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Sent: Thursday, July 20, 2023 8:31 AM

To: Corey R. Kellam <crk@flowersdavis.com>; brnbm@aol.com

Subject: 22-00105 CSD VAN ZANDT LLC V BIRNBAUM

Importance: High

Mr. Kellam,

The Court has completed its review and consideration of the Plaintiff's Traditional MSJ. Additional information, which was not provided by the Plaintiff, is needed and requested by the Court. To determine whether the Plaintiff, is a **bona fide purchaser without notice** of Mr. Birnbaum's claim to the subject property by the unrecorded deed of 2017, **the Court first acknowledges and finds that Ms. Lisa Girot, as notary of the unrecorded deed, had actual knowledge** of Mr. Birnbaum's claim or potential claim to the subject property. Therefore, since Ms. Girot sold and transferred her interest in the subject property to the Plaintiff, **the Court must now determine whether the Plaintiff had or should have had the same knowledge** as Ms. Girot. The Court requests the following information by affidavit:

1. At any time has Ms. Girot had any ownership in, membership in, employment in, or any other connection to CSD Van Zandt, LLC or its members, directors, or employees?

Please submit the information as soon as practicable.

Respectfully,

Waynette Barker

294th District Court Administrator

PH: 903-567-4422

FAX: 903-567-5652

Email: wbarker@vanzandtcountry.org

WHETHER Robert Dow was indeed a "bona fide purchaser without notice" is of course an "issue of fact" for a JURY.

Judge Chris Martin knowingly and willfully defrauded me of a jury trial, so as to him "under color of law" steal my homestead, **THAT SIMPLE DOES NOT TAKE AN EINSTEIN..**