

LAW OFFICES

TOTZ ELLISON & TOTZ, P. C.

2211 NORFOLK, SUITE 510

HOUSTON, TX 77098

Telephone: (713)275-0303

Facsimile: 713-275-0304

April 10, 2025

Teneshia Hudspeth
Harris County Civil Court #4
201 Caroline
Houston, Tx 77002

Re: **Cause No. 1241509** - *Build.Com vs. Wiseman Homes Llc, Aka And DbA Wiseman Homes; And Robert Wiseman Jr., Aka And Bspa Robert Wiseman, Robert Lee Wiseman Jr., Robert Lee Wiseman, Robert L. Wiseman Jr., Robert L. Wiseman, R. L. Wiseman Jr., And Robert L. Wiseman Sr..* In the County Civil Court at Law No. Four (4) of Harris County, Texas.

TET File No. 109995

Dear Clerk:

Please file the following:

1. Plaintiff's Certificate of Written Discovery.

A copy of same has been forwarded to the party/parties listed below along with the original:

2. Plaintiff's First Request for Admission of Facts.
3. Plaintiff's First Interrogatories.
4. Plaintiff's First Request for Discovery and Production of Documents.

via the means stated below and/or via electronic means, if possible. Thank you for your assistance in this matter.

Very truly yours,



JON D. TOTZ

JDT/dl
Enclosures

cc: **Regular Mail**
Wiseman Homes LLC
12333 Sowden Road, Suite B
Houston, TX 77080

cc: **Regular Mail**
Robert Wiseman Jr.
12333 Sowden Road, Suite B
Houston, TX 77080

Cause No. 1241509

BUILD.COM

IN THE COUNTY COURT

vs.

AT LAW NO. FOUR (4)

WISEMAN HOMES LLC, AKA AND DBA
WISEMAN HOMES; AND ROBERT
WISEMAN JR., AKA AND BSPA ROBERT
WISEMAN, ROBERT LEE WISEMAN JR.,
ROBERT LEE WISEMAN, ROBERT L.
WISEMAN JR., ROBERT L. WISEMAN, R.
L. WISEMAN JR., AND ROBERT L.
WISEMAN SR.

HARRIS COUNTY, TEXAS

PLAINTIFF'S CERTIFICATE OF WRITTEN DISCOVERY

I hereby certify that Plaintiff's Post-Judgment Request for Request for Production of Documents, Interrogatories and Admissions have been served upon the party/parties listed below, in compliance with Rule 3.7 of the Rules of Civil Trial Division of the Harris County Courts on 15 day of April 2025, as addressed below.

Respectfully submitted,

TOTZ ELLISON & TOTZ, P.C.

By:

JON D. TOTZ

TBA # 20148000

2211 Norfolk, Suite 510

Houston, Texas 77098

Phone: 713-275-0303

Fax: 713-275-0304

Email: jtotz@tetlegal.com

E-Service: service@tetlegal.com

ATTORNEYS FOR PLAINTIFF

cc:

Regular Mail

Wiseman Homes LLC

12333 Sowden Road, Suite B

Houston, TX 77080

cc:

Regular Mail

Robert Wiseman Jr.

12333 Sowden Road, Suite B

Houston, TX 77080

Cause No. 1241509

BUILD.COM

vs.

WISEMAN HOMES LLC, AKA AND DBA
WISEMAN HOMES; AND ROBERT
WISEMAN JR., AKA AND BSPA ROBERT
WISEMAN, ROBERT LEE WISEMAN JR.,
ROBERT LEE WISEMAN, ROBERT L.
WISEMAN JR., ROBERT L. WISEMAN, R.
L. WISEMAN JR., AND ROBERT L.
WISEMAN SR.

§
§
§
§
§
§
§
§
§
§
§

IN THE COUNTY COURT

AT LAW NO. FOUR (4)

HARRIS COUNTY, TEXAS

**POST-JUDGMENT REQUEST FOR PRODUCTION OF DOCUMENTS,
INTERROGATORIES AND REQUEST FOR ADMISSIONS**

TO: WISEMAN HOMES LLC, AKA AND DBA WISEMAN HOMES, Defendant, pro se,
12333 Sowden Road, Suite B, Houston, TX 77080.

Pursuant to Rules 192, 193, 196, 197, 198 and 215 of the TEX. R. CIV. P., you are hereby required to answer fully and factually each of the interrogatories hereinafter set out, when applicable. You are further required to make written response to each of said matters, sign same, swear to it, and deliver it to the attorney of record for the Plaintiff herein within thirty (30) days after receipt of same. You are further required to supplement your answers to this discovery pursuant to TEX. R. CIV. P.

Pursuant to Rules 196 and 215 of the TEX. R. CIV. P., Plaintiff, BUILD.COM hereby propounds its First Set of Requests for Production to WISEMAN HOMES LLC, AKA AND DBA WISEMAN HOMES, Defendant.

The requested documents are to be produced for inspection, examination and copying within thirty (30) days of Plaintiff's receipt hereof, at the offices of TOTZ ELLISON & TOTZ, P. C., 2211 NORFOLK, SUITE 510, HOUSTON, TX 77098.

You are further required to supplement your responses to the Request for Production of Documents pursuant to TEX. R. CIV. P. 193.5

Respectfully submitted,

TOTZ ELLISON & TOTZ, P.C.

By: _____

JON D. TOTZ
TBA # 20148000
2211 Norfolk, Suite 510
Houston, Texas 77098
Phone: 713-275-0303
Fax: 713-275-0304
Email: jtotz@tetlegal.com
E-Service: service@tetlegal.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

Signature above is also certification that a true and correct copy of the foregoing document was forwarded on the 16 day of April, 2025 to the party/parties listed below via electronic service, if possible, and/or by the means stated below.

Regular Mail

Wiseman Homes LLC
12333 Sowden Road, Suite B
Houston, TX 77080



JON D. TOTZ

INSTRUCTIONS AND DEFINITIONS:

1. *Plaintiff* refers to and is intended to include BUILD.COM as well as all other persons and/or entities acting or purporting to act on behalf of Plaintiff, including any attorney or other representative, whether or not authorized to so act.
2. *Defendant* or *Defendants* refers to, and is intended to include, WISEMAN HOMES LLC, AKA AND DBA WISEMAN HOMES, as well as all other persons and/or entities acting or purporting to act on behalf of Defendant, including any attorney or other representative, whether or not authorized to so act.
3. *You* and *yours* refers to WISEMAN HOMES LLC, AKA AND DBA WISEMAN HOMES.
4. *Persons(s)* shall include and is intended to include all individuals and entities, including, without limitation, all natural persons, sole proprietorships, organizations, associations, companies, holding companies, partnerships, joint ventures, limited partnerships, corporations, and/or any other individuals or entities having knowledge of relevant facts relating to matters at issue in this suit.
5. *Documents* refers to (a) all handwritten, typed, or printed matter of any kind, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including, without limitation, agreements, correspondence, memoranda, notes, jottings, press releases, diaries, examinations, statistics, letters, telegrams, minutes, time records, by-laws, dividend checks, audits, financial records in any form, reports, studies, training manuals, canceled checks, summaries, pamphlets, books, inter-office and intra-office communications, notations of any sort of conversations, telephone calls, meetings, or other communications, bulletins, printed matter, computer printouts, computer-generated or computer-stored data in whatever form, teletypes, agendas, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing; (b) graphs or aural records or representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape and sound recordings, and motion pictures; and (c) electronic, mechanical, or electronic records or representations of any kind, including, without limitation, tapes, cassettes, discs, recordings, and all transcriptions, in whole or in part, of any of the foregoing.
6. The conjunctions *and* and *or* shall each be individually interpreted in every instance as meaning *and/or* and shall not be interpreted disjunctively to exclude any information otherwise within the scope of any specification.
7. The singular form of a word includes the plural form of that word and the plural form of a word includes the singular form.
8. *All documents* refers to every document, whether an original or copy, known to any person or business organization to which this request is addressed, or to any file supervisor or record keeper for each such individual or organization, and every document which can be located or discovered by such persons through reasonably diligent efforts.

9. *Relating or relating to* refers to any act, work, meeting, oral or written communication, or document referring directly or indirectly in any way to the described facts, or evidencing, directly or indirectly, such facts.
10. *Identify or identification*, when used with regard to a natural person or persons, means to state: (a) the full name of each person; (b) each person's present or last known business and home address; (c) the name of the person's present or last known employer; and (d) if such person was affiliated at any time with any party to this litigation or with any affiliate of any party to this litigation by employment or otherwise, state the nature (including job title, if any) and dates of such affiliation. If any of the above information is not available, state any other means of identifying each such individual person.
11. *Identify or identification*, when used in reference to any entity other than a natural person, includes all parents, subsidiaries, divisions, present or former affiliates, merged or acquired properties, businesses or associations, which identification shall include the full name and location or present or last known address of the principal place of business of said entity to be identified. If any of the above information is not available, state any other means of identifying each such entity.
12. *Identify or identification*, when used in reference to a document, means to: (a) specify the nature of the document (e.g., letter, memorandum, telegram, invoice, or some other means of identifying same); (b) identify the date, if any, appearing on the document, or, if it is undated, the date on which the document was prepared; (c) describe in general the subject matter of the document; (d) identify the individual and/or entity to whom it pertains; (e) identify the persons who authored, originated, wrote, signed, dictated, or otherwise participated in the preparation of the document; (f) identify each person, if any, who received an original or copy of the document; and (g) identify the present or last known location and custodian of each such document. If any such document is no longer in the possession or subject to the control of the person(s) or entity(ies) to whom this document is addressed, state: (i) the disposition made of the document, including the identity of the person who received the document; (ii) the reasons for the disposition; and (iii) the date thereof. If any of the above information is not available, state any other means of identifying all such documents.
13. *Identify or identification*, when used in reference to an act, event, or occurrence, means to state its date, to identify the persons or entities that were parties to and witnesses of the act, event, occurrence, to describe where and how it took place, and to identify any document which constitutes or refers to such act, event or occurrence.

INTERROGATORIES

Unless stated otherwise, the time period for all questions is from January 1, 2019, until and including the present.

REQUEST 1:

State the full correct name of the Defendant, each trade name or the subsidiary's name, the date of formation of the business, the business's present complete address, and the telephone number of each office of the Defendant.

RESPONSE:

REQUEST 2:

State the full address of each institution or business organization with whom the Defendant has engaged in any business enterprise or venture in the past two years.

RESPONSE:

REQUEST 3:

State the date, place, and name of each person, institution, or business organization to whom the corporation has furnished or exhibited any statement of its financial condition during the past two years.

RESPONSE:

REQUEST 4:

State the full description and present locations and ownership of each asset or property shown on any financial statement listed in the proceeding question. If any such asset or property is not presently owned by the Defendant, state the full details concerning its disposition by the Defendant, including to whom it was transferred, when, and for what consideration.

RESPONSE:

REQUEST 5:

If the Defendant filed or prepared income tax returns during the past two (2) years, state the source and amount of each item of income listed thereon, and if the Defendant had any source of income not shown on such tax returns, state the full details.

RESPONSE:

REQUEST 6:

Describe in full all property both real and personal which the Defendant owns or has an interest in and give the present value of the Defendant's interest in the property.

RESPONSE:

REQUEST 7:

If any of the real or personal property owned by the Defendant, either individually, jointly, or otherwise, is encumbered by a real estate mortgage, chattel mortgage, or any other type of lien, or has been pledged to secure a debt, give a full description of all relevant data concerning such lien, mortgage or pledge, including, but not limited to, a description of the property encumbered or pledged, the nature of each encumbrance the amount of the debt, the name and address of the pledgee or the person who holds the encumbrance, and the name and address of each person who paid the consideration for the encumbrance.

RESPONSE:

REQUEST 8:

If the Defendant has an ownership interest in any business, describe each business in full, giving the address, type of business, the value of the corporation's interest, and the name of each officer, director, or partner of the business, and if any articles of incorporation, partnership or certificate of doing business under a fictitious name were filed with any government agency by any of the enterprises mentioned, state the nature of the document filed, the location of the office where filed, and the date of filing.

RESPONSE:

REQUEST 9:

If the Defendant owns any stocks, bonds, or other securities of any class of government, governmental organization, company, firm, or corporation whether foreign or domestic, describe in full each security or other evidence of ownership, the date on which each was acquired, how each was acquired and from whom, and the present location and custody of each bond or other certificate. Also indicate whether any of the above securities are pledged, mortgaged or subject to an option to repurchase by anyone, and if so, state the name and address of each person, firm, or business holding such interest and give a description of the interest.

RESPONSE:

REQUEST 10:

Describe in full all of the Defendant's bank accounts, including checking, savings accounts in trust for another, or other accounts, and any safe deposit box or other depository. State the amount or contents of each the number of each account, the name and address of the bank, and the source of the deposits. Also describe each incident where the contents of the abovementioned depositories have been removed during the past forty-eight (48) months.

RESPONSE:**REQUEST 11:**

Describe any interest of any kind in any patent, trademark or copyright which the Defendant owns, stating the registry number of each and the name of each person, firm, or business or individual who shares some interest in the patent or copyright and the amount or percentage of each interest.

RESPONSE:**REQUEST 12:**

If the Defendant has, at any time in the past two (2) years, paid the premiums on any life insurance policy, state the name and address of the company that issued it, the number of the policy, the face value of the policy on the death of the insured, the present cash value of the policy, the date the policy was issued, the total consideration paid to the company that issued it, the name insured under each policy, the date on which the payment was made, the name and address of each person who has custody of a copy of the document or contract, the name of the owner of the policy, and whether the name of the beneficiary of any of these insurance policies has been changed in the past twelve (12) months.

RESPONSE:**REQUEST 13:**

Describe in full any causes of action or claims for money against others on notes or otherwise of any nature which you have or have assigned in the past two (2) years.

RESPONSE:**REQUEST 14:**

Describe each incident wherein, at any time in the past two (2) years, the Defendant has given consideration for any property which has been conveyed or transferred and is now being held for the Defendant in the name of some person, institution, or business organization other than the Defendant and/or if anyone has held anything for the Defendant or for its benefit.

RESPONSE:

REQUEST 15:

Describe any property held by the Defendant as trustee of a testamentary or intervivos trust, stating the name and address of the trustor and each beneficiary of the trust as well as any trust the corporation has created or contributed to for the benefit of others during the past two (2) years.

RESPONSE:

REQUEST 16:

State the name and contact information for each individual that prepared a tax return for the Defendant over the past 72 months.

RESPONSE:

REQUEST 17:

List all accounts receivable in the Defendant's business records by name, address, and amount due, and state whether, within the past twelve (12) months, any of the accounts receivable have been assigned or otherwise disposed of other than by collection.

RESPONSE:

REQUEST 18:

Describe all property conveyed or disposed of by the Defendant during the past two (2) years by sale, gift, or otherwise, stating the name and address of each person to whom the disposition was made. Include any conveyances, transfers, fits, or other dispositions of property made with any reservation of rights, benefits, or options running to the Defendant's for the reacquisition of the property at some future date.

RESPONSE:

REQUEST 19:

If the Defendant has at any time in the past six (6) months either sold, transferred, or assigned, in bulk, all or a substantial part of the Defendant's stock in trade or trade fixtures, describe the property disposed of, and state the name and address of each transferee or assignee and the date on which the transactions took place.

RESPONSE:

REQUEST 20:

If any property of the Defendant is rented, leased or otherwise in possession of a third party, state a description of the property, the name and address of the person, firm, or other entity who has possession of the property, whether the property is rented, leased, or otherwise in possession of a third party, the consideration received by the corporation and the name and address of the person who receives the rents, or other remuneration, for the Defendant.

RESPONSE:**REQUEST 21:**

If the Defendant, from the date it was formed to the date of these questions, suffered any casualty loss from fire, wind, theft, or otherwise, for each loss, state: a description of the property lost or damaged; the cause of the loss; the date of the loss; the amount of the loss; and whether the loss was covered by the insurance, and if so, the name of the insurer, the policy number and policy limits; whether a claim has been filed and if the claim has been paid and, if so, in what amount.

RESPONSE:**REQUEST 22:**

List all the creditors of the Defendant by name and address, the amount of the debt owed, the date the debt was incurred, the consideration the corporation received for the debt, a description of the security given to secure the debt, and list, by name, address and amount, all payments the Defendant has made to any creditor within the past four (4) months.

RESPONSE:**REQUEST 23:**

State the name and contact information (home address, phone number and email address) for each officer and director of the Defendant over the past 48 months.

RESPONSE:**REQUEST 24:**

If the Defendant has prepared or issued a financial statement within the past three (3) years, state: why each statement was prepared and issued; the name and address of each person, firm, corporation, partnership, mercantile or trade agency, or other organization to whom they were issued; and the present ownership and location of each asset shown.

RESPONSE:

REQUEST 25:

If the Defendant has, at any time during the past two (2) years, taken an inventory of its property, state: the date of inventory; the name and address of the person who took the inventory or supervised the taking of the inventory, the name and address of each person having possession of a copy of the inventory; the total dollar value of the corporation's property stated in the inventory; whether the inventory was taken at cost, market, or other valuation; why each inventory was taken; whether the inventory was of personal or business property; and the items included in the inventory.

RESPONSE:

UNOFFICIAL COPY

VERIFICATION

STATE OF TEXAS §
COUNTY OF _____ §

BEFORE ME, the undersigned notary, on this day personally appeared _____, a person whose identity is known to me. After I administered an oath to him, upon his oath he stated:

“My name is _____. I am capable of making this affidavit. Each and all of the foregoing Answers to Plaintiff's Interrogatories are within my personal knowledge and are true and correct.”

Signature of Affiant

SUBSCRIBED AND SWORN to this _____ day of _____, 2025.

Notary Public
State of Texas

REQUEST FOR PRODUCTION

Unless stated otherwise, the time period for all questions is from January 1, 2019, until and including the present.

YOU ARE REQUESTED TO PRODUCE AS FOLLOWS:

1. The corporate charter, minutes and by-laws of the Defendant.
2. All bank statements, check registers and canceled checks from all bank accounts of the Defendant for the past thirty-six (36) months, whether said accounts are now open or closed.
3. All insurance policies of every kind and nature, including but not limited to liability, workmen's compensation and *umbrella* (with all schedules, riders, supplements and endorsements), on which the corporation has paid any premium during the past thirty-six months.
4. All United States Income Tax returns filed by the corporation, either separately or jointly with others, during the past thirty-six months, including information returns and declarations of estimated tax.
5. All deeds and documents of legal or equitable title for all real estate in which the Defendant has any legal or equitable interest.
6. All certificates evidencing ownership of common or preferred capital stock in any corporation, mutual fund, bond fund or investment trust issued to the witness or any attorneys-in-fact, agents, servants, employees or trustees acting on the Defendant's behalf or for the corporation's interest.
7. All leases or other executory contracts of whatever kind or nature to which the corporation is a party or in which the Defendant has any legal or equitable interest.
8. All security documents and corresponding financing statements securing indebtedness owed by the Defendant.
9. All security documents and corresponding financing statements securing indebtedness to the Defendant.
10. All financial statements, including balance sheets and profit and loss statements, issued within the last four years by the Defendant.
11. All financial statements, including balance sheets and profit and loss statements, issued within the last four years by the Defendant.

12. All passbooks, current statements, or other documents evidencing current status of all savings accounts, profit sharing plan accounts, pension plan accounts, individual retirement accounts, KEOGH plan accounts and certificates of deposit in which the Defendant has any legal or equitable interest.
13. All records of accounts receivable owned by the Defendant for the past thirty-six months.
14. A complete list of all accounts and notes receivable due to the corporation showing amounts owed and names of entities owing funds to the Defendant for the past 48 months.
15. All documents evidencing money or deposit in accounts in banks, savings institutions, brokerage houses or other financial institutions, which accounts stand in the Defendant's name or from with the witness has the right to withdraw funds or which are subject to the witness' control.
16. All bonds, debentures, promissory notes and other evidence of indebtedness payable to the Defendant or any agent, trustee, attorney-in-fact or any other person or entity acting on its behalf.
17. All Joint Venture Agreements, Limited Partnership Agreements, Certificates of Limited Partnership and Partnership Agreements executed by the corporation or any agent, officer, attorney-in-fact or trustee acting in behalf of or for the Defendant.
18. All certificates of title, licensing and registration for any and all motorcycles, automobiles, trucks, cabs, motor homes, mobile homes, boats, airplanes and livestock held in the name of the Defendant.
19. All cashier's checks, money orders, certificates of deposit, traveler's checks, drafts, letters of credit, bills of exchange or other commercial paper payable to bearer or the corporation or its agent, attorney-in-fact or other person acting on behalf of the corporation in the possession of or under the control of the Defendant.
20. All Oil and Gas Leases and Division Orders in which the Defendant has any interest, either as Lessor, Lessee, Trustee or Beneficiary.
21. A copy of all checks paid to any owner, officer or director of the Defendant in the past 24 months.
22. A copy of all loan documents concerning any and all real estate owned or controlled by the Defendant.
23. A copy of all documents that show the payment of real estate taxes in the past 24 months.
24. A copy of all documents directed to an accountant in the past 12 months.

25. A copy of all credit card statements for the past 12 months.
26. A copy of all agreements by and between the Defendant and any owner, officer or director of the Defendant.
27. A copy of all loan documents in the name of Defendant for the past 60 months.
28. A copy of contracts between the Defendant and any financial institution for the past 60 months.
29. A copy all deeds for real estate owned by the Defendant for the past 15 years.
30. A copy of all loan documents concerning real estate owned by the Defendant for the past 15 years.
31. A copy of all payments to any individual or business for a loan related to real estate.
32. A copy of all payments to any individual or business for the repayment of a loan over the past 48 months.
33. A copy of all full credit card statements for the past 36 months.
34. A copy of all documents that show air miles owned by the Defendant for the past 24 months.
35. A copy of all documents that show the ownership of a sports license or licenses.
36. A copy of all documents that show the ownership or rights to season tickets to one or more sporting event for the past 36 months.
37. A copy of all documents that show the ownership or rights to season tickets to any form of entertainment, including but not limited to theatre, plays or sports for the past 60 months.
38. A copy of all documents that show the ownership of cryptocurrency.
39. A copy of all documents that show the ownership of one or more patent for the past 15 years.
40. A copy of all documents that show the sale of one or patent over the past 60 months.
41. A copy of all insurance policies in at least the name of the Defendant for the past 48 months.
42. A copy of the documents that show the ownership of art work(s) valued at over \$500.00 dollars.

- 43. A copy of the documents that show the ownership of one or motor vehicle.
- 44. A copy of the documents that show the ownership of one or more boat.
- 45. A copy of the documents that show the ownership of one or more motorcycle.
- 46. A copy of the documents that show the partial ownership in any asset valued at over \$1000.00 dollars.
- 47. A copy of the documents that show the last 20 checks written to any officer or director of the Defendant.
- 48. A copy of the documents that show a loan to any officer or director of the Defendant over the past 60 months.

UNOFFICIAL COPY

REQUEST FOR ADMISSIONS

Unless stated otherwise, the time period for each request is from January 1, 2019, to the present.

1. The Defendant has a bank account.
1. The Defendant has a savings account.
2. The Defendant owns an automobile.
3. The Defendant owns jewelry.
4. The Defendant owns more than \$60,000.00 worth of art.
5. The Defendant owns property not readily attachable by ordinary means.
6. The Defendant is insolvent.
7. The Defendant cannot pay its bills as they come due.
8. The Defendant has certificates of deposit.
9. The Defendant owns at least one boat.
10. The Defendant owns at least one motorcycle.
11. The Defendant owns contract rights against another individual or business.
12. The Defendant owns securities.
13. The Defendant owns marketable securities.
14. The Defendant owns negotiable instruments, including promissory notes, drafts and checks.
15. The Defendant owns or has present and future contract rights against another individual and/or business.
16. The Defendant owns a plane.
17. The Defendant owns a patent.
18. The Defendant owns intellectual property.
19. The Defendant has a pending lawsuit against another individual.

20. The Defendant has a pending lawsuit against a business.
21. The Defendant has a pending lawsuit, in its name, against another individual.
22. The Defendant has an account at a credit union.
23. The Defendant owns property that cannot readily be attached or levied on by ordinary legal process.
24. The Defendant owns property that cannot readily be attached or levied on by ordinary legal process and the property is not exempt from attachment, execution, or seizure for the satisfaction of liabilities.
25. The Defendant owns a partnership interest in at least one business.
26. The Defendant owns shares in at least one business.
27. The Defendant owns stock in at least one business.
28. The Defendant owns airline miles.
29. The Defendant owns cryptocurrency.
30. The Defendant is owed money from an individual.
31. The Defendant is owed money from at least one business.
32. The Defendant loaned money to an officer of the Defendant.
33. The Defendant loaned money to a director of the Defendant.
34. The Defendant owns a copyright.
35. The Defendant owns a trademark.
36. The Defendant owns the rights to its name.
37. The Defendant has a phone number.
38. The Defendant owns a computer.
39. The Defendant owns the rights to an asset valued at over \$500.00 dollars.
40. The Defendant owns the rights to one or more sports license.
41. The Defendant owns at least the partial rights to one or more sports license.

§

**POST-JUDGMENT REQUEST FOR PRODUCTION OF DOCUMENTS,
INTERROGATORIES AND REQUEST FOR ADMISSIONS**

TO: ROBERT WISEMAN JR., AKA AND BSPA ROBERT WISEMAN, ROBERT LEE WISEMAN JR., ROBERT LEE WISEMAN, ROBERT L. WISEMAN JR., ROBERT L. WISEMAN, R. L. WISEMAN JR., AND ROBERT L. WISEMAN SR., Defendant, pro, 12333 Sowden Road, Suite B, Houston, TX 77080.

Pursuant to Rules 196, 197, 198 and 621(a) of the Texas Rules of Civil Procedure, you are hereby requested to produce and permit the inspection and copying of certain documents or things that are described on the attached list marked Exhibit A. Such list is made a part hereof as if set out herein in full.

§ § § § § § § § § § § §

AT LAW NO. FOUR (4)

HARRIS COUNTY, TEXAS

WISEMAN HOMES LLC, AKA AND DBA WISEMAN HOMES; AND ROBERT WISEMAN JR., AKA AND BSPA ROBERT WISEMAN, ROBERT LEE WISEMAN JR., ROBERT LEE WISEMAN, ROBERT L. WISEMAN JR., ROBERT L. WISEMAN, R. L. WISEMAN JR., AND ROBERT L. WISEMAN SR.


TO: ROBERT WISEMAN JR., AKA AND BSPA ROBERT WISEMAN, ROBERT LEE WISEMAN JR., ROBERT LEE WISEMAN, ROBERT L. WISEMAN JR., ROBERT L. WISEMAN, R. L. WISEMAN JR., AND ROBERT L. WISEMAN SR., Defendant, pro,
12333 Sowden Road, Suite B, Houston, TX 77080.

Pursuant to Rules 196, 197, 198 and 621(a) of the Texas Rules of Civil Procedure, you are hereby requested to produce and permit the inspection and copying of certain documents or things that are described on the attached list marked Exhibit A. Such list is made a part hereof as if set out herein in full.

Such documents shall be produced for inspection and copying within thirty (30) days of service on you, at the offices of TOTZ ELLISON & TOTZ, P.C., 2211 NORFOLK, SUITE 510, HOUSTON, TEXAS 77098.

Respectfully submitted,

TOTZ ELLISON & TOTZ, P.C.

By: 
JON D. TOTZ
TBA # 20148000
2211 Norfolk, Suite 510
Houston, Texas 77098
Phone: 713-275-0303
Fax: 713-275-0304
Email: jtotz@tetlegal.com
E-Service: service@tetlegal.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 11 day of April, 2025 a true and correct copy of Plaintiff's Post-Judgment Request for Production of Documents, Admissions, and Interrogatories has been forwarded to the following party/parties in accordance with the Texas Rules of Civil Procedure, via electronic means, if possible, and/or by the means stated below.

Regular Mail

Robert Wiseman Jr.
12333 Sowden Road, Suite B
Houston, TX 77080


JON D. TOTZ

EXHIBIT A
DEFINITIONS AND INSTRUCTIONS

As used herein, the term *document* shall mean all written, reported, recorded or graphic matter, within the scope of Rule 192 of the Texas Rules of Civil Procedure, produced or reproduced, now or at any time in your possession, custody, or control, including, but not limited to, all writings, letters, correspondence, telegrams, teletypes, telexes, communications, memoranda, drafts, records, books of account, ledgers, balance sheets, financial statements, diaries, calendars, journals, minutes, contracts, agreements, drafts of contracts, insurance policies, papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, and any other data compilations from which information can be obtained and translated into reasonably usable form, memoranda of telephone or personal conversations or conferences, telephone logs, notes, notebooks, interoffice communications, microfilm, bulletins, circulars, schedules, lists, guides, pamphlets, brochures, studies, surveys, notices, summaries, physical models, reports, bank records, tax return(s), analyses, manuals, agenda, announcements, instructions, worksheets, price sheets, catalogs, invoices, checks, vouchers, statements, credit memoranda, sales slips, promissory notes, newspaper inserts, computer listings, and other data compilations, computer tapes, computer printouts, and all other forms of computerized data, billing or credit maintained in machine readable form, textbooks, deeds of trust, title for automobile, title for airplane, treatises, tapes or other recordings or transcriptions of recordings, notes or summaries prepared or relating to any of the foregoing, and each copy of any of the foregoing which is not identical because of marginal notations or otherwise, whether in the possession of the Witness or any attorney or former attorney for the Witness or any agent or representative of the Witness.

Pursuant to Rule 192 of the Texas Rules of Civil Procedure, you are required to produce any documents or tangible things within your possession, custody or control. If any document requested was formerly but is no longer in your possession, custody or subject to your control, state what disposition was made of it, and the date or dates, or approximate date or dates, on which such disposition was made.

If any documents are withheld under claim of privilege, state with respect to each such documents:

- (a) The privilege under which the document is being withheld;
- (b) A description of the character or type of document involved;
- (c) A general description of the subject matter of the document;
- (d) The date the document was prepared;
- (e) The author or signatory of the document;
- (f) Persons to whom the document is addressed and persons to whom thereof copies were furnished together with their job titles; and
- (g) The present depository of the documents.

POST-JUDGMENT REQUEST FOR PRODUCTION OF DOCUMENTS

Unless stated otherwise, the time period for all questions is from January 1, 2019, until and including the present.

1. All documents, including Deeds, Deeds of Trust, Assignments, financing statements, Promissory Notes, and renewals and extensions thereof, which evidence any ownership interest, legal or equitable, of Defendant in any real property which the Defendant has had at any time from January 1, 2007, to the present, whether located in Texas or elsewhere.
2. Any and all documents evidencing any indebtedness of Defendant secured by real property, together with the terms of payment thereof, and the time at which such indebtedness was incurred, and the name of each party to whom such indebtedness was or is payable.
3. All documents indicating the value of any real estate in which Defendant has a legal or equitable interest.
4. All bank statements, original canceled checks, original deposit slips, and ledger books for any and all accounts on which Defendant has or has had authority to sign at any time from January 1, 2007, to the present, whether such accounts are now opened or closed.
5. All documents evidencing ownership in any security, stock, mutual fund, bond fund or investment trust, whether issued to Defendant or to any attorney-in-fact, agents, servants, employees or trustees acting on behalf or for Defendant's interest.
6. All Promissory Notes or other documents evidencing any indebtedness on which the Defendant is obligated at the present time.
7. All financial statements, statements of financial condition, cash flow statements or income statements prepared for or on behalf of the Defendant within the last three (3) years and all schedules supporting same or work papers used in the preparation of same.
8. All financial statements, including balance sheets and profit and loss statements, issued within the last three years by any business in which Defendant has owned or has any legal or equitable interest.
9. All financial statements, including profit and loss statements, issued within the last four years, by any business in which Defendant owns or has owned any legal or equitable interest.
10. Any and all documents relating to any agreements whereby another person or entity is given the right or option to acquire or hold property on behalf of or for the benefit of the Defendant.

11. All written Partnership Agreements, Limited Partnership Agreements, and Joint Venture Agreements to which the Defendant is a party, together with the most recent profit and loss statement of each such partnership or venture, and the most recent Federal Income Tax Return and supporting Schedules filed for each such partner or venture.
12. All documents evidencing ownership in any partnership, including but not limited to Limited Partnership Certificates, Subscription Agreements, Limited Partnership Agreements, General Partnership Agreements, Limited Partnership Signature Pages, certificates or other documents evidencing ownership of any Limited Partnership or General Partnership interests.
13. The three (3) most recent U.S. Federal Income Tax Returns and forms 940 and 941 and any similar returns filed in any foreign country filed on the Defendant's behalf, together with all attachments and Schedules submitted with each such return.
14. All confirmation slips, monthly, quarterly, and annual statements of account and position held by the Defendant at any brokerage house, bank, financial institution, or other entity through which the Defendant has bought or sold any securities, options, or future contracts at any time from January 1, 2007, through the present date; such documents to include any received by or on the Defendant's behalf from January 1, 2007, through the present.
15. All assignments of royalty interest, overriding royalty interest, working agreements, mineral deeds, or other instruments evidencing any ownership or leasehold interest held by the Defendant in any oil, gas or other minerals or rights thereto.
16. All contracts for sale, contracts of employment, contracts, promissory notes, or other documents which have resulted in the Defendant receiving any money or other remuneration within the past three (3) years, or under which the Defendant may receive money or other remuneration at any time in the future.
17. The most recent petition or answer filed on the Defendant's behalf in any lawsuit in which the Defendant is a party Plaintiff or party Defendant, other than the above styled and numbered cause.
18. Any and all documents concerning the Defendant's ownership of, or sale of, any horse or livestock of any description at any time from January 1, 2007, to the present.
19. All notices of tax liens, or claims sent to the Defendant on behalf of any governmental agency from January 1, 2007, to the present date.
20. Any savings account pass book or other indicia of any ownership in any account at any savings institution in the U.S. or any foreign country, or savings account held at any banking or other financial institution, and to include the most recent statement concerning the balance in each such account.
21. Any and all trust agreements, or any other agreements naming the Defendant as a Trustee or

as a beneficiary.

22. Any and all Trust Agreements executed by the Defendant in favor of anyone else within the last three years.
23. Any and all documents concerning or relating to any contributions made by the Defendant to any trusts within the last three (3) years.
24. The original or duplicate original Certificate of Title or other title documents to all automobiles, trucks, trailers, aircraft, mobile homes, trailer houses, recreational vehicles, campers, or boats in which the Defendant claims any interest, and true copies of the fact sheet of each insurance policy on each.
25. All appraisals, photographs, inventories, or other documents concerning any jewelry, coins, works of art, objects of art, or stamps owned by the Defendant.
26. All lease agreements and other written papers whatsoever in which the Defendant is named as a lessor of any property whether such property be real, personal or mixed.
27. Any and all assumed name certificates under which the Defendant does business.
28. Any and all life insurance policies purchased in whole or in part by the Defendant.
29. All written documents or papers of any kind reflecting the Defendant's ownership interest in any of the following types of property:
 - a. Patents, copyrights, trademarks, service marks, franchises, or other such licenses applied for or issued by any country;
 - b. Accounts receivable;
 - c. Judgment and Abstracts of Judgments.
30. All documents relating to any judgment recovered by the Defendant or a related entity against any person or entity whatsoever.
31. All documents which relate to a gift in excess of ONE THOUSAND (\$1000.00) DOLLARS which the Defendant has received in the last four (4) years.
32. All documents relating to any depository, including but not limited to safes, vaults, and safe deposit boxes to which the Defendant has access or in which the Defendant claims an interest.

33. All documents relating to any promissory notes, drafts, bills of exchange, or other commercial paper, savings bonds, or other government issued bonds in which the Defendant owns or claims an interest.
34. All bonds, debentures, promissory notes, and other evidence of indebtedness payable to Defendant or any agent, attorney-in-fact or any other person or entity acting on Defendant's behalf.
35. All documents relating to any letters of credit, money orders, cashier's checks, bank deposits, certificates of deposit, escrow funds, profit sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits or other retirement plans of any type whatsoever, in which the Defendant owns or claims an interest.
36. All documents, including but not limited to, tax returns, relating to any ownership interest in any business, partnership, joint venture, limited partnership, corporation, or other legal entity of any type whatsoever in which the Defendant owns or claims in interest.
37. All documents relating to any debts owed to the Defendant by any person or entity whatsoever, including but not limited to promissory notes and accounts receivable.
38. All documents relating to any conveyance, transfer, gift, or other disposition of any real or personal property made by the Defendant within the last three (3) years.
39. All documents relating to any government benefits which the Defendant is entitled to receive, including but not limited to, tax refunds.
40. All United States Gift Tax Returns filed by Defendant at any time after January 1, 2007.
41. Any Last Will & Testament and all Codicils thereto, executed by Defendant in the last ten years.
42. All documents that show, prove or substantiate a lawsuit filed in the Defendant's name.
43. All documents that show, prove or substantiate all intellectual property (patent, trademark or copyright) owned by the Defendant.
44. All documents that show, prove or substantiate the Defendant's ownership in any stock, bond, real estate, lawsuit or asset of any kind.
45. All documents that show, prove or substantiate the Defendant's ownership in any business, including but not limited to a partnership, LLC, LC, corporation, public or private, or Professional Corporation.
46. All documents that show an assignment from the Defendant to any individual in the past five (5) years.

47. All document that show an assignment from the Defendant to any business in the past five (5) years.
48. All documents which show, prove or substantiate a loan from the Defendant to any family member or business within the past seven (7) years.
49. All documents which show, prove or substantiate a loan from the Defendant to any individual in the past seven (7) years.
50. All documents which show, prove or substantiate any and all changes of the Defendant first or last name, in the past ten (10) years.
51. All documents which show, prove or substantiate all social security numbers the Defendant has used or had assigned to him or herself in the past fifteen (15) years.
52. All documents provided to any bank, credit union or savings in loan, when applying for credit or a loan, in the past five (5) years.
53. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for a loan for the purchase of real estate.
54. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of car.
55. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of boat.
56. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of motorcycle.
57. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of real estate.
58. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of real property.
59. All documents, including but not limited to a credit application, which were provided to any individual or business when the Defendant was applying for or trying to qualify for or obtain a loan for the purchase of a business.

60. All financial documents provided to an accountant in the last two (2) years.
61. A copy of the full credit card statement for the past 24 months.
62. A copy of all documents that show air miles owned or controlled by the Defendant.
63. A copy of documents that show the ownership of cryptocurrency.
64. A copy of the last 12 payments made to a credit card company.
65. A copy of the last 12 payments made to a mortgage company.
66. A copy of the last 12 rent (for real estate) payments made to any individual or company.
67. A copy of all pages of the Defendant's passport.
68. A copy of the Defendant's driver's license.
69. A copy of all documents that show all monies received by the Defendant over the past 12 months.
70. A copy of all documents that show assets owned by the Defendant outside the United States of America.
71. A copy of all documents that show the partial ownership of all assets located outside the United States of America.
72. A copy of all documents that show a payment towards an asset valued at over \$10,000.00 dollars for a son or daughter.
73. A copy of documents that show a wire transfer of more than \$49,000.00 dollars to any business, regardless of form.
74. A copy of documents that show a wire transfer of more than \$49,000.00 dollars to any individual.
75. A copy of documents that show a wire transfer of more than \$49,000.00 dollars to any partnership.

POST-JUDGMENT INTERROGATORIES

Unless stated otherwise, the time period for all questions is from January 1, 2019, until and including the present.

1. Please state your full name, date of birth, social security number, driver's license number, business address and telephone number, and residence address and telephone number.
2. Please state the name and address of your employer(s) for the time period January 1, 2007 to the present date, including your job title and responsibilities.
3. Please state the amount of your wages and full description of how all other compensation is computed and paid to you (whether commission, bonus, etc.).
4. Please state the full name and address of all businesses in which you have had an interest in the preceding five (5) years, together with a description of the business and your interest therein.
5. Describe all income by amount, source and name of payor of all income received by you or your spouse from every source other than wages, in the last five (5) years.
6. Please identify all business, personal or joint bank accounts, savings accounts, checking accounts, certificates of deposit, money market accounts, individual retirement accounts, Keogh accounts, or trust accounts (either as settlor, trustee, or beneficiary) in which you have an interest indicating name and address of bank, account number, name of account owner, and current balance.
7. Please state the institution name and identifying number of all institutions in which you have a safety deposit box or other depository for valuable goods.
8. Please state the legal description, name of record owner, and common address of all real property or oil and gas leases which you or your spouse own, or have any interest in.
9. Itemize in detail all assets, whether tangible or intangible, owned by you or your spouse, stating the owner, a description of the assets, its fair market value, and location.
10. Fully describe all commodities, stock and other securities owned by you or your spouse. Please state: the number of shares, corporation, present location, description of certificates or other evidence of ownership, serial or identifying number of each, and current market value.
11. If you or your spouse own any interest in a boat, motor vehicle, trailer, airplane, gun or animal, please state the purchase price, current indebtedness, location, serial or model number of each, and a complete description of each item.

12. Please list all persons who owe you money, including name and address of debtor and amount owed.
13. Describe in full all mortgages, liens, promissory notes or other encumbrances held by you or your spouse or attach a copy of each to your answers. Include in your answer all amounts still owing to you and when the obligation is anticipated to be retired.
14. As to each policy of insurance you have had in the past five (5) years, please state the name of each carrier, policy number, term and current cash value.
15. If you or your spouse are entitled to any money from any governmental agency, please state the name of the entity from which you are entitled to this money, the amount and the circumstances surrounding each entitlement.
16. If you have prepared or issued any financial statement within the past ten (10) years, attach a copy of each such financial statement to your answers of these Interrogatories, or set forth the contents of such verbatim.
17. Set forth verbatim the contents of your income tax returns for each of the past three (3) years or attach a photocopy of each such return.
18. If you have transferred, conveyed, or disposed of any real or personal property or other assets, either by sale, gift, assignment or otherwise, in the past four years, state each item transferred, conveyed or disposed of, date of disposition, name and address of person receiving, manner of disposition, and consideration received.
19. If during the past ten (10) years, you or your spouse have been a beneficiary of, or contributed to any trust, please state: When the trust was created, the name and address of each trustee and beneficiary, the property contributed to the trust.
20. If you or your spouse are a beneficiary under the terms of the will of any person now deceased, please state the name of the decedent as well as the court in which such estate is pending.
21. If you or your spouse have received any property or money by way of inheritance, please state the name of the decedent and the court having jurisdiction of said estate. Also, fully describe any distribution made to you.
22. If at any time in the past five (5) years, you have entered into any transaction with your spouse or any other relative involving the transfer of any of your real or personal property, fully describe the transaction and the property transferred.
23. If you or your spouse have ever received a court settlement or judgment in your behalf or have lawsuits pending, please identify each by court and cause number, giving the amount sued for and the amount received, if any. If the suit is pending, state the status thereof.

24. If you now have any claim for money against any others by reason of notes, claims for damages, or the like, then state a complete description of the claim; name and address of the person indebted to you; amount of the claim; and description of any suit or action filed regarding such claim.

25. List the address and legal description of all real property owned or controlled by the Defendant.

COPY

UNOFFICIAL

The following affidavit is to be completed by party answering the Interrogatories:

AFFIDAVIT

STATE OF _____ §
COUNTY OF _____ §

BEFORE ME, the undersigned authority, personally appeared _____,
who after being duly sworn, did depose and state that he/she has personal knowledge of the
foregoing Answers to Interrogatories and the foregoing Answers are true.

Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, this _____ day of _____, 2025.

NOTARY PUBLICIN AND FOR THE
STATE OF _____
COUNTY OF _____

REQUEST FOR ADMISSIONS

Unless stated otherwise, the time period for all questions is from January 1, 2019, until and including the present.

1. The Defendant has a bank account.
2. The Defendant has a savings account.
3. The Defendant owns more than one automobile.
4. The Defendant owns more than \$60,000.00 worth of jewelry.
5. The Defendant owns more than \$60,000.00 worth of art.
6. The Defendant owns property not readily attachable by ordinary means.
7. The Defendant is insolvent.
8. The Defendant cannot pay bills as they come due.
9. The Defendant has certificates of deposit.
10. The Defendant owns at least one boat.
11. The Defendant owns at least one motorcycle.
12. The Defendant owns contract rights against another individual or business.
13. The Defendant owns securities.
14. The Defendant owns marketable securities.
15. The Defendant owns negotiable instruments, including promissory notes, drafts and checks.
16. The Defendant owns or has present and future contract rights against another individual and/or business.
17. The Defendant owns a plane.
18. The Defendant owns a patent.
19. The Defendant owns intellectual property.
20. The Defendant has a pending lawsuit against another individual.

21. The Defendant has a pending lawsuit against a business.
22. The Defendant has a pending lawsuit against another individual.
23. The Defendant has a claim for damages against another individual.
24. The Defendant has a claim for damages against a business.
25. The Defendant has an account at credit union.
26. The Defendant owns property that cannot be attached by ordinary means.
27. The Defendant owns property that cannot readily be attached or levied on by ordinary legal process.
28. The Defendant owns property that cannot readily be attached or levied on by ordinary legal process and the property is not exempt from attachment, execution, or seizure for the satisfaction of liabilities.
29. The Defendant owns a partnership interest in at least one business.
30. The Defendant owns shares in at least one business.
31. The Defendant owns stock in at least one business.
32. The Defendant owns airline miles.
33. The Defendant owns cryptocurrency.
34. The Defendant is owed money from an individual.
35. The Defendant is owed money from at least one business.
36. The Defendant loaned money to another company.
37. The Defendant loaned money to a family member.
38. The Defendant owns a copyright.
39. The Defendant owns a trademark.
40. The Defendant owns a computer.
41. The Defendant owns the rights to an asset valued at over \$500.00 dollars.
42. The Defendant owns the rights to one or more sports license.

43. The Defendant owns at least the partial rights to one or more sports license.