

CAUSE NO. 22-00105

CSD VAN ZANDT LLC
Plaintiff

§ IN THE DISTRICT COURT

v.

§ 294TH JUDICIAL DISTRICT

UDO BIRNBAUM
Defendant

§ VAN ZANDT COUNTY, TX

**DEFENDANT’S RESPONSE TO FIRST SET
OF INTERROGATORIES TO UDO BIRNBAUM**

1. Please detail and explain the circumstances that led to the conveyance of the Subject Property to Gwendolyn Wright Thibodeaux on April 12, 2002 as shown in the Warranty Deed filed at Volume 1710, Page 590 of the Official Public Records of Van Zandt County, Texas.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as “the circumstances” is not defined.

2. Please detail and explain the circumstances that led to the attempted conveyance of the Subject Property to You from Louis Thibodeaux on or around April 3, 2017.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as “the circumstances” is not defined.

3. Please detail and explain the factual and legal theories that support Your contention that You own the Subject Property.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as “contention” is not defined.

4. Please detail and explain the factual and legal theories that support Your contention that You have suffered damages in the amount of \$850,000.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as “contention” is not defined.

5. Please identify, with name, address, and contact information, the following individuals/entities below, as referenced in Defendant's Answer and Counterclaim:

- a. The Grantor;
- b. The Grantee;
- c. In-between facilitators; and
- d. Useful idiots.

RESPONSE: Defendant objects to the foregoing interrogatory by reason of inquiry into a long ago by now moot document.

6. Please detail and explain the basis of Your contention that the Subject Property was fraudulently stolen from You, as stated in Your Response in Opposition to this Court's Setting for Hearing by Submission of Plaintiff's MSJ for Nov. 14, 2022.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as "contention" is not defined.

7. Please detail and explain the basis of Your contention that "statute of limitation claim preclusion" allegedly bars Plaintiff's claims in the instant suit, as stated in Defendant's First Amended Answer, Counter, Cross, Trespass to Try Title, Injunction, Law Licenses, Criminal Refer.

RESPONSE: Defendant objects to the foregoing interrogatory as vague and unclear, as "contention" is not defined.

UDO BIRNBAUM, *Pro Se*
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Eustace, TX 75124
903 802-9669
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Certificate of Service

Today May 22, 2023, by Regular Mail to Katryna R. Watkins, Flowers Davis, 1021 ESE Loop 323, Suite 200, Tyler, Texas 75701