

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 PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION TO DEFENDANT**

1. Please produce any and all, deeds, affidavits, plats, maps, surveys, appraisals, leases, correspondence, and/or documents that You contend reflects your alleged ownership of the Subject Property.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

2. Please produce all correspondence between You and Lisa Girot from April 2002-Present that relates to or concerns the Subject Property.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

3. Please produce all correspondence between You and Louis Thibodeaux from January 2002-Present that relates to or concerns the Subject Property.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

4. Please produce all correspondence between You and Gwendolyn Wright Thibodeaux from January 2002-Present that relates to or concerns the Subject Property.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

5. Please produce all tax documents, including but not limited to, tax certificates, tax reports, tax statements and payments receipts that pertain to the Subject Property from January 2001-Present.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

6. Please produce any and all documents You intend to offer as evidence at trial.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

7. Please produce any and all evidence to support Your contention that You have suffered \$850,000.00 in damages.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

8. Please produce any and all evidence to support Your contention that the Subject Property was fraudulently stolen from You.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

9. Please produce any and all photographs of the Subject Property and /or dwellings located on same.

RESPONSE: Defendant objects to this request as being overly broad and untimely. See *Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

UDO BIRNBAUM, *Pro Se*
540 VZ County Road 2916
Eustace, TX 75124
903 802-9669
BRNBM@AOL.COM

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