

CAUSE NO: 2024-31145

HAMAYUN JAN DURRANI § IN THE DISTRICT COURT
PLAINTIFF §
§
Vs §
§ 152ND JUDICIAL DISTRICT
RAMESH, KAPUR AND §
BLUETEX, LLC §
JOINTLY AND SEVERALLY §
DEFENDANTS § HARRIS COUNTY, TX

DEFENDANT RAMESH KAPUR MOTION TO QUASH
CERTIFICATE OF SERVICE

TO THE HONORABLE JDUDE OF THE SAID COURT

COMES NOW Ramesh Kapur ("Kapur") the named defendant, in his individual capacity and respectfully moves to quash Certificate of Service filed by Plaintiff on September 24, 2024 and declare that no valid service exists that has been effected upon Kapur.

Defendant contends that the Certificate of Service is fraudulent and inaccurate, as no attempt for service has ever been made by the process server or by the district clerk office pursuant to Rule 21a of service of citations.

Defendant Kapur further declares that he has not been contacted by any process server or an agent for the Plaintiff regarding this lawsuit.

Kapur has been made aware today by one of the attorneys friend that a default judgment is being attempted to be secured by one Hamayun Durrani who has joined hands with an attorney Prince , a close associate of Hamayun Durrani, who had represented Kapur before and was fully aware that Kapur does not reside at Ashton Park.

Court is respectfully requesting to declare that no valid service has been effected upon Defendant and quash the certificate of service .

Prince and Durrani produced Certificate of Service in an attempt to mislead this court allegedly stating that " Kapur has been "attempted service" and makcourt believe that he has "attempted served" at his "last Known Address" at 3427 Ashton Park , Houston , TX 77082 whereas both Durrani and Prince due to past interactions know fully that RAMESH KAPUR has not lived at Ashton Park for over 10 years now

Further, “attempted service” pursuant to Rule 21a would not qualify the requirements of Rule 21a when the party has not been served through process of citation.

Kapur has a doctor appointment due to cardiac disorder this morning and filing this emergency motion to apprise conduct of Prince, a licensed attorney ,who is now subject matter under State Bar disciplinary rules by filing a fraudulent document in court record.

WHEREFORE PREMISES CONSIDERED KAPUR respectfully asks this court to quash Certificate of Service pursuant to Rule 204 of Civil Procedure

Respectfully Submitted

/s/Ramesh kapur

kapurhouston@yahoo.com

28-455-7998

Unofficial Copy Office of Marilyn Burgess District Clerk