Suite 130
Colleyville, Texas 76034
Phone: (817) 778-4136

FILED 6/11/2024 11:18:26 AM
FRCL-2024-3704
TENESHIA HUDSPETH, COUNTY CLERK, HARRIS COUNTY, TEXAS

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Nicolas Vilt on behalf of Robert Vilt

Bar No. 788586

nicolas@viltlaw.com

Envelope ID: 88930254

Filing Code Description: Amended Filing

Filing Description: Amended Application for Injunctive Relief

Status as of 6/18/2024 2:49 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Nicolas Vilt		nicolas@viltlaw.com	6/18/2024 1:55:17 PM	SENT
Robert C. Vilt		clay@viltlaw.com	6/18/2024 1:55:17 PM	SENT
Keval Patel		kpatel@patel-law.com	6/18/2024 1:55:17 PM	SENT
Laurie mackay		lmackay@patel-law.com	6/18/2024 1:55:17 PM	SENT
Jason LeviSanders		jsanders@sanderscollins.com	6/18/2024 1:55:17 PM	SENT
Caroline EAllen		callen@sanderscollins.com	6/18/2024 1:55:17 PM	SENT

Unofficial Copy Office of Meryn Burgess District Clerk