

C I T A T I O N
T H E S T A T E O F T E X A S
CAUSE NO. D-1-GN-19-006394

TRAVIS CENTRAL APPRAISAL DISTRICT, BY AND THROUGH MARYA CRIGLER ACTING IN HER OFFICIAL CAPACITY AS CHIEF APPRAISER OF TRAVIS CENTRAL APPRAISAL DISTRICT, , Plaintiff

vs.
TEXAS DISPOSAL SYSTEMS LANDFILL, INC. , Defendant

TO: TEXAS DISPOSAL SYSTEMS LANDFILL INC
BY SERVING BOB GREGORY
12200 CARL ROAD
BUDA, TEXAS 78610

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND REQUEST FOR PRODUCTION of the PLAINTIFF in the above styled and numbered cause, which was filed on SEPTEMBER 20, 2019 in the 200TH JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, October 01, 2019

REQUESTED BY:
MARY SANCHEZ
6101 SHERIDAN AVENUE
AUSTIN, TX 78723
BUSINESS PHONE: (512) 323-0797 FAX: (512) 532-6598



[Signature]
Valva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: MELISSA ROMERO

R E T U R N

Came to hand on the _____ day of _____, _____ at _____ o'clock _____ M., and executed at _____ within the County of _____ on the _____ day of _____, _____, at _____ o'clock _____ M., by delivering to the within named _____, each in person, a true copy of this citation together with the PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND REQUEST FOR PRODUCTION accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ _____

Sworn to and subscribed before me this the _____ day of _____, _____.

Carlos B. Lopez
Constable Pct. 5, Travis County, Texas
Sheriff / Constable / Authorized Person

By: _____

Printed Name of Server _____

Notary Public, THE STATE OF TEXAS

D-1-GN-19-006394

CONSTABLE

P01 - 000083666

☒ Original ☐ Service Copy

4TH
DELIVERED THIS _____ DAY OF Oct 20 19
CARLOS B. LOPEZ
CONSTABLE PCT. 5, TRAVIS COUNTY, TEXAS
BY: *[Signature]*
DEPT. 520

Velva L. Price
District Clerk
Travis County
D-1-GN-19-006394
Victoria Benavides

CAUSE NO. D-1-GN-19-006394

TRAVIS CENTRAL APPRAISAL	§	IN THE DISTRICT COURT
DISTRICT, By and through Marya Crigler,	§	
Acting in Her Official Capacity as	§	
Chief Appraiser of Travis Central	§	
Appraisal District,	§	
Plaintiff	§	200TH
	§	JUDICIAL DISTRICT
v.	§	
	§	
TEXAS DISPOSAL SYSTEMS	§	
LANDFILL, INC.	§	
Defendant	§	TRAVIS COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION, REQUEST FOR DISCLOSURE
AND REQUEST FOR PRODUCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES TRAVIS CENTRAL APPRAISAL DISTRICT, by and through Marya Crigler, acting in her Official Capacity as Chief Appraiser of Travis Central Appraisal District, "PLAINTIFF" in the above styled and numbered cause, and complains against TEXAS DISPOSAL SYSTEMS LANDFILL, INC., "DEFENDANT", and shows unto the Honorable Court as follows:

**I.
DISCOVERY AND TRIAL SETTING**

1. Pursuant to TRCP 190.4, discovery is to be conducted under Level 3 and pursuant to a Scheduling Order. PLAINTIFF herewith moves for such a Scheduling and Docket Control Order.

**II.
PARTIES**

2. PLAINTIFF is a governmental entity and political subdivision of the State of Texas, created and existing pursuant to TEX. TAX CODE § 6.01.

3. DEFENDANT, TEXAS DISPOSAL SYSTEMS LANDFILL, INC., is a Texas Corporation, which is shown on the appraisal rolls of the Travis Central Appraisal District as the owner of real property located within the boundaries of the Travis Central Appraisal District.

4. All service herein is to be accomplished by delivering true copies of the citation, together with a copy of Plaintiff's Original Petition, via personal service, addressed to the DEFENDANT as hereinafter detailed.

5. DEFENDANT, TEXAS DISPOSAL SYSTEMS LANDFILL, INC., is a Texas Corporation that may be served by personal service by serving the registered agent: Bob E. Gregory, 12200 Carl Rd., Buda, Texas 78610.

III. CONDITIONS PRECEDENT

6. All conditions precedent to the filing of this action have been performed or have occurred.

IV. JURISDICTION AND VENUE

7. This Court has jurisdiction over the parties and subject matter of this suit pursuant to TEX. TAX CODE §§ 42.02 and 42.21, as well as other applicable law.

8. Venue is proper in Travis County, Texas pursuant to TEX. TAX CODE § 42.22 because the Appraisal Review Board from whom the order is appealed is located in said county.

V. FACTS

9. After receiving the 2019 notice of the appraised value of the property subject of this suit, DEFENDANT filed a Protest with the Travis Appraisal Review Board, ("ARB"), pursuant to TEX. TAX CODE §41.41. After notice was provided to the PLAINTIFF and the DEFENDANT by the ARB, a hearing was held on DEFENDANT'S Protest. At the hearing,

evidence and argument were presented by the PLAINTIFF and the DEFENDANT. The ARB made determinations of the value of the property that is the subject of this suit. After making this determination, the ARB issued its Order determining the Protest which resulted in a value of the subject property that is below the correct appraised value.

Within fifteen days of the notice required by TEX. TAX CODE §41.47 that an ARB determination had been made, PLAINTIFF, by and through the Chief Appraiser of Travis Central Appraisal District, filed a written notice of appeal with the ARB, as required by TEX. TAX CODE §42.06(a). Within ten days of filing that notice, the Chief Appraiser delivered a copy of the notice to the property owner(s) or property owner's tax agent of record, as required by TEX. TAX CODE §42.06(c), via certified mail, return receipt requested. Notice was mailed to the last known address for the property owner(s) or property owner's tax agent of record and was delivered according to the terms of TEX. TAX CODE § 1.07(a). Within 60 days of the notice of the ARB hearing determination, PLAINTIFF, the Chief Appraiser of Travis Central Appraisal District, sought and obtained written approval of Travis Central Appraisal District's Board of Directors to appeal as required under TEX. TAX CODE § 42.02. The Travis Central Appraisal District's Board of Directors approved the Travis Central Appraisal District's request to appeal. Within a 60-day period, the Chief Appraiser filed this suit in district court, pursuant to TEX. TAX CODE §42.21(a).

VI. CAUSE OF ACTION

10. Pursuant to TEX. TAX CODE §§ 42.02 and 42.21, PLAINTIFF appeals the order of the Appraisal Review Board (hereinafter "ARB") regarding Tax Year 2019.

11. The Travis Central Appraisal District Property ID Number and corresponding address of the subject property is:

Property ID Number (PID)
352532

Location
3306 FM 1327

12. The market value of DEFENDANT'S property is greater than the determination of the ARB and the value set by the ARB results in unequal appraisal of the subject property. The ARB's value determination was arbitrary, erroneous, unjust, and unlawful and violated the requirements of TEX. TAX CODE §§ 1.04(7) and 23.01. The result of the ARB's determination is an appraisal of the subject property below market value and unequal appraised value.

VII. **REQUEST FOR DISCLOSURE**

Pursuant to Rule 194, Texas Rules of Civil Procedure, you are requested to disclose within 30 days of service of this request, the information or material described in Rule 194.2 (a), (b), (c), (d), (e), (f), (g), (h), (i), (j), (k) and (l).

VIII. **REQUESTS FOR PRODUCTION OF DOCUMENTS**

DEFINITIONS

1. "You" or "yours" means the person to whom these Requests are directed, as well as the title owner, a lessee under Texas Tax Code § 42.015, all agents, employees, attorneys, representatives, directors, trustees, natural persons, business entities, governmental bodies or agencies, or other legal entities acting or purporting to act on your behalf.

2. "Documents" means any written or graphic matter, however produced or reproduced, and includes the original writing and any copy thereof, whether the copy is identical to the original or non-identical (whether by reason of marginal or other notes or alteration of any kind). The term "document" or "documents" includes, but is not limited to, any written, printed, recorded, or reported information in the form of memoranda, letters, correspondence, appraisals, notes, books, minutes, papers, records, accounts, writings, diaries, newspaper or periodical articles or columns, studies, surveys, reports, pamphlets, calendars, drawings, graphs, sketches, charts, photographs or their negatives, bulletins, circulars, instructions, notebooks, books of account, appointment books or records, schedules, treatises, manuals, contracts, agreements, tapes, sound recordings, films, film or videotape recordings, blueprints, plots, architectural or engineering drawings or renderings or sketches or diagrams, drafts, worksheets, computer tapes/discs/printouts, microfiche or microfilm, estimates, opinions, catalogues, plans, logs, summaries, cards or any other writing or record that is in your possession, custody, or control, or that you know to exist. A document is

considered to be in your possession, custody, or control if you have either physical possession of it or a superior right to compel its production from a third party.

3. "Identify" (a) when referring to a natural person or a business, governmental, or other legal entity means to state his, her, or its full name, current job title and nature of employment, present or last known address and telephone number and, if the name is unknown, then to state a reasonably detailed description of the identified party; (b) when referring to a document means to state its date, author, type or character (i.e., letter, contract, etc.), a reasonably detailed description of its contents, and the full name and present or last known address of its current custodian; (c) when referring to a document which is not in your possession, custody, or control, or is no longer in existence means to state whether the document is missing, lost, or destroyed, or if it was transmitted or transferred (voluntarily or involuntarily) to another person or entity and, if so, to identify that person or entity as previously directed. In lieu of identifying existing documents, you may attach to your answers true and complete copies of the documents.

4. "Market value" means the price at which a referenced property would transfer, on January 1 of the year(s) referenced in Plaintiff's Original Petition and about which the case was filed, for cash or its equivalent under prevailing market conditions if: (i) exposed for sale in the open market with a reasonable time for the seller to find a purchaser; (ii) both the seller and purchaser know of all the uses and purposes to which the property is adapted or for which it is capable of being used and of the enforceable restrictions on its use; and (iii) both the seller and purchaser seek to maximize their gains and neither is in a position to take advantage of the exigencies of the other.

5. "Person" means natural person, sole proprietorship, joint venture, partnership, association, corporation, government agency, or any other legal entity as well as his, her, or its agents, representatives, or employees.

6. "Property" means the property—or properties—that is/are is the subject of this litigation and is described more fully in Plaintiff's Original Petition, or in any supplemental or amended petitions that are filed thereafter.

7. "Tax Year" means the year that the property is the subject of this litigation and is described more fully in Plaintiff's Original Petition, or in any supplemental or amended petitions that are filed thereafter.

DOCUMENTS REQUESTED

The following documents are to be produced or, if not in Defendant's possession, custody, or control, identified:

1. Copies of the following documents concerning the property:
 - a. purchase or sales contract;
 - b. construction contract;
 - c. costs of construction, if applicable, including but not limited to AIA Draw Schedules;

- d. costs of repairs, rehabilitations, or renovations to the property for the tax year(s) and the two calendar years preceding the tax year(s);
 - e. closing statement concerning the Defendant's purchase of the property;
 - f. sales documents for any sale of the property from three years prior to the first tax year in suit until the present.
2. Any and all documents pertaining to loan applications and refinance applications, including but not limited to appraisal reports and/or value estimates, made by you or prepared on your behalf related to the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit. To the extent the document is not in your possession, identify the document and the name and address of the person who has possession of that document.
3. Documents in your possession detailing the income and expenses associated with operating the property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit. This request includes such documents as income and expense statements, asset(s) listings, and other documents commonly prepared by accountants and bookkeepers for a business.
4. Documents that set forth or contain any information related to the operation of the property as a rental or lease property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit, including but not limited to the documents that show rental revenues, rental rolls, occupancy levels, operating statements, tenant concessions and expenses of operating the property.
5. Any and all leases for tenants occupying the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
6. Any document from any source, except from the Travis Central Appraisal District, stating an opinion of value for the property for the tax year(s) that is/are the subject of this lawsuit.
7. Documents which show the calculation of the value of the property for the tax year(s) that is/are subject of this lawsuit based on the income approach to value, including but not limited to those documents demonstrating how the capitalization rate was determined, all discounted cash flow analysis, all direct capitalization calculations, and all assumption reports underlying the discounted cash flows.
8. Documents which show the calculation of value of the property for the tax year(s) that is/are the subject of this lawsuit based on the market data sales comparison approach, including but not limited to any and all comparable sales.
9. Documents which show the calculation of value of the property for the tax year(s) that is/are the subject of this lawsuit based on the cost method of appraisal.
10. Any documents, not previously provided, supporting your claim that the property was excessively appraised according to the provisions of § 42.25, Texas Tax Code, for the tax year(s) that is/are subject of this lawsuit.

11. Any documents, not previously provided, supporting your claim that the property was appraised unequally according to the provisions of § 42.26, Texas Tax Code, for the tax year(s) that is/are subject of this lawsuit.
12. Any and all Securities and Exchange Commission disclosures and reports pertaining to the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
13. Any and all insurance policies that existed as of Jan. 1 of each tax year in dispute that identify a value (in whole or in part) of the subject property.
14. Each and every Federal Income Tax Return, filed by you or a related corporation, partnership or other entity that reflects the profit or loss from the operations on the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
15. Each and every State of Texas sales tax statement or like return which was filed regarding any income produced on the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
16. All documents and/or tangible things, relating, and/or referring to any and all factual observations, tests, reports, supporting data, calculations, photographs, physical models (to scale or otherwise), or inspection and/or opinions of any consulting expert, Plaintiff, or person representing Plaintiff whose work was reviewed by a testifying expert in preparation of the testifying expert's work in this lawsuit, (regardless of when the factual information was acquired). If the above information has not been recorded and reduced to a tangible form, Defendant(s) hereby requests that these matters be reduced to a tangible form and produced.
17. Any cash flow projection – including, but not limited to, “Argus” reports or projections – for the property (or any portion thereof) made the basis of this suit for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
18. Any and all tests, photographs, charts, drawings, studies, maps, surveys, blueprints, architectural drawings, floor plans or any other exhibits, data, or data compilations regarding the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
19. Any and all documents which reflect or evidence your ownership of or interest in the subject real property or business, and any other person's interest therein, including but not limited to any burdens on the ownership, including notes, deeds of trust, mortgages, pledges, or other dealings of a financial nature which relate to or affect the subject real property.

20. Any and all estimates received by you regarding repair or renovation costs for conditions you claim affect market value for the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
21. Every accounting report, financial statement, operating statements, and profit/loss statements, whether in preliminary or final form, made by or delivered to you for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit and which concerns the subject property.
22. Any and all listing agreements, offers to buy, letters of intent or any offers to purchase and/or sell the subject property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit.
23. Any and all partnership agreements, corporate agreements, or business agreements pertaining to the ownership of the property for the tax year in issue.
24. Any appraisal, investment analysis, or other value estimate of the property for the tax year and the two calendar years preceding the tax year(s) that is/are the subject of this lawsuit, which is in your possession or control that has not been previously produced in response to these requests or if not in your possession or control, please identify the documents and who is in possession or control of the documents.
25. Any and all documents reflecting operating expenses for the property at year-end for two (2) years prior to tax year(s) in dispute.
26. Any and all documents reflecting a list of capital expenditures and/or improvements completed for the property for two (2) years prior to tax year(s) in dispute.
27. Any and all documents reflecting capital expenditure budgets for one (1) year prior to tax year and as of January 1 of the tax year in dispute for each property.
28. The most recent title policy or title commitment for each property.
29. Any surveys and/or site plans of the property and/or any surveys of the property.
30. Copy of Defendant's original lease of the subject property and any amendments thereto, wherein Defendant is the Lessee.
31. All documents reflecting the terms, conditions and value of any sale or purchase of a similar or comparable property in which Defendant was a party in the three (3) calendar years preceding the tax year(s) in litigation or the tax year(s) in litigation.
32. Any and all documents required under section 42.30 of Texas Property Tax Code.
33. Any and all agreements for legal services related to this litigation.

34. All documents reflecting testimony and/or reports in Defendant's possession prepared by Defendant's experts.
35. Each request or order by any third party that an appraisal be made relating to the Property for each tax year at issue.
36. Please produce any and all documents showing the annual tonnage received for each tax year in litigation and the 3 years prior.
37. Please produce any and all documents showing the compaction ratio per year for the tax years in litigation.
38. Please produce any and all documents showing the tipping fee per ton each year for the tax years in litigation and the 3 years prior.
39. Please provide any and all documents showing leachate disposal figures for the tax years in litigation by year and the 3 years prior, listing each year separately. This information should include, but is not limited to:
 1. Total gallons disposed
 2. Cost of disposal
40. Please produce any and all documents showing cash flow estimates of future cash flow and detailed breakdown each year on revenue from "Citizen" disposal (residential households dropping off small loads), including but not limited to number of "citizen" drop offs and Dollars of revenue for each tax year in litigation.
41. Please produce any and all estimates of future cash flow and detailed breakdown each year on revenue from Commercial contracts (per ton fees) broken out for each contract, including but not limited to tons dropped off ("tipped") and Dollars in revenue.
42. For the tax years in litigation, please provide any and all documents showing the disposal rates charged by Defendant for various entities and/or individuals, including but not limited to the City of Austin or City of San Antonio.
43. Please provide a copy of any and all written agreements and/or contracts establishing the disposal rates between Defendant and various entities and/or individuals, including but not limited to the City of Austin or City of San Antonio, for the tax years in litigation.
44. Please provide any and all documents showing or reflecting revenue from the resale of residential drop-offs for the tax years in litigation.
45. Please provide any and all documents showing or reflecting revenue from the operation of the wildlife park for the tax years in litigation.
46. Please provide any and all documents showing or reflecting revenue from any other source not produced above for the tax years in litigation.

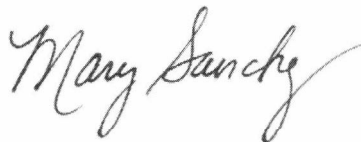
47. Please provide any and all documents showing or reflecting bulk discounts offered and/or calculations of bulk discounts for the tax years in litigation.
48. Please provide all documents supporting a special valuation under Chapter 23 of the Texas Property Tax Code for the tax years in litigation.
49. Please provide a copy of any government issued permit(s) related to the use or operation of the subject property for the tax years in litigation.
50. Please provide any and all written agreements or contracts for the services and/or operation of the subject property for the tax years in litigation.

IX. PRAYER

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF prays that DEFENDANT be cited to appear herein and after trial hereof that Judgment be entered against DEFENDANT, as pled hereinabove; that judgment be entered against DEFENDANT finding that the 2019 tax year's value of DEFENDANT'S property set by Order of the ARB is less than the correct appraised value of the property; that the 2019 tax year's value of DEFENDANT'S property set by the Order of the ARB resulted in unequal appraisal; that judgment be entered fixing the 2019 appraised value of the DEFENDANT'S property at no less than its market value, in accordance with the requirements of law and as authorized by TEX. TAX CODE § 42.24 (1); that the Court, pursuant to TEX. TAX CODE § 42.24 (3), enter such other orders necessary to preserve rights protected by and impose duties required by law; that all costs of suit, including but not limited to, those authorized by TEX. TAX CODE § 42.07 be charged against the DEFENDANT; that trial be decided by a jury; and for such other and further relief to which PLAINTIFF may show itself justly entitled.

Respectfully submitted,

EVERTSON & SANCHEZ, P.C.
c/o Travis Central Appraisal District
Attn: Legal Department
8314 Cross Park Dr.
Austin, Texas 78754
Telephone: (512) 834-9317
Facsimile: (512) 532-6598



By: _____
KAREN EVERTSON
State Bar No. 00797745
karen@texESlaw.com
MARY SANCHEZ
State Bar No. 17570830
mary@texESlaw.com

**ATTORNEYS FOR PLAINTIFF
TRAVIS CENTRAL APPRAISAL DISTRICT**

CIVIL CASE INFORMATION SHEET

MAY ENTER CAUSE # / COURT # IF ALREADY ASSIGNED (E.G., FAMILY MOTION, AMENDED PETITION)

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED Travis Central Appraisal District vs. Texas Disposal Systems Landfill, Inc.

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name:	Email:	Plaintiff(s)/Petitioner(s):	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address:	Telephone:	Travis Central Appraisal District	
6101 Sheridan Ave.	512-323-0797	Defendant(s)/Respondent(s):	Additional Parties in Child Support Case:
City/State/Zip:	Fax:	Texas Disposal Systems Landfill, Inc.	Custodial Parent:
Austin, TX 78723	512-323-5061		Non-Custodial Parent:
Signature:	State Bar No:	Attach additional page as necessary to list all parties]	Presumed Father:
	17570830		

2. Indicate case type, or identify the most important issue in the case (select only 1):

OPTION A: OK CASE TYPE (EXCEPT OTHER) FOR CLERK TO SELECT SUIT TYPE; SEE SEC. 3 NOTE BELOW		<i>Civil</i>	<i>Family Law</i>	
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract Foreclosure <input type="checkbox"/> Home Equity---Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <input type="checkbox"/> Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus---Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification---Custody <input type="checkbox"/> Modification---Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____		
Tax <input checked="" type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____		Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship---Adult <input type="checkbox"/> Guardianship---Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____		

3. Indicate procedure or remedy, if applicable (may select more than 1):

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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OPTION C: SECTION 3 PROCEDURES/REMEDIES IN **BOLD** MAY BE USED AS CASE OR SUIT TYPES. YOU MAY SPECIFY THAT ONE OF THESE PROCEDURES/REMEDIES BE USED AS A SUIT TYPE BY CHECKING IT AND LEAVING THE CASE TYPE IN SECTION 2 BLANK. SELECTING A CASE TYPE IN SECTION 2 OVERRIDES ANY SELECTION IN SECTION 3.



SERVICE REQUEST FORM

VELVA L. PRICE

District Clerk, Travis County
Civil Division (512) 854-9457

REQUESTED BY:

ATTORNEY/FILER: Mary Sanchez

PHONE #: 512-323-0797

EMAIL: Mary@travislaw.com

SUBMITTED BY:

TITLE: Attorney

SIGNATURE: *Mary Sanchez*

ISSUE PROCESS FOR:

CAUSE #:

CASE STYLE: Travis Central Appraisal District v. Texas Disposal Systems Landfill, Inc.

QUICK CITATION REQUEST: (FOR SERVICE OF CITATION ON ALL DEFENDANTS BY PERSONAL)

ISSUE CITATION TO ALL DEFENDANTS LISTED IN THE ORIGINAL PETITION AT THE ADDRESS SPECIFIED IN THE PETITION AND FORWARD THE CITATION(S) TO THE FOLLOWING:

☒ TRAVIS CO. CONSTABLE (specify):

☐ CERTIFIED MAIL BY CLERK ☐ ATTORNEY/REQUESTER

☐ PRIVATE PROCESS AGENCY (specify):

☒ I HAVE INCLUDED ATTACHMENTS TO THIS REQUEST (e.g. DISCOVERY) TO INCLUDE

DETAILED SERVICE REQUEST: (ON PARTICULAR PARTIES, BY VARIOUS DELIVERY METHODS, OR FOR NON-CITATION)

DESCRIPTION OF INSTRUMENT(S) TO BE SERVED: Plaintiff's Original Petition and Discovery Requests

☐ I HAVE INCLUDED ATTACHMENTS TO THIS REQUEST (e.g. discovery) TO INCLUDE IN THE CITATION

TYPE OF PROCESS TO
ISSUE: ☐ CITATION ☐ CERTIFIED NOTICE ☐ PROTECTIVE ORDER* ☐ TRO** ☐ INJUNCTION** ☐ SEQUESTRATION**
☐ ATTACHMENT* ☐ EXECUTION* ☐ ABSTRACT* ☐ SUPERSEDEAS* ☐ SCIRE FACIAS* ☐ OTHER*

*SPECIFY TITLE AND DATE OF UNDERLYING ORDER IN CASE RECORD:

**ATTACH A COPY OF BOND AND/OR OTHER SUPPORTING DOCUMENT

SERVICE TO BE ISSUED:

PARTY NAME: Texas Disposal Systems Landfill, Inc.

PARTY TYPE: Defendant

☒ USE ADDRESS IN ORIGINAL PETITION ☐ SECRETARY OF STATE

☐ OTHER ADDRESS:

PARTY NAME:

PARTY TYPE:

☐ USE ADDRESS IN ORIGINAL PETITION ☐ SECRETARY OF STATE

☐ OTHER ADDRESS:

PARTY NAME:

PARTY TYPE:

☐ USE ADDRESS IN ORIGINAL PETITION ☐ SECRETARY OF STATE

☐ OTHER ADDRESS:

EMAIL PROCESS TO:

☐ TRAVIS CO. CONSTABLE
☐ ATTORNEY/REQUESTOR
☐ PRIVATE PROCESS AGENCY:
Process Agency Name:

SERVE VIA:

☒ PERSONAL SERVICE
☐ CERTIFIED MAIL (BY CONSTABLE)
☐ CERTIFIED MAIL (BY CLERK)
☐ CITATION BY POSTING*
☐ CITATION BY PUBLICATION*

EMAIL PROCESS TO:

☐ TRAVIS CO. CONSTABLE
☐ ATTORNEY/REQUESTOR
☐ PRIVATE PROCESS AGENCY:
Process Agency Name:

SERVE VIA:

☐ PERSONAL SERVICE
☐ CERTIFIED MAIL (BY CONSTABLE)
☐ CERTIFIED MAIL (BY CLERK)
☐ CITATION BY POSTING*
☐ CITATION BY PUBLICATION*

EMAIL PROCESS TO:

☐ TRAVIS CO. CONSTABLE
☐ ATTORNEY/REQUESTOR
☐ PRIVATE PROCESS AGENCY:
Process Agency Name:

SERVE VIA:

☐ PERSONAL SERVICE
☐ CERTIFIED MAIL (BY CONSTABLE)
☐ CERTIFIED MAIL (BY CLERK)
☐ CITATION BY POSTING*
☐ CITATION BY PUBLICATION*

*THIS TYPE OF SERVICE MAY REQUIRE A COURT ORDER. ENTER DATE OF SERVICE ORDER IN CASE RECORD:

ADDITIONAL INSTRUCTIONS FOR CLERK OR FOR OFFICER SERVING PROCESS:

FOR ADDITIONAL PARTIES TO BE SERVED, USE e-FILED PROCESS ISSUANCE REQUEST FORM ADDENDUM

THE LAWYER REFERRAL SERVICE OF CENTRAL TEXAS

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