

FILED

Marilyn Burgess
District Clerk

AUG 20 2024

Time: 7:47
By: C. Hamson
Deputy

FILED
MARILYN BURGESS
DISTRICT CLERK
HARRIS COUNTY, TEXAS
No. 2022-54765
2024 AUG -2 PM 4: 47
CIVIL AFTER HOURS

Placed in Drop Box

8/2/2024

4:44 PM

2022-54765

P-22

EDDIE C. LINDSEY

IN THE DISTRICT COURT OF

Plaintiff

VS.

HARRIS COUNTY, TEXAS

WBL SPO I, LLC and
WORLD BUSINESS LENDERS, LLC

Defendants.

152ND JUDICIAL DISTRICT

**EMERGENCY PETITION FOR RELIEF FROM JUDGEMENT
AND EMERGENCY ORDER TO SHOW CAUSE**

TO HIS HONOR, Judge of the said Court:

Comes Now EDDIE LINDSEY, Plaintiff, Grantor and Counter-Defendant (Hereafter "I", "Mine", "My"), devoid of effective representation, in the said referenced cause under great distress in heart and mind and would humbly plead this Honorable Court to order a show good cause and render a determination with expediency on the following;

1. Can this Honorable Court determine, based on the attached affidavit, Pleadings and Exhibits, Good Cause Exists to open Judgement and/or Reconsider its prior Judgement to Balance the Equity.

2. Can this Honorable Court determine whether James E. Cuellar receiving compensation from WBL for legal representation and acting as Trustee in the Deed of Trust created a conflict of interest and thereby depriving the court of Subject Matter Jurisdiction In WBL Pleadings.
3. Can this Honorable Court determine based on the attached affidavit and Exhibits whether Defendants/Counter Plaintiff's claim(s) were brought in bad faith in an attempt to steal Equity in My Homestead.
4. Can this Honorable Court determine whether its Judgement dated May 21, 2024 "as applied" creates a conflict of law pursuant to the *Takings Clause* and United States Supreme Court Decision under *Devillier v. Texas*;
5. Alternatively, Can this Honorable Court order a stay of the foreclosure sale dated August 6, 2024 until such Question can be Certified before the Supreme Court of Texas.
6. Can this Honorable Court determine based on the attached affidavit and Exhibits Counter Plaintiff will be made whole in a reasonable time thereby rendering the foreclosure sale dated August 6, 2024 unnecessary.
7. Can this Honorable Court determine whether the absolute assignment of rents and leases in May 2020 is considered a *Pro Tanto* payment for the

reduction of the obligation by and through rental interest in the amount of \$163,152.00.

8. Alternatively, I would humbly request this honorable court order a stay of the foreclosure sale dated August 6, 2024 until a Pro Tanto reduction determinations can be made.

Prayer for Relief

I, Eddie C Lindsey, do hereby and herewith repent of my dishonor and offer this Honorable Court my Irrevocable Promise to Pay my debt and would ask this Honorable Court to Give Full Faith and Credit to the United States Supreme Court Decisions under Devillier v. Texas concerning Theft of Equity.

9. Stop the foreclosure sale dated August 6, 2024 of mine and my wife's homestead by any means necessary within this Honorable Court's Granted Power;

10. And such and other relief this Honorable Court my find fit and proper.

Submitted with the Utmost Respect,

Dated: 08/02/2024

Eddie Carl Lindsey


CERTIFICATE OF SERVICE

I, EDDIE CARL LINDSEY, Do Hereby Certify I delivered the same to James E. Cuellar, as representing WBL by and through Email at:

jcuellar@wellscuellar.com

Submitted with the Utmost Respect,

Dated: 08/02/2024


Eddie Carl Lindsey

Unofficial Copy Office of Marilyn Briggs District Clerk



Edit

Save

Share

More

4 bd | 3 ba | 3,705 sqft

2700 Spring Creek Dr, Spring, TX 77373

Off market

Zestimate : **\$507,100** Rent Zestimate : **\$3,399**

Est. refi payment: \$3,337/mo **Refinance your loan**

Home value

Owner tools

Home details

Neighborhood details

Get a cash offer in 3 minutes

\$507,100

Find out how much your home could sell for in as little as 3 minutes with a no-obligation cash offer.

What is this number?

Unlock your offer

Estimated market value

Home value



Zestimate range

\$451,000 - \$568,000



Last 30-day change

- \$7,461 (-1.4%)



Eddie Lindsey <elindsey@airtransportnetwork.us>

Re: IRS letter

1 message

Elindsey <elindsey@businessair.net>
To: EDDIE LINDSEY <elindsey@airtransportnetwork.us>

Fri, Aug 2, 2024 at 11:17 AM

On Aug 1, 2024 at 11:26 AM, <Elindsey> wrote:

Begin forwarded message:

From: James Cuellar <jcuellar@wellscuellar.com>
Date: Aug 1, 2024 at 11:02 AM
To: Elindsey <elindsey@businessair.net>
Subject: RE: IRS letter

I will transmit your offer to WBL and let you know their response.

James

From: Elindsey <elindsey@businessair.net>
Sent: Thursday, August 1, 2024 8:51 AM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: IRS letter

The 200,000 additional would be paid upon receipt of my IRS return.



Eddie Lindsey <elindsey@airtransportnetwork.us>

RE: WBL Good Faith Settlement Offer Documents

1 message

James Cuellar <jcuellar@wellscuellar.com>
To: Elindsey <elindsey@airtransportnetwork.us>

Thu, Aug 1, 2024 at 4:40 PM

Thank you for your email and the attachment. I will forward the same to WBL asap.

James E. Cuellar
Wells & Cuellar, P.C.
440 Louisiana, Suite 718
Houston, Texas 77002
Tel: (713) 222-1281
Fax: (713) 237-0570
email: jcuellar@wellscuellar.com

Please be advised that this e-mail and any files transmitted with it may contain confidential attorney-client communication and may otherwise be privileged or confidential and are intended solely for the individual or entity to whom they are addressed. If you are not the intended recipient, please do not read, copy or retransmit this communication but destroy it immediately. Any unauthorized dissemination, distribution, or copying of this communication is strictly prohibited.

From: Elindsey <elindsey@airtransportnetwork.us>
Sent: Thursday, August 1, 2024 4:33 PM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: Fwd: WBL Good Faith Settlement Offer Documents

Begin forwarded message:

From: Elindsey <elindsey@airtransportnetwork.us>
Date: Aug 1, 2024 at 4:31 PM
To: Resolutions <resolutions@wbl.com>
Subject: Fwd: WBL Good Faith Settlement Offer Documents

Please respond ASAP.

Thank You

Eddie Lindsey

Unofficial Copy Office of Marilyn Burgess District Clerk



Eddie Lindsey <elindsey@airtransportnetwork.us>

Fwd: WBL

1 message

Elindsey <elindsey@businessair.net>
To: EDDIE LINDSEY <elindsey@airtransportnetwork.us>

Fri, Aug 2, 2024 at 6:52 AM

Begin forwarded message:

From: James Cuellar <jcuellar@wellscuellar.com>
Date: Aug 1, 2024 at 8:32 AM
To: Elindsey <elindsey@businessair.net>
Subject: RE: WBL

Huh? You're not offering the full amount. Your offer of \$200,000 is less than the judgment.

James

From: Elindsey <elindsey@businessair.net>
Sent: Thursday, August 1, 2024 8:27 AM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: Re: WBL

Outside of the 175,000 I already paid WBL credited me 11,000 towards the note principal. I need to know if they will accept my offer before it is too late to stop the sale on Tuesday.. Why is the overall value a concern if I am offering the full amount.

On Aug 1, 2024 at 8:19 AM, <James Cuellar> wrote:

Yes, please send me the letter with September 13 in it.

Nobody expects you to pay more than what you owe. My point is that your offer is less than that.

I don't have the authority to accept any offer – my client makes the decision. I just wanted to discuss your offer with you before I present it to them.

James

From: Elindsey <elindsey@businessair.net>
Sent: Wednesday, July 31, 2024 8:26 PM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: Re: WBL

First WBL will not get any funds over what I owe by your lawsuit. Second That is in the letter preceding the tax report. I will send that to you shortly.

I guess you are not accepting my offer and plan on foreclosing.

On Jul 31, 2024 at 4:58 PM, <James Cuellar> wrote:

I don't see September 13 in the letter you sent me.

\$200,000?

You owe more than that, and the house is worth more than that too. So, why in the world should WBL settle for less?

James

From: Elindsey <elindsey@businessair.net>
Sent: Wednesday, July 31, 2024 4:43 PM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: Re: WBL

As soon as the IRS releases the funds.

They say by Sept 13. It is enclosed in the letter. However the way the IRS is backed up I request 90 days. I would like to pay 200,000

On Jul 31, 2024 at 4:05 PM, <James Cuellar> wrote:

Two more questions:

First, when do you expect to receive the money?

Second, what are you offering to pay WBL?

James

From: Elindsey <elindsey@businessair.net>
Sent: Wednesday, July 31, 2024 1:49 PM
To: James Cuellar <jcuellar@wellsquellar.com>
Subject: Re: WBL

A friend just trying to help me figure out how to prevent me from losing my home.

And yes Due to all of my losses and expenses And the funds for the sale of my other home.

On Jul 31, 2024 at 1:45 PM, <James Cuellar> wrote:

Eddie,

Two questions.

First, who was "Clay" who joined us on the call? Last name?

Second, are you telling me that the IRS owes you \$1,152,372.00?

James E. Cuellar

Wells & Cuellar, P.C.

440 Louisiana, Suite 718

Houston, Texas 77002

Tel: (713) 222-1281

Fax: (713) 237-0570

email: jcuellar@wellscuellar.com

Please be advised that this e-mail and any files transmitted with it may contain confidential attorney-client communication and may otherwise be privileged or confidential and are intended solely for the individual or entity to whom they are addressed. If you are not the intended recipient, please do not read, copy or retransmit this communication but destroy it immediately. Any unauthorized dissemination, distribution, or copying of this communication is strictly prohibited.

From: Elindsey <elindsey@businessair.net>
Sent: Wednesday, July 31, 2024 1:40 PM
To: James Cuellar <jcuellar@wellscuellar.com>
Subject: WBL



IRONSCALE finds this email suspicious! We know Elindsey by name, but the email was sent from an unfamiliar address elindsey@businessair.net

James;

I don't have my letter here at the office.

I will have to go home for my letter.

I have to go home to scan and send.

Unofficial Copy Office of Marilyn Burgess District Clerk

Internal Revenue Service
 United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 07-31-2024
 Response Date: 07-31-2024
 Tracking Number: 106340254569

Account Transcript

FORM NUMBER: 1040 TAX PERIOD: Dec. 31, 2023

TAXPAYER IDENTIFICATION NUMBER: XXX-XX-8236
 SPOUSE TAXPAYER IDENTIFICATION NUMBER: XXX-XX-6740

EDDI C & THOM C LIND
 2700 S

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: -1,152,372.00
 ACCRUED INTEREST: 0.00 AS OF: Jul. 29, 2024
 ACCRUED PENALTY: 0.00 AS OF: Jul. 29, 2024

ACCOUNT BALANCE
 PLUS ACCRUALS
 (this is not a
 payoff amount): -1,152,372.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 02
 FILING STATUS: Married Filing Joint
 ADJUSTED GROSS
 INCOME: 292,704.00
 TAXABLE INCOME: 263,504.00
 TAX PER RETURN: 48,070.00
 SE TAXABLE INCOME
 TAXPAYER: 0.00
 SE TAXABLE INCOME
 SPOUSE: 0.00
 TOTAL SELF
 EMPLOYMENT TAX: 0.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Apr. 15, 2024
 PROCESSING DATE Jul. 15, 2024

TRANSACTIONS				
CODE	EXPLANATION OF TRANSACTION	CYCLE	DATE	AMOUNT
150	Tax return filed 76205-508-05808-4	20242605	07-15-2024	\$48,070.00
806	W-2 or 1099 withholding		04-15-2024	-\$1,200,442.00
971	Notice issued		07-15-2024	\$0.00

This Product Contains Sensitive Taxpayer Data

EDDIE C LINDSEY
%2700 Spring Creek Dr
Spring, TX 77373

Serial 07312024-1

Date: 08/01/2024

CREDIT TO: BOFD as PVA for WBL SPO, LLC

Pay to: World Business Lenders SPO, LLC

Two Thousand Dollars and 00/100*****

\$2,000.00

USAA Federal Savings Bank

9800 Fredricksburg Rd

San Antonio, TX 78288

Dollars

Eddie C. Lindsey
Authorized Account Signature

Memo: Good Faith Deposit for accepted offer only

Due to the assurance of uniform value this is an exchange acknowledgment; This Check is an Irrevocable Par Value Assignment tendered in good faith to credit the said pursuant to memorialized intent



⑆314074269⑆ 0178253472⑈ 12364

GOOD-FAITH SETTLEMENT OFFER

THE EMAILED COPY OF THESE INSTRUMENTS CAN BE USED AS ORIGINAL

Resolutions@wbl.com
Camela 212-271-8275

Re: LEGACY AIRWAYS, LLC Loan, Judgement & Foreclosure
of Trust deed in 2700 Spring Creek Dr.

To Whom it may Concern,

In order to protect my wife's and mine own entitlement in the Equity in my Homestead at 2700 Spring Creek Drive I do hereby and herewith tender this my firm settlement offer.

WHEREAS, There is a surplus of value over the referenced judgement debt and therefore I hereby present this Good-Faith settlement offer in order to avoid loss of the equitable rights as mentioned before;

WHEREAS, evidence of the ability to pay the amount of the judgment in full in the near future has been presented to Mr. Cuellar on 07/31/2024.

Whereas, said evidence provides more than enough credit to cover said Judgement within 90 days;

Whereas, please find the attached tender for \$2,000.00 as a Good-Faith Deposit to be negotiated only if WBL SPO, LLC accepts this offer and the sum certain time constraints;

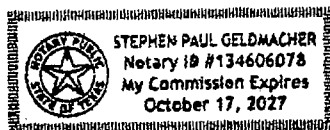
IRREVOCABLE PROMISE TO PAY

THEREFORE, I, Eddie Carl Lindsey, in valuable consideration of said Judgement do hereby irrevocably Promise to Pay to WORLD BUSINESS LENDERS SPO, LLC \$220,000.00 (Two Hundred Twenty Thousand) plus interest within Five (5) business days after my Tax return is Deposited into my account.

Date: 08/01/2024

In witness of:

Stephen Paul Geldmacher
8/1/2024



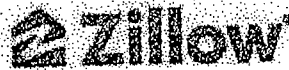
Eddie C. Lindsey
Authorized Account Signature

Instant Cash Offer



Sign In

Local partner agent



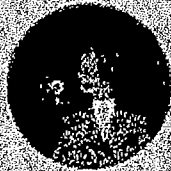
\$562,804

Updates Aug 09, 2024

Maximize sales price



View your comps



Have any questions?

Speak to a licensed Zillow Advisor.



How it works



Sign in with Google



Use your Google Account to
sign in to Zillow

No more passwords to remember.
Signing in is fast, simple and secure.



Continue



PLEASE FILE UNDER SEAL



Department of the Treasury
Internal Revenue Service
Mail Stop C1 8525
Kansas City MO 64999-0005

Notice name 0910 Tax year 2023
Notice date Jul 15, 2024

Last date to respond September 15, 2024
Visit www.irs.gov/efile to learn more about this notice.

EDDIE C & THOMASNA C LOOSEY

184
5870

Summary

Payments and credits	137,700.00
Tax you owe	145,070.80
Interest we owe you	-21,153.07
Amount applied to your 2024 estimated tax	37.00
Refund due	51,163.50

*Your refund will be issue if we owe you interest.

Note: The above summary may not reflect transactions with the last 21 days.

Why we changed your information

We did not follow the return design to enter payments to your account because the form was not correct for your account.

How to resolve this issue

Review this notice and compare our changes to the original information you filed.

If you don't comment by September 23, 2024, we'll proceed as if you agree with the information on this notice.

If you agree with the changes we made:

If you don't agree with the changes we made:

Visit www.irs.gov/efile to learn more about this notice. You can also call 1-800-829-1040 for more information. If you have questions, visit www.irs.gov/efile to learn more about this notice. You can also call 1-800-829-1040 for more information. If you have questions, visit www.irs.gov/efile to learn more about this notice.

PLEASE FILE UNDER SEAL



This Product Contains Sensitive Taxpayer Data

Request Date: 07-31-2024
Response Date: 07-31-2024
Tracking Number: [REDACTED]

Account Transcript

FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2023

TAXPAYER IDENTIFICATION NUMBER: [REDACTED]
SPOUSE TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

EDDI C & THOM C LIND
[REDACTED]

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: -1,152,372.00
ACCRUED INTEREST: 0.00 AS OF: Jul. 29, 2024
ACCRUED PENALTY: 0.00 AS OF: Jul. 29, 2024

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): -1,152,372.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 02
FILING STATUS: Married Filing Joint
ADJUSTED GROSS INCOME: [REDACTED]
TAKABLE INCOME: [REDACTED]
TAX PER RETURN: [REDACTED]
SE TAXABLE INCOME TAXPAYER: 0.00
SE TAXABLE INCOME SPOUSE: 0.00
TOTAL SELF EMPLOYMENT TAX: 0.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER): Apr. 15, 2024
PROCESSING DATE: Jul. 15, 2024

TRANSACTIONS			
CODE	EXPLANATION OF TRANSACTION	CYCLE DATE	AMOUNT
150	Tax return filed 76205-508-05808-4	20242605 07-15-2024	\$48,070.00
806	W-2 or 1099 withholding	04-15-2024	-\$1,200,442.00
971	Notice issued	07-15-2024	\$0.00

This Product Contains Sensitive Taxpayer Data

EDDIE C LINDSEY

Serial [REDACTED]

Date: 08/01/2024

CREDIT TO: BOFD as PVA for WBL SPO, LLC

Pay to: World Business Lenders SPO, LLC

Two Thousand Dollars and 00/100

\$2,000.00

USAA Federal Savings Bank

9800 Fredricksburg Rd

San Antonio, TX 78288

Dollars

Eddie C. Lindsey
Authorized Account Signature

Memo: Good Faith Deposit for accepted offer only

Due to the assurance of uniform value this is an exchange acknowledgment; This Certificate of Revocable Par Value Assignment tenders in good faith to credit the said pursuant to memorialized intent

GOOD-FAITH SETTLEMENT OFFER

THE EMAILED COPY OF THESE INSTRUMENTS CAN BE USED AS ORIGINAL

Resolutions@wbl.com
Camela 212-271-8275

Re: LEGACY AIRWAYS, LLC Loan, Judgement & Foreclosure
of Trust deed in 2700 Spring Creek Dr.

To Whom it may Concern,

In order to protect my wife's and mine own entitlement in the Equity in my Homestead at 2700 Spring Creek Drive I do hereby and herewith tender this my firm settlement offer.

WHEREAS, There is a surplus of value over the referenced judgement debt and therefore I hereby present this Good-Faith settlement offer in order to avoid loss of the equitable rights as mentioned before;

WHEREAS, evidence of the ability to pay the amount of the judgment in full in the near future has been presented to Mr. Cuellar on 07/31/2024.

Whereas, said evidence provides more than enough credit to cover said Judgement within 90 days;

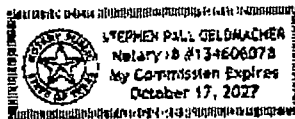
Whereas, please find the attached tender for \$2,000.00 as a Good-Faith Deposit to be negotiated only if WBL SPO, LLC accepts this offer and the sum certain time constraints;

IRREVOCABLE PROMISE TO PAY

THEREFORE, I, Eddie Carl Lindsey, in valuable consideration of said Judgement do hereby irrevocably Promise to Pay to WORLD BUSINESS LENDERS SPO, LLC [220,000.00] (Two Hundred Twenty Thousand) plus interest within Five (5) business days after my Tax return is Deposited into my account.

In witness of:

Stephen Paul Geldmacher
8/1/2024



Date: 08/01/2024

Eddie C. Lindsey
Authorized Account Signature

THE EMAILED COPY OF THESE INSTRUMENTS CAN BE USED AS ORIGINAL

PLEASE FILE UNDER SEAL



Department of the Treasury
Internal Revenue Service
Mail Stop 015225
Kansas City, MO 64699-0025

Notice name: 0010 Tax year: 2023
Notice date: July 15, 2024

Last date to respond: September 12, 2024
Visit www.irs.gov/notice to learn more about the notice.

EDDIE G & THOMASINA C LINDSEY

18-1
5220

Summary

Payments you made	\$1,200,000.00
Tax you owed	\$45,000.00
Interest we charged*	\$11,150.00
Amount applied to your 2024 estimated tax	\$1,000
Refund due	\$1,144,950.00

*Your refund will be more if we pay you interest.

Note: This table summary may not reflect transactions with the IRS directly.

Why we changed your information

We didn't know the amount claimed as other payments (or you didn't claim it) was included in your 2023 tax return.

How to resolve this issue

Review this notice and compare the changes to the information you provided.

If you don't disagree by September 12, 2024, we'll proceed as if you agree with the information in this notice.

If you agree with the changes we made:

- You'll receive a refund of the amount we owe you.

If you disagree with the changes we made:

- You'll need to file a return for 2023. If you don't, we'll use the information we have to determine your tax liability for 2023. You'll need to pay any tax you owe and may be subject to penalties and interest. You'll also need to file a return for 2024 and form 1041 if you have any other income.

PLEASE FILE UNDER SEAL



This Product Contains Sensitive Taxpayer Data

Request Date: 07-31-2024
Response Date: 07-31-2024
Tracking Number: [REDACTED]

Account Transcript

FORM NUMBER: 1040 TAX PERIOD: Dec. 31, 2023

TAXPAYER IDENTIFICATION NUMBER: [REDACTED]
SPOUSE TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

EDDI C & THOM C LIND
[REDACTED]

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: -1,152,372.00
ACCRUED INTEREST: 0.00 AS OF: Jul. 29, 2024
ACCRUED PENALTY: 0.00 AS OF: Jul. 29, 2024

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): -1,152,372.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 02
FILING STATUS: Married Filing Joint
ADJUSTED GROSS INCOME: [REDACTED]
TAXABLE INCOME: [REDACTED]
TAX PER RETURN: [REDACTED]
SE TAXABLE INCOME TAXPAYER: 0.00
SE TAXABLE INCOME SPOUSE: 0.00
TOTAL SELF EMPLOYMENT TAX: 0.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Apr. 15, 2024
PROCESSING DATE Jul. 15, 2024

TRANSACTIONS				
CODE	EXPLANATION OF TRANSACTION	CYCLE	DATE	AMOUNT
150	Tax return filed 76205-508-05808-4	20242605	07-15-2024	\$48,070.00
806	W-2 or 1099 withholding		04-15-2024	-\$1,200,442.00
971	Notice issued		07-15-2024	\$0.00

This Product Contains Sensitive Taxpayer Data

No. 202254765

EDDIE C. LINDSEY, §
Plantiff, §
VS. §
WBL SPO I, LLC and §
WORLD BUSINESS LENDERS, LLC, §
Defendants. §

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

FILED
Marilyn Burgess
District Clerk

AUG 21 2024

Time: _____
Harris County, Texas

By: _____
Deputy

152ND JUDICIAL DISTRICT

AFFIDAVIT IN SUPPORT OF PETITION FOR RELIEF

TO: Plaintiff EDDIE C. LINDSEY by serving his counsel of record, Robert C. Vilt, Vilt Law,
P.C. 5177 Richmond Ave., Suite 1142, Houston, TX 77056.

I received notice in the mail of Substitute Trustee's sale of my home, scheduled for August
6, 2024. I was never contacted by my attorney for this notice.

I reached out to my attorney on July 26, 2024, and the attorney never responded. I received
the notice in the mail by regular mail. I was not served or received certified mail.

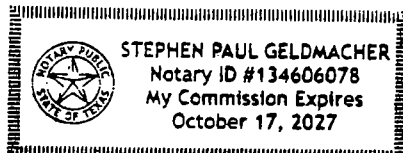
I contacted WBL to make an offer to pay the full amount. The bank was not willing to settle
without turning my home over to them under a rental agreement.

I attest that I did not receive notice until July 24, 2024.

Eddie C. Lindsey

Eddie C. Lindsey

IN WITNESS THEREOF



Stephen Paul Geldmacher

No. 2022-54765

EDDIE C. LINDSEY

IN THE DISTRICT COURT OF

Plaintiff

FILED

Marilyn Burgess
District Clerk

AUG 21 2024

HARRIS COUNTY, TEXAS

VS.

Time: _____
Harris County, Texas

By _____
Deputy

WBL SPO I, LLC and
WORLD BUSINESS LENDERS, LLC

Defendants.

152ND JUDICIAL DISTRICT

SHOW CAUSE ORDER

Upon reading the affidavit of EDDIE CARL LINDSEY dated the 2nd day of August, 2024, together with all of the papers, pleadings and proceedings heretofore and herein.

Let the Plaintiff or their attorneys show cause before The Honorable Judge of said Court located at 201 Caroline St., Houston, Texas on the 5th day of August, 2024, or as soon thereafter as the parties can be heard, why an order should not be made and entered herein staying the foreclosure sale dated August 6, 2024 as sufficient reason appearing therefore, it is further:

Ordered that the Counter-Plaintiff, their agents, their attorney, servants, or others acting on their behalf are hereby restrained and prohibited from holding a foreclosure sale on August 6, 2024.

Ordered that the Counter-Plaintiff, their agents, their attorney, servants, or others acting on their behalf hereby postpone the foreclosure sale scheduled for on August 6, 2024 for a minimum of _____ days.

Dated: _____

Presiding Judge of Said Court