

**LIS PENDENS**

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**Date:** August 28, 2024

**Party Filing Lis Pendens:** Capital Fund I, LLC

**Party's Attorney's Address:** Kent Hanszen  
14201 Memorial Drive  
Houston, Texas 77079

**Other Parties to Proceeding:** HSBC Bank USA,  
National Association, as Trustee for ACE Securities Corp. Home  
Equity Loan Trust, Series 2003-OP1,  
Power Default Services, Inc.,  
PHH Mortgage Corporation, and  
AVT Title Services, LLC.

**Other Party's Address:** The following individuals serve as Counsel for the Other Parties to  
the Proceeding:

Robert T. Mowrey and Matthew K. Hansen, Locke Lord LLP, 2200  
Ross Avenue, Suite 2800, Dallas, Texas 75201, and  
Helen O. Turner, Locke Lord LLP, 600 Travis St., Suite 2800,  
Houston, Texas 77002.

Nicholas M. Frame and Crystal G. Gibson, Mackie Wolf Zientz &  
Mann, LLP, 14160 North Dallas Parkway, Suite 900, Dallas, Texas  
75254.

**Proceeding:** Court: United States District Court for the Southern District of Texas Houston  
Division

Cause Number: 4:24-cv-02800

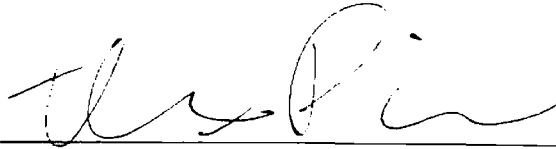
Style of Case: *Capital Fund I, LLC v. HSBC Bank USA, National Association, as  
Trustee for Ace Securities Corp. Home Equity Loan Trust, Series  
2003-OP1, Power Default Services, Inc., PHH Mortgage  
Corporation, and AVT Title Services, LLC.*

Type of Proceeding: Suit to Quiet Title.

**Property:** The property which is the subject of this title dispute has the mailing address of  
3611 Lancaster Walk Drive, Houston, Texas 77066, and is more particularly  
described as:

Lot Three (3), in Block Six (6), of NORTHCLIFFE MANOR, SECTION ONE (1), a subdivision in Harris County, Texas, according to the map or plat thereof, recorded in Volume 288, Page 288, Page 119 of the Map Records of Harris County, Texas.

Notice is hereby given that the Proceeding is pending and that the Party filing Lis Pendens is affirmatively seeking title to, the establishment of an interest in, or enforcement of an encumbrance against the Property.



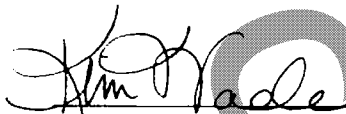
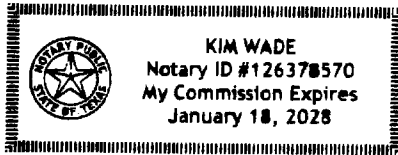
Kent M. Hanszen  
State Bar No. 00784210  
Alexandra E. Pierce  
State Bar No. 24131912  
14201 Memorial Dr.  
Houston, Texas 77079  
(713) 522-9444  
*Attorneys for Capital Fund I, LLC*

ACKNOWLEDGMENT

STATE OF TEXAS           §  
                                          §  
COUNTY OF HARRIS     §

BEFORE ME, the undersigned Notary Public, on this day personally appeared Alexandra E. Pierce, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that the same has been executed for the purposes and consideration therein expressed.

GIVEN under my hand and seal of office this 29<sup>th</sup> day of August, 2024.

  
\_\_\_\_\_  
Notary Public, in and for  
State of Texas

RP-2024-317450

COPY

UNOFFICIAL COPY

RP-2024-317450

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e-Filed & e-Recorded in the  
Official Public Records of

HARRIS COUNTY

TENESHIA HUDSPETH

COUNTY CLERK

Fees \$29.00

RECORDERS MEMORANDUM

This instrument was received and recorded electronically and any blackouts, additions or changes were present at the time the instrument was filed and recorded.

Any provision herein which restricts the sale, rental, or use of the described real property because of color or race is invalid and unenforceable under federal law.

THE STATE OF TEXAS  
COUNTY OF HARRIS

I hereby certify that this instrument was FILED in File Number Sequence on the date and at the time stamped hereon by me; and was duly RECORDED in the Official Public Records of Real Property of Harris County, Texas.



*Tenesha Hudspeth*  
COUNTY CLERK  
HARRIS COUNTY, TEXAS

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