

CAUSE NO. 25-00024

UDO BIRNBAUM	\$	IN THE DISTRICT COURT
Plaintiff	\$	
v.	\$	294TH JUDICIAL DISTRICT
CSD VAN ZANDT LLC	\$	
Defendant	\$	VAN ZANDT COUNTY, TX

NOTICE OF OVERDUE DISCOVERY ANSWER

Such Request on 4-8-2025, received by CSD on 4-21-2022, due 5-21-2025. (See Attach "A" – Request, Attach "B", USPS Record).

Below, for convenience, direct "paste" of the Request:

START of "paste"

FIRST INTERROGATORY TO CSD VAN ZANDT LLC

Regarding CSD Van Zandt LLC ("CSD"), in the underlying Cause 22-00105 CSD Van Zandt LLC vs. Udo Birnbaum, CSD therein claiming to have had a regular chain of conveyance:

"15. Plaintiff obtained title to the Property via a regular chain of conveyance from the sovereign, as explained hereinabove. To reiterate, Mr. and Mrs. Travis conveyed the Property to Defendant, who conveyed same to Gwendolyn Wright Thibodeaux. **Upon her death, the Property passed to Louis Thibodeaux, Patricia Moore Barclay, and James T. Moore, III.** Subsequently, Lisa Leger Girot inherited Louis Thibodeaux's interest in the Property upon his death. Plaintiff then purchased the Property from Lisa Leger Girot, Patricia Moore Barclay, and James T. Moore, III. As such, Plaintiff is entitled to immediate possession of the Property and a declaration of title in Plaintiff's favor and against Defendant." (emphasis added)

CONTINUE of "paste"

INTERROGATORY NO. 1

- **IDENTIFY**, by attach, such documents as you claim conveyed such **"the Property"**, out of the estate of such Gwendolyn Wright Thibodeaux, [so as to get] **"passed to Louis Thibodeaux, Patricia Moore Barclay, and James T. Moore"**

UDO BIRNBAUM
119 AN County Road 2501
Tennessee Colony, TX 75861
903-922-5996
BRNBM@AOL.COM

CERTIFICATE OF SERVICE
Today April 7, 2025 by CMRR
9589 0710 5270 0944 2906 87
to: THE LAW OFFICE OF
CHRISTOPHER L. SULLIVAN PLLC

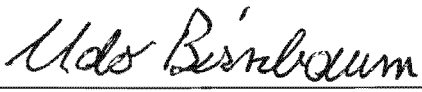
END of "paste"

SUMMARY PRAYER

The issue in this cause of Petition for a Bill of Review being whether Plaintiff UDO BIRNBAUM, in the underlying Cause No. 22-00105, CSD Van Zandt LLC vs. Udo Birnbaum, whether Birnbaum was deprived of his Right to present his defense, indeed his cause, by being deprived of his Right to a trial, indeed a jury trial, and was thus unlawfully dispossessed of his 42-year 150 acre homestead.

It must therefore rightfully be of interest to this court, whether CSD Van Zandt LLC, ie. Robert O. Dow, indeed had purported conveyance of TITLE, conveyance of title in Texas by a DEED, and solely by a DEED.

Plaintiff UDO BIRNBAUM prays this Court to force CSD Van Zandt LLC, i.e. manager/owner Robert O. Dow, to produce, for examination, such chain of conveyance of title as he purports to have, and being impossible to have such, GET HIM OFF MY PROPERTY.


UDO BIRNBAUM, *Pro Se*
119 AN County Road 2501
Tennessee Colony, Texas 75861
903-922-5996
BRNBM@AOL.COM

Attach "A" and "B"

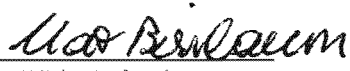
CERTIFICATE OF SERVICE

Today May 30, 2025, CMRR 9589 0710 5270 2057 7945 19 to:

- District Clerk, 121 E. Dallas St., Suite 302, Canton, TX 75103

Also, email attach:

- Corey Kellam, corey@sullivanlawoffices.com
- Nicole Faragen, nicole@sullivanlawoffices.com
- Kent Canada, kent@sullivanlawoffices.com
- District Court, wbarker@vanzandtcounty.org
- Court at Law, aanthony@vanzandtcounty.org
- District Attorney, tcurry@vanzandtcounty.org


Udo Birnbaum

Attach "A"

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Plaintiff	\$	
v.	\$	294TH JUDICIAL DISTRICT
CSD VAN ZANDT LLC	\$	
Defendant	\$	VAN ZANDT COUNTY, TX

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/ss/

UDO BIRNBAUM
119 AN County Road 2501
Tennessee Colony, TX 75861
903-922-5996
BRNBM@AOL.COM

CERTIFICATE OF SERVICE
Today April 7, 2025 by CMRR
9589 0710 5270 0944 2906 87
to: THE LAW OFFICE OF
CHRISTOPHER L. SULLIVAN PLLC

USPS Tracking®

Attach "B"

FAQs >

Tracking Number:

Remove X

9589071052700944290687

Copy Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to an individual at the address at 3:40 pm on April 21, 2025 in SOUTHLAKE, TX 76092.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

SOUTHLAKE, TX 76092

April 21, 2025, 3:40 pm

Notice Left (No Authorized Recipient Available)

SOUTHLAKE, TX 76092

April 19, 2025, 12:58 pm

Out for Delivery

SOUTHLAKE, TX 76092

April 19, 2025, 7:23 am

Arrived at Post Office

SOUTHLAKE, TX 76092

April 19, 2025, 7:12 am

In Transit to Next Facility

April 12, 2025

Departed Post Office

Feedback

CMRR 9589 0710 5270 2057 7945 19

May 29, 2025

To: Karen Wilson, District Clerk
County Courthouse
121 E. Dallas St., Suite 302
Canton TX, 75103

From: Udo Birnbaum
119 AN County Road 2501
Tennessee Colony, TX 75861

Re: No. 25-00024 Udo Birnbaum vs. CSD Van Zandt LLC

Herewith: Notice of Overdue Discovery Answer

Would appreciate email attach of file marked document.

Thank you,



UDO BIRNBAUM
119 AN County Road 2501
Tennessee Colony, TX 75861
903-922-5996
BRNBM@AOL.COM

CMRR 9589 0710 5270 2057 7945 19