

DJ

NO. 1220455

Answer Due
6-3-24PNC BANK, NATIONAL
ASSOCIATION,
Plaintiff§
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§
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§
§
§IN THE COUNTY COURT
AT LAW NO 2LKA
NMA
SWN

v.

RAY L SHACKELFORD,
Defendant(s)

HARRIS COUNTY, TEXAS

DEFAULT JUDGMENT

On this date, the Plaintiff's Motion came on to be considered wherein PNC BANK, NATIONAL ASSOCIATION is "Plaintiff" and RAY L SHACKELFORD is "Defendant(s)". Plaintiff appeared by its attorney of record, and Defendant(s), although duly and legally cited to appear and answer, failed to appear and answer, default.

Citation was served according to law and returned to the clerk for the time required by law. Considering the motion, evidence and pleadings, the Court grants the motion and finds that Defendant(s) is indebted to Plaintiff for the amount of \$3,593.10.

IT IS THEREFORE ORDERED, ADJUDGED, and DECREED that Plaintiff, PNC BANK, NATIONAL ASSOCIATION, have and recover of and from Defendant(s), RAY L SHACKELFORD, the following:

1. \$3,593.10 as the principle sum for the balance due, owing and unpaid.
2. \$0.00 as costs in this proceeding.

Plaintiff shall have all writs and other process necessary to enforce this Judgment. All relief not expressly granted herein is denied. This Judgment finally disposes of all parties and all claims, and is appealable.

SIGNED and ENTERED this _____ day of **10/14/2024**, 20____.

JUDGE PRESIDING: _____

APPROVED AS TO FORM:

Todd Hinds
☐ LARANDOL COWART, ESQ. SBN 24093489
☐ MADIHA RIZVI, ESQ. SBN 24118513
☐ DARREN BENDER, ESQ. SBN 24099904
☒ TODD HINDS, ESQ. SBN 24103640
☐ LAKIA N. BALDWIN, ESQ. SBN 24130897
ZWICKER & ASSOCIATES, P.C.

A Law Firm Engaged in Debt Collection
 Attorneys for Plaintiff
 14090 SW FREEWAYSUITE 408
 SUGAR LAND, TX 77478
 TEL: (281)494-0300/FAX: (281)494-0213
 EMAIL: ZATE_LITIGATION@ZWICKERPC.COM

FILED
 10/14/2024 4:01:07 PM
 Teneshia Hudspeth
 County Clerk
 Harris County, Texas
 avillafranca

NO. 1220455

PNC BANK, NATIONAL
ASSOCIATION,

Plaintiff

v.

RAY L SHACKELFORD,

Defendant(s)

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§

IN THE COUNTY COURT

AT LAW NO _____

HARRIS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

PNC BANK, NATIONAL ASSOCIATION, ("Plaintiff"), complains of RAY L SHACKELFORD, ("Defendant(s)"), and for its cause of action would respectfully show the Court as follows:

1. This cause of action is governed by the rules for Expedited Actions under the Texas Rules of Civil Procedure Rule 169 because the Plaintiff is seeking only monetary relief of two-hundred and fifty thousand dollars or less excluding interest, statutory or punitive damages and penalties, and attorney's fees and costs. Discovery is intended to be conducted under Level 1 of Rule 190.2 of the Texas Rules of Civil Procedure. Damages sought are within the jurisdictional limits of the court.
2. Plaintiff is a national banking association organized under the laws of the United States with its principal place of business in Pennsylvania. Plaintiff may be contacted through the undersigned attorney.

3. Defendant(s) is/are a resident(s) of HARRIS County, Texas, and may be served with process at 4743 IVANHOE, HOUSTON, TX 77027. Venue is proper in this Court because Defendant(s) resides/reside in this county at the time of the filing of this suit.

BREACH OF WRITTEN CONTRACT

4. Defendant(s) obtained a credit account from Plaintiff. The credit account is identified as ending in account number 895.
5. Plaintiff and Defendant(s) entered into a credit account agreement ("the Agreement"). Under the terms of the Agreement, Plaintiff rendered credit services to Defendant(s). Defendant(s) accepted the credit services and under the Agreement became bound to pay Plaintiff the amounts of such credit services, plus additional amounts due under the Agreement.
6. Defendant(s) has/have failed to repay all of the credit services rendered under the Agreement. The current balance due, owing and unpaid under the Agreement, after allowing all just and lawful payments, credits and offsets, is \$3,593.10. The terms of the Agreement control the accrual of additional charges, interest, and other amounts. Plaintiff has made demand upon Defendant(s) for payment of the balance due under the Agreement, but Defendant(s) has/have failed to pay the balance.
7. All conditions precedent to Plaintiff's right to bring suit on its claims have been performed or have occurred.

Wherefore, Plaintiff demands judgment in the amount of \$3,593.10 against Defendant(s),
and court costs to the extent permitted by applicable law.

Respectfully submitted,

ZWICKER & ASSOCIATES, P.C.

A Law Firm Engaged in Debt Collection

Attorneys for Plaintiff

14090 SW FREEWAY, SUITE 408

SUGAR LAND, TX 77478

TEL: (281)494-0300

FAX: (281)494-0213

EMAIL: ZATE_LITIGATION@ZWICKERPC.COM

BY: *LaRandol Cowart*
☐ **TABITHA HAYNES, ESQ.**
State Bar Number 24118986
☐ **JASMINE LEWIS, ESQ.**
State Bar Number 24104830
☐ **KEYDRA JONES, ESQ.**
State Bar Number 24134464
☒ **LARANDOL COWART, ESQ.**
State Bar Number 24093489
☐ **MIA J. WILLIAMS-COLLINGS,**
ESQ.
State Bar Number 24115010

Court Stamp Here

RETURN OF SERVICE

Notice: This document contains sensitive data

Court	County Court at Law No. 2 Harris County, Texas	
Plaintiff	PNC BANK, NATIONAL ASSOCIATION	Cause # 1220455
Defendant(s)	RAY L SHACKELFORD	Came to Hand Date/Time 3/15/2024 6:40 PM
Manner of Service	Posted	Service Date/Time 5/08/2024 8:14 PM
Documents	Citation; Petition; Order Authorizing Alternate Service	Service Fee: \$77.91

I am certified under order of the Judicial Branch Certification Commission to serve process, including citations in Texas. I am not a party to or interested in the outcome of this lawsuit. My information; identification number, birth date, address, and certification expiration date appear below. I received and delivered the Specified Documents to Defendant as stated herein.

On 5/08/2024 at 8:14 PM: I served Citation, Petition and Order Authorizing Alternate Service upon RAY L SHACKELFORD by posting per T.R.C.P. Rule 106(b) Order, securely affixing 1 true and correct copy(ies) thereof, to the Front door at 4038 TURNBERRY CIR, HOUSTON, TX 77025-1714.

On 5/08/2024, I deposited a true copy of the Citation, Petition and Order Authorizing Alternate Service marked with confirmation of date and time in a first class postage paid envelope, in the United States mail.

I addressed the envelope to:

RAY L SHACKELFORD
4038 TURNBERRY CIR
HOUSTON, TX 77025-1714

On 5/08/2024, I deposited a true copy of the Citation, Petition and Order Authorizing Alternate Service by certified mail with return receipt requested, in the United States mail with proper postage.

I addressed the envelope to:

RAY L SHACKELFORD
4038 TURNBERRY CIR
HOUSTON, TX 77025-1714

The CMRR number is: 9589071052700922919883



My name is: **Venita Brown**. My date of birth is: **3/10/1967**

My address is: **10839 Shepherd Falls Lane, Houston, TX 77075, USA.**

My process server identification # is: **PSC 19239**. My Certification expires: **12/31/2024**.

Per U.S. Code § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Declaration executed in Harris county, TX.

Venita Brown

Venita Brown

05/11/2024

Date Executed

Ref 6359404



0122998719

zwicker_TX@abclegal.com



Zwicker & Associates, P.
C.

Tracking # 0132100657





OFFICE OF TENESHIA HUDSPETH
COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

Docket Number: 1220455

Receipt Number: Date: Sheriff/Constable Fee:

PNC BANK, NATIONAL ASSOCIATION

Plaintiff

VS.

RAY L SHACKELFORD

Defendant

In The County Civil Court at Law No. 2

201 Caroline #517

Houston, Houston 77002

THE STATE OF TEXAS
PLAINTIFF'S ORIGINAL PETITION CITATION

To: RAY L SHACKELFORD
4743 IVANHOE
HOUSTON, TX 77027

Attached is a copy of petition.

This instrument was filed on the **29th day of January, 2024**, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the county clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Issued and given under my hand and the seal of said court, at Houston, Texas, on this 30th day of January, 2024

(Seal)

Teneshia Hudspeth, County Clerk
County Civil Court at Law No. 2
201 Caroline, Suite 300
Harris County, Texas 77002

Matthew Simmons
Deputy County Clerk

Requested
By:

LA RANDOL COWART
ZWICKER & ASSOCIATES PC
14090 SW FREEWAY SUITE 408
SUGAR LAND, TX 77478

OFFICER'S RETURN

Came to hand on _____, at _____ o'clock __M. and

executed in _____ County, Texas, by delivering to each of the within named Defendants, in person, a true copy of this Citation together with the accompanying copy of the Plaintiff's petition, at the following time and places to-wit:

NAME	DATE			TIME	PLACE OR ADDRESS OF SERVICE
	Month	Day	Year	Hour / Min. - AM/PM	

and not executed as to the Defendant _____

the diligence used in finding said Defendant, being _____

and the cause of failure to execute this process is: _____

and the information received as to the whereabouts of the said Defendant, being: _____

_____, (Sheriff)

(Authorized Person) _____ (Constable)

Sworn to and subscribed before me this _____ day _____ County, Texas

of _____

By _____, Deputy

(Notary Public)

RETURN FOR NOTICE TO SERVE NON-RESIDENT DEFENDANT

STATE OF _____ §

COUNTY OF _____ §

Before me, the undersigned authority, personally appeared _____,

a person competent to make oath, and who by me being duly sworn, deposes and says: that this notice came to hand on _____

_____, at _____ o'clock A.M./P.M., and executed by delivering

to defendant, _____, in person, at _____

in _____, County _____, State of _____

_____, on _____, at _____ o'clock

A.M./P.M., a true copy of the notice, with a copy of plaintiff's petition attached thereto. He further says that he is in no manner interested in this Suit.

Sworn to and subscribed before me,

_____, (Sheriff)

_____, (Constable)

_____, County,

State of _____

By _____ Deputy



OFFICE OF TENESHIA HUDSPETH
COUNTY CLERK, HARRIS COUNTY, TEXAS
COUNTY CIVIL COURTS DEPARTMENT

Docket Number: 1220455

Receipt Number: Date: Sheriff/Constable Fee:

PNC BANK, NATIONAL ASSOCIATION

Plaintiff

VS.

RAY L SHACKELFORD

Defendant

In The County Civil Court at Law No. 2

201 Caroline #517

Houston, Houston 77002

THE STATE OF TEXAS
PLAINTIFF'S ORIGINAL PETITION CITATION

To: **RAY L SHACKELFORD**
4743 IVANHOE
HOUSTON, TX 77027

Attached is a copy of petition.

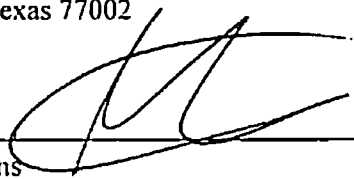
This instrument was filed on the **29th day of January, 2024**, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the county clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Issued and given under my hand and the seal of said court, at Houston, Texas, on this 30th day of January, 2024

(Seal)

Teneshia Hudspeth, County Clerk
County Civil Court at Law No. 2
201 Caroline, Suite 300
Harris County, Texas 77002


Matthew Simmons
Deputy County Clerk

Requested By: **LA RANDOL COWART**
ZWICKER & ASSOCIATES PC
14090 SW FREEWAY SUITE 408
SUGAR LAND, TX 77478

Came to hand on _____, at _____ o'clock __M. and

NAME	DATE			TIME	PLACE OR ADDRESS OF SERVICE
	Month	Day	Year	Hour / Min. - AM/PM	

and not executed as to the Defendant _____

the diligence used in finding said Defendant, being _____

and the cause of failure to execute this process is: _____

and the information received as to the whereabouts of the said Defendant, being: _____

(Authorized Person) _____ (Sheriff)
Sworn to and subscribed before me this _____ day _____, _____ (Constable)
County, Texas

of _____

(Notary Public)

STATE OF _____ §

COUNTY OF _____ §

Before me, the undersigned authority, personally appeared _____,
a person competent to make oath, and who by me being duly sworn, deposes and says; that this notice came to hand on _____
_____, at _____ o'clock A.M./P.M., and executed by delivering
to defendant, _____, in person, at _____
in _____, County _____, State of _____
_____, on _____, at _____ o'clock
A.M./P.M., a true copy of the notice, with a copy of plaintiff's petition attached thereto. He further says that he is in no manner interested in this Suit.

Sworn to and subscribed before me,

_____ (Sheriff)

_____ (Constable)

_____, County.

State of _____

By _____ Deputy