

CAUSE NO. 2024-34584

TANYA A. PORTER-PUGH
Plaintiff,

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IN THE DISTRICT COURT

VS.

151st JUDICIAL DISTRICT OF

TAX RESCUE II, LLC
Defendants.

HARRIS COUNTY, TEXAS

Original Answer and Counter-Claim of Tax Rescue II, LLC

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Tax Rescue II, LLC and files this its Original Answer and Original Counter-Claim and would show this Court as follows:

1. General Denial

Subject to such stipulations and admissions as may hereinafter be made, Defendant asserts a general denial as is authorized by Rule 92 of the Texas Rules of Civil Procedure, and Defendant respectfully requests that Plaintiff be required to prove the charges and allegations made against Defendant by a preponderance of the evidence as is required by the Constitution and Laws of the State of Texas.

2. Waiver

Plaintiff executed a valid waiver of the notice period which was relied upon by Defendant.

3. Offset/Credit

In the event that Plaintiff succeeds in her claims, Defendant is entitled to a credit/offset.

COUNTER-CLAIM

1. On or about July 13, 2012, Tanya Porter-Pugh entered into a tax loan. Pursuant to this tax loan, Counter-Plaintiff paid delinquent ad valorem taxes on property known as 2616 Campbell St., Houston, Texas 77026 whose legal description is 50 x 98 of Lot Twelve (12), Block Twenty (20), located in Parker Smith Addition, Houston, Texas, Harris County, Texas, CAD#: 033-180-000-0020. Counter-Plaintiff

was transferred the tax liens from the subject taxing entities. The subject taxing entities were legally constituted and authorized to impose and collect ad valorem taxes on the subject property. The subject transferred tax liens were for amounts legally imposed on the subject property. The subject taxes were imposed in the county in which this suit is filed. The taxes were delinquent at the time of payment and transfer of the subject tax lien. The subject tax loan is in default and all things required prior to filing this suit have been done. As a result thereof, Counter-Plaintiff prays for foreclosure of the lien and payment of all amounts due under the subject tax loan, and attorney's fees and expenses.

WHEREFORE PREMESIS CONSIDERED, Tax Rescue II, LLC prays that upon final trial of this matter that Plaintiff be awarded nothing by way of this suit, that Counter-Plaintiff shall be entitled to foreclosure of the transfer tax lien on 2616 Campbell St., Houston, Texas.

Respectfully submitted,

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BY: /s/R. Gary Laws
R. GARY LAWS
State Bar No. 00786045

ATTORNEY FOR TAX RESCUE II, LLC

CERTIFICATE OF SERVICE

The foregoing document was electronically filed on this 20th day of June 2024. Notice of this filing will be sent to all parties via operation of the District Clerk's electronic filing system.

/s/R. Gary Laws

R. GARY LAWS

Unofficial Copy Office of Marilyn Burgess District Clerk

Automated Certificate of eService

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Bridget Brown on behalf of Raymond Laws

Bar No. 00786045

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Envelope ID: 89031444

Filing Code Description: Counter Claim/Cross

Action/Interpleader/Intervention/Third Party

Filing Description: Original Answer and Counter-Claim of Tax Rescue II, LLC

Status as of 6/21/2024 9:05 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mindi Campbell		mcampbell@medearislaw.com	6/20/2024 5:13:59 PM	SENT
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R. GaryLaws		gary@lawsfirm.net	6/20/2024 5:13:59 PM	SENT

Unofficial Copy Office of Notary Public District Clerk