

CAUSE NO. 22-00105

CSD VAN ZANDT LLC  
Plaintiff

v.

UDO BIRNBAUM  
Defendant

§ IN THE DISTRICT COURT

§ 294TH JUDICIAL DIISTRICT

§ VAN ZANDT COUNTY, TX

**ANSWER AND COUNTERCLAIM**

COMES NOW, UDO BIRNBAUM, (“Defendant”) and files this *Answer and Counterclaim*.

KAREN WILSON  
DIST CLERK VAN ZANDT CO. TX  
BY *TM*  
DEP

2022 AUG 29 PM 1:01

FILED FOR RECORD

**ANSWER**

Defendant denies Plaintiff’s every allegation against him and occupy and have actual, corporeal and uninterrupted possession of the property.

**COUNTERCLAIM**

Defendant pleads damages in property and person of \$850,000, with recourse against the Grantor, Grantee, in-between facilitators and useful idiots, and occupy and have actual, corporeal and uninterrupted possession of the property.

*Udo Birnbaum*

UDO BIRNBAUM  
540 VZ County Road 2916  
Eustace, TX 75124  
903 802-9669  
BRNBM@AOL.COM

**Certificate of service**

Copy today August 28, 2022 by CMRR 7021 2720 0002 2601 0916 and USPS Regular Mail to Celia C. Flowers, Flowers Davis, 1021 ESE Loop 323, Suite 200, Tyler, Texas 75701

*UD*