

CAUSE NO. 2019-62492

<b>NANIK BHAGIA &amp; SAHARA GROUP, LP</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff,</i>	§	
	§	
<b>v.</b>	§	<b>HARRIS COUNTY, TEXAS</b>
	§	
<b>PHH MORTGAGE CORP.</b>	§	
<i>Defendant.</i>	§	<b>125<sup>th</sup> JUDICIAL COURT</b>

**MOTION TO WITHDRAW FUNDS FROM THE REGISTRY OF THE COURT**

Nanik Bhagia and Sahara Group, LP., Plaintiffs, file this Motion.

1. When this case was originally filed, Plaintiffs requested and were granted a Temporary Restraining Order.
2. As security for the TRO, the Court ordered a bond in the sum of \$100.00. This amount was paid in cash into the Registry of the Court.
3. The case was subsequently removed to Federal Court.
4. No counterclaim was filed and there is no other claim to the bond.
5. Plaintiff requests that the \$100.00, plus interest, be disbursed from the Registry of the Court and that the check be made payable to Jerry L. Schutza, IOLTA, for the benefit of Nanik Bhagia and Sahara Group, LP., and send it to JERRY L. SCHUTZA, 815 Walker, Suite 1453, Houston, Texas 77002.

WHEREFORE, Nanik Bhagia and Sahara Group, LP., Plaintiffs, request that they be granted and requested relief and any other relief to which they may be entitled.

Respectfully submitted,

JERRY L. SCHUTZA

By: /s/ Jerry L. Schutza

Jerry L. Schutza

SBN: 17853800

815 Walker, Ste. 1453

Houston, Texas 77002

Telephone: (713) 963-9988

Email: schutzalaw@yahoo.com

**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th of May, 2023, a true and correct copy of the foregoing instrument was forwarded by eservice, email, certified mail, return receipt requested, and/or by hand delivery and/or by fax transmission to counsel of record and any Pro Se parties.

**VIA ELECTRONIC SERVICE**

Locke Lord, LLP  
Robert Mowery

By: /s/ Jerry L. Schutza

Jerry L. Schutza

Unofficial Copy Office of Martin Business District Clerk

### 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.

JERRY SCHUTZA on behalf of JERRY SCHUTZA

Bar No. 17853800

schutzalaw@yahoo.com

Envelope ID: 76029368

Filing Code Description: Motion (No Fee)

Filing Description: Motion to Withdraw Funds from the Registry of the Court

Status as of 5/26/2023 9:20 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Vincent JHess		vjhess@lockelord.com	5/25/2023 10:17:56 PM	SENT
Robert T. Mowrey		rmowrey@lockelord.com	5/25/2023 10:17:56 PM	SENT
Virginia Lawrence		VLawrence@lockelord.com	5/25/2023 10:17:56 PM	SENT

Unofficial Copy Office of Marilyn B. Hess District Clerk