
CSD VAN ZANDT LLC ATTORNEY: WATKINS, KATRYNA

1021 ESE LOOP 323, SUITE 200

TYLER, TX 75701 (903)534 - 8063

-- VS.--

BIRNBAUM, UDO ATTORNEY:

CAUSE OF ACTION: TRESPASS TO TRY TITLE

FILE DATE: 08/24/2022

NATURE OF PROCEEDINGS DATE ______ ORIGINAL PETITION 08/24/2022

PLAINTIFF'S ORIGINAL PETITION AND APPLICATION FOR TEMPORARY INJUNCTION ISSUE CITATION 08/24/2022

08/24/2022 JURY FEE

08/24/2022 RECEIPT ISSUED

214999

08/24/2022 ISSUE CITATION

UDO BIRNBAUM CITATION ISSUED ENV# 67633331/ST/HP

08/29/2022 ANSWER

ANSWER AND COUNTERCLAIM

08/30/2022 CITATION RETURNED

UDO BIRNBAUM CITATION RETURNED EXECUTED ON 08/25/2022

09/29/2022 AMENDED FILING

FIRST AMENDED ANSWER, COUNTER, CROSS, TRESPASS TO TRY TITLE, INJUSTION, LAW

LICENSES, CRIMINAL REFER

ISSUE CITATION 09/29/2022 09/29/2022 ISSUE CITATION 09/29/2022 ISSUE CITATION 09/29/2022 ISSUE CITATION 09/29/2022 RECEIPT ISSUED 215551

09/29/2022 ISSUE CITATION

ROBERT O. DOW-CITATION ISSUED BY HAND TO UDO BIRNBAUM

09/29/2022 ISSUE CITATION

COREY KELLAM-CITATION ISSUED BY HAND TO UDO BIRNBAUM

09/29/2022 ISSUE CITATION

CELIA C. FLOWERS-CITATION ISSUED BY HAND TO UDO BIRNBAUM

09/29/2022 ISSUE CITATION

VAN ZANDT COUNTY-CITATION ISSUED TO UDO BIRNBAUM

09/30/2022 CERTIFICATE OF CERTIFICATE OF WRITTEN DISCOVERY

10/20/2022 AMENDED FILING

PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION AND APPLICATION FOR TEMPORARY INJUNCTION

10/20/2022 MOTION (NO FEE)

PLAINTIFF'S TRADITIONAL MOTION FOR SUMMARY JUDGMENT

10/20/2022 NOTICE NOTICE OF HEARING ENV#69447981 10/21/2022 DOCKET NOTE

FIRST SET OF INTERROGATORIES TO CSD VAN ZANDT LLC

CAUSE OF ACTION: TRESPASS TO TRY TITLE

FILE DATE: 08/24/2022

DATE NATURE OF PROCEEDINGS

10/28/2022 PROPOSED ORDER

PROPOSED*ORDER GRANTING PLAINTIFF'S TRADITIONAL MOTION FOR SUMMARY JUDGMENT

11/03/2022 RESPONSE

RESPONSE IN OPPOSITION TO THIS COURT'S SETTING FOR HEARING BY SUBMISSION OF

PLAINTIFF'S MSJ FOR NOV.14,2022

11/11/2022 CERTIFICATE OF WRITTEN DISCOVERY

CERTIFICATE OF WRITTEN DISCOVERY

11/14/2022 ANSWER/CONTEST/RESPONSE/WAIVER-FAM

PLAINTIFF'S REPLY TO DEFENDANT'S RESPONSE IN OPPOSITION TO HEARING BY SUBMISSION OF

PLAINTIFF'S MSJ FOR 11/14/22

11/14/2022 OBJECTION

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S EXHIBIT EVIDENCE

12/12/2022 MOTION (NO FEE)

MOTION FOR RCP 190.4 LEVEL 3 DISCOVERY CONTROL PLAN

12/12/2022 REQUEST

FIRST REQUEST FOR PRODUCTION OF CSD VAN ZANDT LLC

12/12/2022 MOTION (NO FEE)

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT RCP RULE 166 A (I) NO EVIDENCE TO CSD CLAIM

OF TITLE

12/29/2022 MOTION (NO FEE)

PLAINTIFF'S MOTION TO QUASH AND OBJECTIONS TO DEFENDANT'S NOTICE OF DEPOSITION OF CSD

VAN ZANDT LLC

12/30/2022 CERTIFICATE OF WRITTEN DISCOVERY

CERTIFICATE OF WRITTEN DISCOVERY

01/10/2023 MOTION (NO FEE)

MOTION FOR SANCTIONS AND CRIMINAL REFER

02/07/2023 ANSWER

SECOND AMENDED ANSWER COUNTER, CROSS, TRESPASS TRY TITLE, INJUCTION, LAW LICENSES,

CRIMINAL REFER

02/07/2023 MOTION (NO FEE)

MOTION IN RE BONHOEFFER'S THEORY OF STUPIDY

03/10/2023 VACATION LETTER

VACATION LETTER

03/15/2023 PROPOSED ORDER

PROPOSED ORDER GRANTING RCP 190.4 DISCOVERY CONTROL PLAN

03/15/2023 PROPOSED ORDER

PROPOSED ORDER ON MOTION FOR SANCTIONS

04/10/2023 NOTICE

NOTICE OF TRIAL SETTING ENV#74622761

04/11/2023 MOTION (NO FEE)

MOTION FOR JUDICIAL NOTICE OF FRAUD BY FLOWERS DAVIS LAWYERS UPON OWN CLIENT AND THIS

COURT

04/05/2023 PROPOSED ORDER

PROPOSED- ORDER ON MOTION FOR SANCTIONS

04/05/2023 NOTICE

DEFENDANT READY FOR TRIAL

04/19/2023 MOTION (NO FEE)

PLAINTIFF'S MOTION FOR ENTRY OF DISCOVERY CONTROL PLAN AND SCHEDULING ORDER

CAUSE OF ACTION: TRESPASS TO TRY TITLE

FILE DATE: 08/24/2022

DATE NATURE OF PROCEEDINGS

04/19/2023 PROPOSED ORDER

PROPOSED DISCOVERY CONTROL PLAN AND SCHEDULING ORDER

04/19/2023 NOTICE

NOTICE OF HEARING BY SUBMISSION ENV#75047404

04/24/2023 CERTIFICATE OF WRITTEN DISCOVERY

CERTIFICATE OF WRITTEN DISCOVERY

04/21/2023 MOTION (NO FEE)

MOTION TO COMPEL, SANCTIONS, AND CRIMINAL REFER RE A FLOWERS DAVIS PLLC VAN ZANDT

REAL ESTATE DEED FRAUD RING

05/02/2023 RESPONSE

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR DISCOVERY CONTROL PLAN AND RCP 220 AND

RCP 504.1(C) NON-AGREE TO BEN TRIAL

05/03/2023 NOTICE OF INTENTION

NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF UDO BIRNBAUM

05/08/2023 NOTICE

NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF LISA GIROT

05/08/2023 DESIGNATION OF

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

05/11/2023 CERTIFICATE OF WRITTEN DISCOVERY

CERTIFICATE OF WRITTEN DISCOVERY

06/15/2023

NOTICE OF WITHDRAWAL AS COUNSEL

06/19/2023 CERTIFICATE OF

REPORTER'S CERTIFICATE DEPOSITION OF LISA GIROT

NOTICE

07/14/2023 PROPOSED ORDER

PROPOSED ORDER DECLARING CSD VAN ZANDT TITLE AS VOID-NOT SIGNED BY THE JUDGE

07/14/2023 MOTION (NO FEE)

MOTION FOR SUMMARY ADJUDICATION OF TITLE

07/24/2023 LETTER

LETTER TO JUDGE MARTIN

08/09/2023 PROPOSED ORDER

DEFENDANT'S MOTION TO ORDER MEDIATION - TOOK DOWN TO WB

08/09/2023 RESPONSE

DEFENDANT'S RESPONSE TO THIS COURT'S INQUIRY

08/14/2023 ANSWER/CONTEST/RESPONSE/WAIVER-FAM

PLAINTIFF'S RESPONSE TO 1) DEFENDANT'S RESPONSE TO COURT'S INQUIRY AND 2) DEFENDANT'S

MOTION TO ORDER MEDIATION

08/17/2023 ORDER

ORDER DENYING DEFENDANTS MOTION FOR MEDIATION ENV# 79273221

08/17/2023 ORDER

ORDER GRANTING PLAINTIFF'S TRADITIONAL MOTION FOR SUMMARY JUDGEMENT ENV# 79273221

08/29/2023 DOCKET NOTE

CK #3033 TO CHRISTEL CHANTEL WALLING - SENT TO SDU

08/28/2023 SERVICE - SHERIFF - WRIT

08/28/2023 ISSUE WRIT 08/28/2023 ISSUE WRIT

WRIT OF POSSESSION OF PREMISES-ISSUED TO VZSO FOR SERVICE

08/31/2023 RECEIPT ISSUED

CAUSE OF ACTION: TRESPASS TO TRY TITLE

FILE DATE: 08/24/2022

DATE NATURE OF PROCEEDINGS

220667

09/05/2023 LETTER LETTER FROM UDO BIRNBAUM

09/06/2023 NOTICE OF APPEAL

NOTICE OF APPEAL

09/06/2023 MOTION (NO FEE)

MOTION FOR RECUSAL

09/06/2023 MOTION (NO FEE)

EMERGENCY MOTION TO STAY WRIT OF POSSESSION

09/06/2023 DOCKET NOTE

LINES 71-73 TAKENT TO W. BARKER FOR REVIEW

09/06/2023 NOTICE OF COURT ORDER

NOTICE OF COURT ODER- ORDER GRANTING PLAINTIFF'S TRADITIONAL MOTION FOR SUMMARY

JUDGMENT ENV# 79273221

09/06/2023 NOTICE OF COURT ORDER

NOTICE OF COURT ORDER -ORDER DENYING DEFENANT'F MOTION FOR MEDIATION ENV# 79273221

09/20/2023 NOTICE OF APPEAL

CIVIL CERTIFICATE AND NOTICE OF APPEAL AND CIVIL CERTIFICATE SENT TO 12TH COURT OF

APPEALS TRACE #14550

09/13/2023 NOTICE

NOTICE FROM 12TH COURT OF APPEALS

09/13/2023 AMENDED FILING

FIRST AMENDED EMERGENCY MOTION TO STAY WRIT OF POSSESSION/("EVICTION")

09/13/2023 AMENDED FILING

ADDENDUM TO FIRST AMENDED EMERGENCY MOTION TO STAY WRIT OF POSSESSION/("EVICTION")

09/13/2023 AMENDED FILING

FIRST AMENDED ADDENDUM TO FIRST AMENDED EMERGENCY MOTION TO STAY WRIT OF

POSSESSION/("EVICTION")

09/13/2023 AMENDED FILING

FIRST AMENDED MOTION FOR RECUSAL OF HON. JUDGE CHRIS MARTIN

09/13/2023 DOCKET NOTE

LINES 77-80 TAKEN DOWN TO PT FOR REVIEW

09/08/2023 REQUEST

REQUEST FOR ASSIGNMENT

09/08/2023 ORDER

ORDER OF REFERRAL ON MOTION TO RECUSE ENV# 79596705

09/15/2023 NOTICE

NOTICE OF COURT SETTING

09/15/2023 ORDER

ORDER OF ASSIGNMENT BY THE PRESIDING JUDGE EVN# 79623809

09/18/2023 ANSWER/CONTEST/RESPONSE/WAIVER-FAM

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR RECUSAL

09/18/2023 PROPOSED ORDER

PROPOSED *ORDER DENYING DEFENDANT'S MOTION FOR RECUSAL

09/19/2023 ORDER

ORDER DENYING MOTION TO RECUSE

09/19/2023 NOTICE OF COURT ORDER

NOTICE OF COURT ORDER ENV# 79725386

CAUSE OF ACTION: TRESPASS TO TRY TITLE

FILE DATE: 08/24/2022

DATE NATURE OF PROCEEDINGS

09/20/2023 JUDGMENT FINAL JUDGMENT ENV# 79782794 09/20/2023 ORDER

ORDER DENYING DEFENDANT'S EMERGENCY MOTIONS TO STAY WRIT OF POSSESSION ENV# 79782794

09/21/2023 NOTICE OF COURT ORDER

NOTICE OF COURT ORDER ENV# 79782794

09/21/2023 NOTICE OF COURT ORDER

NOTICE OF COURT ORDER ENV# 79782794

10/02/2023 NOTICE

NOTICE FROM 12TH COURT OF APPEA; S

10/02/2023 MEMORANDUM OPINION

MEMORANDUM OPINION

10/02/2023 JUDGMENT JUDGMENT 12TH COURT OF APPEALS

10/03/2023 RETURN OF WRIT

WRIT OF POSSESSION OF PREMISES-EXECUTED 9-21-23

10/05/2023 LETTER

LETTER TO CLERK

10/05/2023 FINDINGS OF FACT AND CONCLUSION OF LAW

REQUEST FOR FINDINGS OF FACT AND CONCLUSTIONS OF LAW

10/05/2023 MOTION FOR NEW TRIAL

MOTION FOR NEW TRIAL BECAUSE THERE WAS NEVER A FIRST

10/05/2023 MOTION (NO FEE)

MOTION TO MODIFY CORRECT AND REFORM THE JUDGMENT

10/05/2023 DOCKET NOTE

REQUEST OF FINDINGS OF FACT AND CONCLUSIONS OF LAW SENT TO JUDGE'S OFFICE BY EMAIL

10/12/2023 LETTER

LETTER

10/12/2023 NOTICE OF APPEAL

NOTICE OF APPEAL

10/12/2023 NOTICE OF APPEAL NOTICE OF APPEAL TO COURT REPORTER 10/12/2023 NOTICE OF APPEAL

CIVIL CERTIFICATE AND NOTICE OF APPEAL SENT TO 12TH COURT OF APPEALS TRACE # 14747

0/16/2023 MOTION (NO FEE)

MOTION FOR REHEARING AND MOTION FOR RECONSIDERATION OF DISMISSAL OF APPEAL -EMAILED

TO WB

10/25/2023 LETTER

LETTER

10/25/2023 NOTICE OF APPEAL

MOTION FOR REHEARING/DENIED

11/06/2023 FINDINGS OF FACT AND CONCLUSION OF LAW

NOTICE OF PAST DUE FINDINGS OF FACT AND CONCLUSIONS OF LAW-EMAILED TO JUDGES OFFICE

11/06/2023 NOTICE OF APPEAL

NOTICE OF APPEAL -EMAILED TO JUDGES OFFICE

11/06/2023 LETTER

LETTER -EMAILED TO JUDGES OFFICE

11/06/2023 NOTICE OF APPEAL

| DATE NATURE OF PROCEEDINGS CERTIFICATE AND NOTICE OF APPEAL SENT TO 12TH COURT OF APPEALS TRACE #14831 11/07/2023 NOTICE OF APPEAL AMENDED CIVIL CERTIFICATE WITH ADDITIONAL DOCUMENTS SENT TO THE 12TH COURT OF APPEALS TRACE #14840 11/08/2023 NOTICE NOTICE FROM 12TH COURT OF APPEALS DEFECTIVE NOA 11/15/2023 LETTER LETTER TO CLERK 11/15/2023 NOTICE OF APPEAL NOTICE OF APPEAL TO THE COURT REPORTER 11/16/2023 NOTICE OF APPEAL 2ND AMENDED CIVIL CERTIFICATE SENT TO 12TH COURT OF APPEALS TRACE #14877 11/20/2023 NOTICE NOTICE FROM 12TH COURT OF APPEALS | CAUSE OF ACTION: TRESPASS TO TRY | TITLE |
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