

CITATION

THE STATE OF TEXAS
COUNTY OF TARRANT

TO: Stuart W Gentling
902 Boland
Ft Worth Texas 76107

THE DOLLAR AMOUNT SHOWN ON THIS CITATION IS NOT
THE TOTAL AMOUNT DUE. FOR A PAYOFF FIGURE OF
THE TOTAL AMOUNT DUE EACH PLAINTIFF CALL:
TARRANT COUNTY TAX OFFICE - 334-1051
CITY OF FORT WORTH - 870-6655 OR 870-6677

E87780-

E87630

GREETING:

YOU ARE HEREBY COMMANDED to appear and answer, by filing a written answer, before the Honorable District Court, 236TH Judicial District, Tarrant County, Texas, at the Courthouse of said county in Fort Worth, Texas, at or before 10:00 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service of this Citation, then and there to answer the Petition of the State of Texas, County of Tarrant, et al, Plaintiff, filed in the said District Court on MAR 09 1987 against STUART W GENTLING, ET AL, DEFENDANT, said suit being number E87630 on the docket of said Court, the nature of which demand is a suit to collect delinquent ad valorem taxes on the property hereinafter described.

The amount of taxes due Plaintiff, exclusive of interest, penalties, and costs, is the sum of \$454.12, said property being described as VAN ZANDT HILLSIDE, BLK 6 LOT 1, N40'1-2 BLK 6.

The names of all taxing units which assess and collect taxes on said property not made parties to this suit, are:

Plaintiff and all other taxing units who may set up their tax claims herein seek recovery of delinquent ad valorem taxes on the property hereinabove described, and in addition to the taxes all interest, penalties, and costs allowed by law thereon up to and including the day of judgment herein, and the establishment and foreclosure of liens securing the payment of same, as provided by law.

All parties to this suit, including Plaintiff, Defendants, and Intervenor, shall take notice that claims not only for any taxes which were delinquent on said property at the time this suit was filed but all taxes becoming delinquent thereon at any time thereafter up to the day of judgment, including all interest, penalties, and costs allowed by law thereon, may upon request therefor, be recovered herein without further citation or notice to any parties herein, and all said parties shall take notice of and plead and answer to all claims and pleadings now on file and which may hereafter be filed in this cause by all other parties hereto, and by all of those taxing units above referred to, who may intervene herein and set up their respective tax claims against said property.

If this citation is not served within 90 days after the date of its issuance, it shall be returned unserved.

The Officer executing this return shall promptly serve the same according to the requirements of law and the mandates hereof and make due return as the law directs.

Issued and given under my hand and seal of said Court at Fort Worth, Texas, this the 25th day of March, A.D., 1987

Heard, Goggan, Blair, Williams & Harrison
603 East Belknap
Fort Worth, Texas 76102

Thomas P. Hughes
Clerk of the District Courts
of Tarrant County, Texas

ATTORNEY FOR PLAINTIFF

BY: Doyle E. , Deputy.

OFFICER'S RETURN

Received the attached Citation on the day of , 1987. Executed at Fort Worth, within the County of Tarrant, State of Texas, on the day of , 1987, by mailing by certified mail, with delivery restricted to addressee, a true copy of Plaintiff's Original Petition, having first endorsed thereon the date of mailing. The return receipt with the signature thereon of the within named is attached.

THOMAS P. HUGHES
CLERK OF THE DISTRICT COURTS
OF TARRANT COUNTY, TEXAS

By: , Deputy

E97630
NO. E87780

STATE OF TEXAS,
COUNTY OF TARRANT, ET AL

IN THE DISTRICT COURT

VS.

236TH JUDICIAL DISTRICT

STUART W GENTLING, ET AL

TARRANT COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME the State of Texas, County of Tarrant, in its own behalf, and on behalf of other political subdivisions whose taxes are collected by the Tarrant County Tax Collector, the City of Fort Worth, and the Fort Worth Independent School District, hereinafter called Plaintiffs, and file this Original Petition in the above styled and numbered cause, and for cause of action would show the Court as follows:

I.

Defendants and the persons or entities through which service may be obtained are as follows: Stuart W Gentling, 902 Boland, Ft Worth Texas 76107, (B1 7262 192 WD); Central Bank & Trust, By Serving Pres, VP or Reg Agent, 777 W Rosedale, Ft Worth Texas 76101, (C1 7262 196 DT); Camp Bowie National Bank, By Serving Pres, VP or Reg Agent, 3859 Camp Bowie, Ft Worth Texas 76107, (C2 8494 1458 DT); and all persons owning, having, or claiming any interest or lien in the property described in this Petition, as well as the unknown heirs and legal representatives of all defendants.

II.

All other taxing units assessing and collecting taxes on said property are and shall be included in this suit and shall be invited to add their claims.

III.

As to each separately described property, there are delinquent taxes, penalties, interest, and costs, justly due, owing, and unpaid against the property described in Exhibit "A", which is attached hereto and made a part hereof by reference for all purposes, for the years and in the amounts therein set forth.

IV.

All the parties to this suit, including Plaintiffs, Defendants, and Intervenor, shall take notice that claims for any and all taxes becoming delinquent on said property at any time subsequent to the filing of this suit, up to the day of judgment, are incorporated in this suit, and upon request therefor shall be recovered herein without further citation or notice, and that such claims for such delinquent taxes shall include all penalties, interest, and costs allowed by law.

V.

All of these taxes were authorized by law, and each political subdivision in whose behalf this suit is brought was legally constituted and authorized to impose and collect ad valorem taxes on property. All of these taxes, in a stated amount, were legally imposed on each separately described property for each year specified and on each person named if known who owned the property on January 1 of the year for which the tax was imposed. Plaintiffs now have and assert a lien on each tract of real property and each item of personal property described and mentioned herein to secure the payment of all taxes, penalties, interest, and costs due thereon. All things required by law to be done have been done properly by the appropriate officials.

FILED
TARRANT COUNTY
MAR -9 3:09
HOUSTON
DISTRICT CLERK

VI.

All of the real and personal property described in Exhibit "A" was, at the time the taxes were assessed, located within the boundaries of the plaintiffs and of the county and each political subdivision in whose behalf this suit is brought. The persons sued owned the property at the time of the filing of this suit.

VII.

The Law Firm whose name is signed hereto is legally authorized and empowered to institute and prosecute this action on behalf of plaintiffs. Reasonable attorney's fees should be awarded in favor of the plaintiffs for the prosecution of this case, and such attorney's fees should be taxed as costs.

VIII.

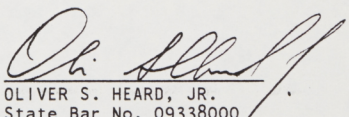
Plaintiffs may have incurred certain expenses in procuring data and information as to the name, identity, and location of necessary parties and in procuring necessary legal descriptions of the property. Said expenses, if incurred, are reasonable and are shown in Exhibit "A" as abstractor's costs, which expenses should be taxed as costs herein.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs ask that the Sheriff of Tarrant County and his lawfully empowered deputies be directed to serve legal process upon the person of the Defendants citing and commanding them to appear and answer herein in the time and in the manner required by law, and that on final trial herein they do have and recover of and from the defendants judgment for the total amount of said taxes, and all additional taxes which may come due during the pendency of this action. Plaintiffs also pray for judgment for all penalties and interest lawfully due or which may become due, as well as for reasonable attorney's fees. Plaintiffs pray for foreclosure of the tax lien on the specific property of the defendants described herein with a consequent order for tax sale requiring such property to be sold at public auction in the manner prescribed by law. Plaintiffs pray for personal judgment jointly and severally against the defendants, and for the imposition and collection of a lien on all other assets, real or personal owned by the defendants. Plaintiffs ask for the appropriate writs of execution directing the Sheriffs and Constables of the State of Texas to search out, seize and sell sufficient property of the defendants to satisfy the lawful judgment sought herein. Plaintiffs pray for costs of court and for such other and further relief, at law or in equity, to which they may show themselves justly entitled.

Respectfully submitted,

HEARD, GOGGAN, BLAIR, WILLIAMS & HARRISON
603 East Belknap
Fort Worth, Texas 76102
(817) 877-4589

By: 

OLIVER S. HEARD, JR.
State Bar No. 09338000
Attorney for Plaintiff

EXHIBIT "A"

000003252221

~~E87780~~

E87630

STUART W GENTLING
4801 HARLEY AVE
FORT WORTH

9-86
TX

76107

VAN ZANDT HILLSIDE
BLK 6 LOT 1
N40'1-2 BLK 6

LEGAL DESCRIPTION OF PROPERTY:

VAN ZANDT HILLSIDE BLOCK 6 NORTH 40 FEET LOTS 1 AND 2 SITUATED IN TARRANT COUNTY, TEXAS, AS SHOWN BY A DEED OF RECORD IN VOLUME 7262 PAGE 192 OF THE DEED RECORDS OF TARRANT COUNTY, TEXAS.

ABSTRACTOR'S FEE: \$75.00 (PTR)

D E L I N Q U E N T T A X S T A T E M E N T

STATE OF TEXAS, COUNTY OF TARRANT

44510-6-1-10

YEAR	TAX AMT	P & I	TOTAL
1985	73.43	32.14	105.57
TOTAL	73.43	32.14	105.57

CITY OF FORT WORTH AND FORT WORTH I.S.D.

000003252221

YEAR	TAX AMT	P & I	TOTAL
1985	380.69	166.58	547.27
TOTAL	380.69	166.58	547.27

TOTAL DUE AS OF FEBRUARY, 1987

TOTAL	454.12	198.72	652.84
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This suit covers all delinquent taxes owed on this property, whether or not itemized herein for all years. Penalty and interest continue to accrue monthly at 1%.

County taxes -