

No. _____

UDO BIRNBAUM	\$	IN THE COUNTY COURT
Plaintiff		
v.	\$	
ROBERT DOW	\$	VAN ZANDT COUNTY, TX
Defendant		

ORIGINAL PETITION

The Parties

Plaintiff **UDO BIRNBAUM** (“Birnbaum”) resides on his 150 acre farm at 540 VZ County Road 2916, Eustace, Texas 75124, and may be served there or contacted email BRNBM@AOL.COM, else telephone 903 802-9669, no voice mail.

Defendant **ROBERT O. DOW** (“Dow”), is a land developer who may be served at 6115 Owens Ste 201, Dallas, TX 75235, or through any of his lawyers Corey Kellam, Celia C. Flowers, Katryna R. Watkins, or Tucker B. Royall, all at Flowers Davis at 1021 ESE Loop 323, Suite 200, Tyler, Texas 75701, (903) 534-8063, or wherever.

Damages

On or about July 19, 2022, **ROBERT O. DOW** trespassed upon **UDO BIRNBAUM** property by skid steer bulldozer and did destroy and tear out and roll up 3000 feet of internal fences and gates into ugly piles despite Birnbaum continual attempts to have law enforcement stop Dow.

Additional damage was to pasture and roots of trees because of the extreme drought, Dow running off pasture lessee, expenses and trouble to both me and my neighbor lessee, including repeated cutting by Dow of locks and No Trespass signs, emotional distress, and interference with happiness and social intercourse.

Prayer

I, UDO BIRNBAUM, seek damages of \$250,000 to this 86 year old by reason of ROBERT O. DOW conduct.

Attach: Dow skid steer bulldozer, Dow ugly pile, ‘battle at the gate’

UDO BIRNBAUM
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Eustace, TX 75124
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