

CAUSE NO. 22-00105

CSD VAN ZANDT LLC

Plaintiff/Counter Defendant

v.

\$ IN THE DISTRICT COURT

UDO BIRNBAUM

Defendant/Cross Plaintiff

\$

\$ 294TH JUDICIAL DISTRICT

v.

\$

ROBERT O. DOW

COREY KELLAM

CELIA C. FLOWERS

VAN ZANDT COUNTY

Cross Defendants

\$

VAN ZANDT COUNTY, TX

\$

FIRST SET OF INTERROGATORIES TO CSD VAN ZANDT LLC

PLEASE NOTE: Standard rules apply: responses to be verified, answers to be preceded by the question, 30 days, etc. Also RCP 197.2 Response to Interrogatories (d) Verification required; A responding party - **not an agent or attorney** as otherwise permitted by Rule 14 - must sign the answers under oath

INTERROGATORY NO. 1:

IDENTIFY the document of title conveying legal capacity to such LISA LEGER GIROT to bring about such transfer of title (Plaintiff Attachment 1)

INTERROGATORY NO. 2:

IDENTIFY the document of title conveying legal capacity to such PATRICIA MOORE BARCLAY to bring about such transfer of title (Plaintiff Attachment 1)

INTERROGATORY NO. 3:

IDENTIFY the document of title conveying legal capacity to such JAMES T. MOORE III to bring about such transfer of title (Plaintiff Attachment 1).

UDO BIRNBAUM, *Pro Se*
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Certificate of Service Oct. 10, 2022
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