SUIT NO. TAX22891

GREENVILLE INDEPENDENT SCHOOL DISTRICT	**§**	**IN THE DISTRICT COURT**
	§	
VS.	**§**	**354TH JUDICIAL DISTRICT**
	§	
ESTATE OF W.M. GRAHAM	**§**	**HUNT COUNTY, TEXAS**

THE STATE OF TEXAS
HUNT COUNTY

CITATION BY POSTING

In the name and authority of the State of Texas
Notice is hereby given as follows:

To **Estate of Barbara Graham Bruce The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only)**, if living, and if any or all of the above named Defendant(s) be deceased, the unknown heirs of each or all of the said above named deceased persons; and the unknown owner or owners of the following described property; and the executors, administrators, guardians, legal representatives, devisees of the above named persons, unknown lienholders and any and all other persons, including adverse claimants, owning or having or claiming any legal or equitable interest in or lien upon the following described property delinquent to Plaintiffs herein, for taxes and/or miscellaneous liens to wit:

Account No. 71269; 3110 TRAVIS ST 75401, THE CITY OF GREENVILLE, HUNT COUNTY, TEXAS

The amount of taxes and other liens for Plaintiff(s) exclusive of interest, penalties and costs is: $2,827.96, payable to Hunt County (Hunt Memorial Hospital District $452.26 and Greenville Independent School District $2,375.70), on said property being described as S4385 ORIG TOWN OF GREENVILLE BLK 142 LOT 6 ACRES .1529 MORE OR LESS AND BEING MORE PARTICULARLY DESCRIBED IN THAT CERTAIN DEED OF RECORD IN VOLUME 438 PAGE 153 IN THE DEED RECORDS OF HUNT COUNTY, TEXAS..

You have been sued. You may employ an attorney. You are hereby commanded to appear and defend such suit on the first Monday after the expiration of forty-two (42) days from and after the date of issuance hereof. If you or your attorney do not file a written answer with the clerk who issued this citation, a judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby notified that suit has been brought by the Hunt County Tax Collector, GREENVILLE INDEPENDENT SCHOOL DISTRICT, hereinafter called Plaintiffs, against **Estate**

of W.M. Graham aka Wiley Maddox Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of W.M. Graham aka Wiley Maddox Graham (In Rem Only), Estate of Letha Graham aka Litha Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Letha Graham aka Litha Graham (In Rem Only), Estate of Russell B. Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Russell B. Graham (In Rem Only), Estate of Shirley Agatha Graham Erwin the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Shirley Agatha Graham Erwin (In Rem Only), Estate of Dan Graham aka Dan Burton Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Dan Graham aka Dan Burton Graham (In Rem Only), Estate of Nettie Lou Graham Harris the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Nettie Lou Graham Harris (In Rem Only), Estate of Barbara Sue Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Sue Erwin (In Rem Only), Estate of Gary Wayne Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Gary Wayne Erwin (In Rem Only), Estate of Robert Leo Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Robert Leo Erwin (In Rem Only), Estate of Steve Foster Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Steve Foster Erwin (In Rem Only), Estate of Philip Gordon Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Philip Gordon Erwin (In Rem Only), Shirley Pearson (In Rem Only), Estate of Barbara Graham Bruce The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only), Estate of Rodney Goen Aka Jeffrey Rodney Goen The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Rodney Goen aka Jeffrey Rodney Goen (In Rem Only) and Estate of Randall Goen The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Randall Goen (In Rem Only), as Defendants, by the Plaintiffs' Second Amended Petition filed on 16th day of October, 2025, in a certain suit styled **GREENVILLE INDEPENDENT SCHOOL DISTRICT vs. ESTATE OF W.M. GRAHAM**, for collection of the taxes and/or miscellaneous liens on said property and that said suit is now pending in the District Court of Hunt County, Texas, 354th Judicial District, and the file number of said suit is **TAX22891**, that the names of all taxing units which assess and collect taxes on the property hereinabove described, not made parties to this suit, are HUNT MEMORIAL HOSPITAL DISTRICT; HUNT COUNTY and CITY OF GREENVILLE.

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

All parties to this suit, including plaintiff(s), defendant(s), and intervenors, shall take notice that claims not only for any taxes and/or miscellaneous liens which were delinquent on said property at the time this suit was filed but all taxes and/or miscellaneous liens becoming delinquent thereon at any time thereafter, including all interest, penalties, and costs allowed by law thereon, may, upon

request therefore, 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 said cause by all other parties herein, and all of those taxing units above named who may intervene herein and set up their respective tax claims against said property.

You are hereby commanded to appear and defend such suit on the first Monday after the expiration of forty-two (42) days from and after the date of issuance hereof, the 9th day of DECEMBER, A.D., 20 26 (which is the return day of such citation), before the honorable District Court of Hunt County, Texas, to be held at the courthouse thereof, then and there to show cause why judgment shall not be rendered for such taxes, penalties, interest, miscellaneous liens and costs, and condemning said property and ordering foreclosure of the statutory constitutional and tax liens thereon for taxes and miscellaneous liens due the plaintiff(s) and the taxing units parties hereto, and those who may intervene herein, together with all interest, penalties, and costs allowed by law and all costs of this suit.

Issued and given under my hand and seal of said court, in the City of Greenville, Hunt County, Texas this 29th day of OCTOBER, A.D., 20 26.

LINEBARGER GOGGAN
BLAIR & SAMPSON, LLP
2613 Stonewall, Suite A (75401-4257)
PO Box 8248
Greenville, TX 75404-8248
(903) 454-2059
(903)454-9856 FAX
ATTORNEY FOR PLAINTIFF(S)

SUSAN SPRADLING
CLERK OF THE DISTRICT COURTS
OF HUNT COUNTY, TEXAS
PO BOX 1437
GREENVILLE, TX 75403

BY: Shana Lee
DEPUTY

SUIT NO. TAX22891

GREENVILLE INDEPENDENT SCHOOL DISTRICT
VS.
ESTATE OF W.M. GRAHAM

DIRECTED TO:
Estate of Barbara Graham Bruce
The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only)

OFFICER'S RETURN

CAME TO HAND on the _____ day of _____, 20_____, at _____ o'clock ___.M., and I executed the foregoing citation by posting a copy thereof at the courthouse door of the Hunt County Courthouse, on the _____ day of _____, 20_____, at _____ o'clock ____.M. which day was at least 28 days prior to the return day fixed in the citation.

A copy of said Citation by Posting is hereto attached and made a part of Officer's Return on this Writ.

To certify which witness my hand.

Officer's Fee..... $_____

_____
Officer _____ County, Texas

By _____
Deputy

Subscribed and sworn to before me, this _____ day of _____, 20_____.

_____
Notary Public
State of Texas

Commission Expires: _____

SUIT NO. TAX22891

GREENVILLE INDEPENDENT SCHOOL DISTRICT	**§**	**IN THE DISTRICT COURT**
	§	
VS.	**§**	**354TH JUDICIAL DISTRICT**
	§	
ESTATE OF W.M. GRAHAM	**§**	**HUNT COUNTY, TEXAS**

THE STATE OF TEXAS
HUNT COUNTY

CITATION BY POSTING

In the name and authority of the State of Texas
Notice is hereby given as follows:

To **Estate of Barbara Graham Bruce The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only)**, if living, and if any or all of the above named Defendant(s) be deceased, the unknown heirs of each or all of the said above named deceased persons; and the unknown owner or owners of the following described property; and the executors, administrators, guardians, legal representatives, devisees of the above named persons, unknown lienholders and any and all other persons, including adverse claimants, owning or having or claiming any legal or equitable interest in or lien upon the following described property delinquent to Plaintiffs herein, for taxes and/or miscellaneous liens to wit:

Account No. 71269; 3110 TRAVIS ST 75401, THE CITY OF GREENVILLE, HUNT COUNTY, TEXAS

The amount of taxes and other liens for Plaintiff(s) exclusive of interest, penalties and costs is: $2,827.96, payable to Hunt County (Hunt Memorial Hospital District $452.26 and Greenville Independent School District $2,375.70), on said property being described as S4385 ORIG TOWN OF GREENVILLE BLK 142 LOT 6 ACRES .1529 MORE OR LESS AND BEING MORE PARTICULARLY DESCRIBED IN THAT CERTAIN DEED OF RECORD IN VOLUME 438 PAGE 153 IN THE DEED RECORDS OF HUNT COUNTY, TEXAS..

You have been sued. You may employ an attorney. You are hereby commanded to appear and defend such suit on the first Monday after the expiration of forty-two (42) days from and after the date of issuance hereof. If you or your attorney do not file a written answer with the clerk who issued this citation, a judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby notified that suit has been brought by the Hunt County Tax Collector, GREENVILLE INDEPENDENT SCHOOL DISTRICT, hereinafter called Plaintiffs, against **Estate**

of W.M. Graham aka Wiley Maddox Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of W.M. Graham aka Wiley Maddox Graham (In Rem Only), Estate of Letha Graham aka Litha Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Letha Graham aka Litha Graham (In Rem Only), Estate of Russell B. Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Russell B. Graham (In Rem Only), Estate of Shirley Agatha Graham Erwin the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Shirley Agatha Graham Erwin (In Rem Only), Estate of Dan Graham aka Dan Burton Graham the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Dan Graham aka Dan Burton Graham (In Rem Only), Estate of Nettie Lou Graham Harris the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Nettie Lou Graham Harris (In Rem Only), Estate of Barbara Sue Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Sue Erwin (In Rem Only), Estate of Gary Wayne Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Gary Wayne Erwin (In Rem Only), Estate of Robert Leo Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Robert Leo Erwin (In Rem Only), Estate of Steve Foster Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Steve Foster Erwin (In Rem Only), Estate of Philip Gordon Erwin The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Philip Gordon Erwin (In Rem Only), Shirley Pearson (In Rem Only), Estate of Barbara Graham Bruce The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only), Estate of Rodney Goen Aka Jeffrey Rodney Goen The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Rodney Goen aka Jeffrey Rodney Goen (In Rem Only) and Estate of Randall Goen The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Randall Goen (In Rem Only), as Defendants, by the Plaintiffs' Second Amended Petition filed on 16th day of October, 2025, in a certain suit styled **GREENVILLE INDEPENDENT SCHOOL DISTRICT vs. ESTATE OF W.M. GRAHAM**, for collection of the taxes and/or miscellaneous liens on said property and that said suit is now pending in the District Court of Hunt County, Texas, 354th Judicial District, and the file number of said suit is **TAX22891**, that the names of all taxing units which assess and collect taxes on the property hereinabove described, not made parties to this suit, are HUNT MEMORIAL HOSPITAL DISTRICT; HUNT COUNTY and CITY OF GREENVILLE.

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

All parties to this suit, including plaintiff(s), defendant(s), and intervenors, shall take notice that claims not only for any taxes and/or miscellaneous liens which were delinquent on said property at the time this suit was filed but all taxes and/or miscellaneous liens becoming delinquent thereon at any time thereafter, including all interest, penalties, and costs allowed by law thereon, may, upon

request therefore, 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 said cause by all other parties herein, and all of those taxing units above named who may intervene herein and set up their respective tax claims against said property.

You are hereby commanded to appear and defend such suit on the first Monday after the expiration of forty-two (42) days from and after the date of issuance hereof, the 9th day of DECEMBER, A.D., 20 26 (which is the return day of such citation), before the honorable District Court of Hunt County, Texas, to be held at the courthouse thereof, then and there to show cause why judgment shall not be rendered for such taxes, penalties, interest, miscellaneous liens and costs, and condemning said property and ordering foreclosure of the statutory constitutional and tax liens thereon for taxes and miscellaneous liens due the plaintiff(s) and the taxing units parties hereto, and those who may intervene herein, together with all interest, penalties, and costs allowed by law and all costs of this suit.

Issued and given under my hand and seal of said court, in the City of Greenville, Hunt County, Texas this 29th day of OCTOBER, A.D., 20 26.

LINEBARGER GOGGAN
BLAIR & SAMPSON, LLP
2613 Stonewall, Suite A (75401-4257)
PO Box 8248
Greenville, TX 75404-8248
(903) 454-2059
(903)454-9856 FAX
ATTORNEY FOR PLAINTIFF(S)

SUSAN SPRADLING
CLERK OF THE DISTRICT COURTS
OF HUNT COUNTY, TEXAS
PO BOX 1437
GREENVILLE, TX 75403

BY: Shana Lee
DEPUTY

SUIT NO. TAX22891

GREENVILLE INDEPENDENT SCHOOL DISTRICT
VS.
ESTATE OF W.M. GRAHAM

DIRECTED TO:
Estate of Barbara Graham Bruce
The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only)

OFFICER'S RETURN

CAME TO HAND on the _____ day of _____, 20_____, at _____ o'clock ___.M., and I executed the foregoing citation by posting a copy thereof at the courthouse door of the Hunt County Courthouse, on the _____ day of _____, 20_____, at _____ o'clock ____.M. which day was at least 28 days prior to the return day fixed in the citation.

A copy of said Citation by Posting is hereto attached and made a part of Officer's Return on this Writ.

To certify which witness my hand.

Officer's Fee..... $_____

_____
Officer _____ County, Texas

By _____
Deputy

Subscribed and sworn to before me, this _____ day of _____, 20_____.

_____
Notary Public
State of Texas

Commission Expires: _____

Filed 10/19/2026 9:58 AM
Susan Spradling,
District Clerk
Hunt County, Texas

SL

SUIT NO. TAX22891

GREENVILLE INDEPENDENT SCHOOL DISTRICT	§	**IN THE DISTRICT COURT**
	§	
VS.	§	**354TH JUDICIAL DISTRICT**
	§	
ESTATE OF W.M. GRAHAM	§	**HUNT COUNTY, TEXAS**

PLAINTIFFS' SECOND AMENDED PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

I.

PLAINTIFF(S)

This suit is brought under TEXAS PROPERTY TAX CODE § 33.41 by the following named Plaintiff(s), whether one or more, each of which is a taxing unit and legally constituted and authorized to impose and collect taxes on property:

GREENVILLE INDEPENDENT SCHOOL DISTRICT

The Plaintiff(s) intends discovery to be conducted under Level 2 of Rule 190, Texas Rules of Civil Procedure.

Plaintiff(s) petition is amended pursuant to Rule 62 and 63, Texas Rules of Civil Procedure, in the following particulars:

AMEND TO CORRECT DEFENDANT INFORMATION

DEFENDANT(S)

The following are named as Defendant(s) in this suit and may be served with notice of these claims by service of citation at the address and in the manner shown as follows:

Estate of W.M. Graham aka Wiley Maddox Graham, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of W.M. Graham aka Wiley Maddox Graham (In Rem Only);

Estate of Letha Graham aka Litha Graham, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Letha Graham aka Litha Graham (In Rem Only);

Estate of Russell B. Graham, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Russell B. Graham (In Rem Only);

Estate of Shirley Agatha Graham Erwin, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Shirley Agatha Graham Erwin (In Rem Only);

Estate of Dan Graham aka Dan Burton Graham, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Dan Graham aka Dan Burton Graham (In Rem Only);

Estate of Nettie Lou Graham Harris, the heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Nettie Lou Graham Harris (In Rem Only);

Estate of Barbara Sue Erwin, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Sue Erwin (In Rem Only);

Estate of Gary Wayne Erwin, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Gary Wayne Erwin (In Rem Only);

Estate of Robert Leo Erwin, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Robert Leo Erwin (In Rem Only);

Estate of Steve Foster Erwin, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Steve Foster Erwin (In Rem Only);

Estate of Philip Gordon Erwin, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Philip Gordon Erwin (In Rem Only);

Shirley Pearson (In Rem Only), 1867 W Parks Road, Raymond, MS 39154;

Estate of Barbara Graham Bruce, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Barbara Graham Bruce (In Rem Only);

Estate of Rodney Goen Aka Jeffrey Rodney Goen, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Rodney Goen aka Jeffrey Rodney Goen (In Rem Only);

Estate of Randall Goen, The heirs, unknown heirs, executors, administrators and legal representatives of the Estate of Randall Goen (In Rem Only)

if living, and if any or all of the above named Defendant(s) be deceased, the unknown heirs of each or all of the said above named deceased persons; and the unknown owner or owners of the following described property; and the executors, administrators, guardians, legal representatives, devisees of the above named persons; and any and all other persons, including adverse claimants, owning or having any legal or equitable interest in or lien upon the below described property located in the county in which this suit is brought.

The following taxing unit(s), whether one or more, is joined as a party herein as required by TEXAS PROPERTY TAX CODE § 33.44(a) because it may have a claim for delinquent taxes against all or part of the same property described below: **HUNT MEMORIAL HOSPITAL DISTRICT; HUNT COUNTY and CITY OF GREENVILLE**. The foregoing named taxing unit(s), if any, is invited to add its claim by intervening herein.

II.

Claims for all taxes becoming delinquent on said property at any time subsequent to the filing of this suit, up to the day of judgment, including all penalties, interest, attorney's fees, and costs on same, are incorporated in this suit, and Plaintiff(s) is entitled to recover the same, upon proper proof, without further citation or notice. Plaintiff(s) is further entitled to recover each penalty that is incurred and all interest that accrues on all delinquent taxes imposed on the property from the date of judgment to the date of sale. Plaintiffs previously filed a related case in a lawsuit styled and numbered as follows: Suit No. TAX21958, styled HUNT COUNTY VS. WM GRAHAM, which was filed in the 196TH DISTRICT COURT of Dallas County, Texas.

III.

As to each separately described property shown below, there are delinquent taxes, penalties, interest, and costs justly due, owing and unpaid to Plaintiff(s) for the tax years and in the amounts as follows, if paid in October, 2026:

PROPERTY AND AMOUNTS OWED

ACCT. NO.71269; S4385 ORIG TOWN OF GREENVILLE BLK 142 LOT 6 ACRES .1529 MORE OR LESS AND BEING MORE PARTICULARLY DESCRIBED IN THAT CERTAIN DEED OF RECORD IN VOLUME 438 PAGE 153 IN THE DEED RECORDS OF HUNT COUNTY, TEXAS.

GREENVILLE INDEPENDENT SCHOOL DISTRICT

Tax Year(s)	Tax Amount	Penalties and Interest	Total Due
1993	$21.23	$102.08	$123.31
1994	$21.54	$100.59	$122.13
1995	$21.54	$97.61	$119.15
1996	$21.86	$96.04	$117.90
1997	$22.79	$96.99	$119.78
1998	$24.03	$98.94	$122.97
1999	$23.93	$95.24	$119.17
2000	$24.52	$94.18	$118.70
2001	$27.13	$100.47	$127.60
2002	$27.13	$96.74	$123.87
2003	$34.70	$125.62	$160.32
2004	$33.99	$118.14	$152.13
2005	$33.80	$112.62	$146.42
2006	$31.35	$99.94	$131.29
2007	$24.60	$74.88	$99.48
2008	$24.69	$71.59	$96.28
2009	$24.52	$67.58	$92.10
2010	$24.73	$64.59	$89.32
2011	$24.46	$60.36	$84.82
2012	$24.30	$56.46	$80.76
2013	$24.44	$53.27	$77.71

2014	**$28.05**	**$57.10**	**$85.15**
2015	**$27.91**	**$52.81**	**$80.72**
2016	**$30.50**	**$53.32**	**$83.82**
2017	**$30.49**	**$48.91**	**$79.40**
2018	**$58.82**	**$85.88**	**$144.70**
2019	**$63.88**	**$84.07**	**$147.95**
2020	**$121.43**	**$142.32**	**$263.75**
2021	**$151.49**	**$155.74**	**$307.23**
2022	**$277.76**	**$245.55**	**$523.31**
2023	**$338.93**	**$250.81**	**$589.74**
2024	**$349.05**	**$208.03**	**$557.08**
2025	**$356.11**	**$160.97**	**$517.08**
TOTALS:	**$2,375.70**	**$3,429.44**	**$5,805.14**
TOTAL DUE			**$5,805.14**

The total aggregate amount of taxes, penalties, interest, and attorney's fees (if any) for which Plaintiff(s) sues is **$5,805.14**, subject to additional taxes, penalties, interest, and attorney's fees that accrue subsequent to the filing of this petition.

IV.

All of the taxes were authorized by law and legally imposed in the county in which this suit is brought. The taxes were imposed in the amount(s) stated above 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. Plaintiff(s) now has and asserts a lien on each tract of real property and each item of personal property described herein to secure the payment of all taxes, penalties, interest and costs due. Pursuant to Rule 54 of the Texas Rules of Civil Procedure, Plaintiff(s) affirmatively avers that all things required by law to be done have been done properly by the appropriate officials and all conditions precedent have been met.

V.

All of the property described above was, at the time the taxes were assessed, located within the territorial boundaries of each taxing unit in whose behalf this suit is brought. All Defendants named in this suit either owned the property that is the subject of this suit on January 1 of the year in which taxes were imposed on said property, or owned or claimed an interest in or lien upon said property at the time of the filing of this suit. The value of any personal property that may be described above, and against which the tax lien is sought to be enforced, is in excess of FIVE HUNDRED AND NO/100 DOLLARS ($500.00).

VI.

The Law Firm represented by the attorney whose name is signed hereto is legally authorized and empowered to institute and prosecute this action on behalf of Plaintiff(s). Plaintiff(s) should recover attorney's fees as provided by law for the prosecution of this case, and such attorney's fees should be taxed as costs.

VII.

Plaintiff(s) may have incurred certain expenses in the form of abstractor's costs in procuring data and information as to the name, identity and location of necessary parties, and in procuring necessary legal descriptions of the property that is the subject of this suit. Said expenses, if incurred, are reasonable and are in the following amount: **$175.00.** The abstractor's costs, if any be shown, should be taxed as costs herein.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff(s) requests that citation be issued and served upon each Defendant named herein, commanding them to appear and answer herein in the time and manner required by law. Plaintiff(s) further prays, upon final hearing in this cause, for foreclosure of its liens against the above-described property securing the total amount of all delinquent taxes, penalties and interest, including taxes, penalties and interest becoming delinquent during the pendency of this suit, costs of court, attorney's fees, abstract fees, and expenses of foreclosure sale. Plaintiff(s) further prays for personal judgment against Defendant(s) who owned the property on January 1 of the year for which the taxes were imposed for all taxes, penalties, interest, and costs that are due or will become due on the property, together with attorney's fees and abstractor's fees. Plaintiff(s) further prays for: (1) the appropriate order of sale requiring the foreclosed property to be sold, free and clear of any right, title or interest owned or held by any of the named Defendants, at public auction in the manner prescribed by law, and (2) writs of execution, directing the sheriffs and constables for the State of Texas, to search out, seize, and sell sufficient property of the Defendant(s) against whom personal judgment may be awarded to satisfy the lawful judgment sought herein. Finally, Plaintiff(s) prays for such other and further relief, at law or in equity, to which it may show itself justly entitled.

Respectfully submitted,

LINEBARGER GOGGAN
BLAIR & SAMPSON, LLP
2613 Stonewall, Suite A (75401-4257)
PO Box 8248
Greenville, TX 75404-8248
(903) 454-2059
(903) 454-9856 - FAX

Brandon E. Lane
State Bar No. 24039007
Greenville.litigation@lgbs.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been delivered in the manner required by, Texas Rules Civil Procedure, to all parties or their attorneys in this cause, on the 16th day of October, 2026, addressed as follows:

Jason Miller
Attorney at Law
2611 Lee Street
Greenville, TX 75401
jasonmiller@icloud.com

Shirley Pearson (In Rem Only)
1867 W Parks Road
Raymond, MS 39154

Perdue Brandon Fiedler Collins & Mott LLP
P.O. Box 2007
Tyler, TX 75710

Brandon E. Lane
State Bar No. 24039007
Greenville.litigation@lgbs.com
Attorney for Plaintiff