Certified Mail 7017 2680 0000 9293 9519

#### CAUSE NO. JP01-18-SC00012857

012857 MAY 2 9 2018

SHEIK TEHUTI, Plaintiff,	§ IN THE JUSTICE OF PEACE COURT
,	§ TARRANT COUNTY, TEXAS
	§ JUTSIC OF PEACE ONE
V.	§
	§ Petitioner is appearing before
CONSTABLE MICHAEL R. CAMPBI	LL § this Court by Special Appearance
AND DEPUTY CONSTABLE J. W.	§ without; Waiving any rights,
Defendant.	§ remedies or defenses, Statutory or
	§ procedural

### **AFFIDAVIT**

I, Sheik Tehuti, of lawful age and competent to testify, being first duly sworn, upon oath state as follows:

- February 5, 2018, at the house located at 3416 Manordale Court, Forest Hill, Texas 76140 Constable J. W. posted a fraudulent or frivolous document on the door of Sheik Tehuti.
- 2. February 14, 2018, at 3416 Manordale Court, Forest Hill, Texas 76140, Attorney Kelly J. Curnutt, Constable Michael Campbell and Deputy J. W. came to Sheik Tehuti home estate change the locks, sit all of Sheik Tehuti property on public street, vigilante law.
- 3. Around February 6, 2018, previous notice, Precinct 8 Constable Michael Campbell and Deputy J.W. that property was under appeal case no. 02-17-00440-CV.
- 4. Around February 6, 2018, previous notice was given to Precinct 8 and Constable Office, Constable Michael Campbell and Deputy J.W. that the property is under Bankruptcy pending case no 1:12-bk-12020 and order by Judge Glenn an injunction under Article IX of the Plan.
- 5. As a result, individual Constable Michael Campbell and Deputy J.W. have deprived Sheik Tehuti of property without subject matter jurisdiction.



- 6. As a result, individual Constable Michael Campbell and Deputy J.W., Sheik Tehuti, has been deprived of due process of law and violation of Texas Rule 510.8.
- 7. I, Sheik Tehuti, and my mother, paid for the home upon September 16, 1998, see Warranty D198219507.
- 8. As a result, of the actions of Constable Michael Campbell and Deputy J.W., I have been damaged financially and damaged emotionally.
- 9. As a result, Constable Michael Campbell and Deputy J.W. has violated their Oath of Office and Article I, Article III, Article IV, Article VII, Article IX, Article X and Article XIV.
- 10. As a result, Constable Michael Campbell and Deputy J.W. are in violation of the Constable Code of Ethics:
  - a. I shall, at all times, function without prejudice or regard for an individual's race, religion or place of birth.
  - b. I shall never be a part of an attempt to inhibit or evade the law.
  - c. I shall be courteous and maintain self-restraint, scorn, ridicule and contempt.
  - d. I recognize my badge of authority as a symbol of the public trust and I recognize that as a law enforcement officer, I shall never bring disgrace upon the people, whose faith and confidence elected me as their Constable.
  - e. I recognize my duty to protect the constitutional rights of the people.
  - f. I shall never resort to unnecessary force in the performance of my duties
  - g. I shall perform my duties expeditiously and promptly and shall transmit an immediate report to those whose work I have accepted.
- 11. As a result, the Judge records misplaced by the clerk, original petition filed February 7, 2018, Judicial Notice filed February 26, 2018 and Motion for Default filed April 2, 2018, be entered into the record without interference of Thomas Wilder.
- 12. As a result, of judicial act of the Eleventh Amendment, the judicial power shall not be construed to extend to any suit in law or equity commence or prosecuted against Sheik Tehuti or one of the United States by Constable Michael Campbell and Deputy J.W., a corporation or subject are any foreign (State) corporation Constable Office of Precinct 8 or Ha To Tu of Sheik Tehuti Estate.

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The affidavit itself is prima facie evidence, because there is a maxim of law that "an unrebutted affidavit stands at the truth in commerce."

Further Affiant Sayth Not.

Done this 2/5 day of May 2018 A.D

UCC 1-308 All Rights Reserved

Respectfully submitted,

Sheik Tehuti

(214) 809-8925

P.O. Box 912

Hutchins, TX 75141

sheik.tehuti@yahoo.com

### **JURAT**

SUBCRIBED TO AND SWORN before me this 21st day of May, A.D. 2018, a Notary, that Sheik Tehuti, personally appeared and known to me to be the man whose name subscribed to the within instrument and acknowledged to be the same.

Notary Public in and for said State

My Commission expires; 7- 25 -202/

MARY DAVIS
Notary ID #8820886
My Commission Expires
July 25, 2021

### CAUSE NO. JP01-18-SC00012857

SHEIK TEHUTI,	§ IN THE JUSTICE OF PEACE COURT
Plaintiff,	§
	§ TARRANT COUNTY, TEXAS
	§ JUTSIC OF PEACE ONE
V.	§
	§ Petitioner is appearing before
CONSTABLE DEPUTY J. W.	§ this Court by Special Appearance
AND CONSTABLE J. W.	§ without; Waiving any rights,
Defendant.	§ remedies or defenses, Statutory or
	§ procedural

PLAINTIFF'S CONSOLIDATED FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR SUBJECT MATTER JURISDICTION AND PRODUCTION OF DOCUMENTS AND DELEGATION OF AUTHORITY OF WRIT OF POSSESSION VIOLATIONS OF PENDING APPEALS COURT CASE 02-17-00440-CV AND U.S. BANKRUPTCY COURT CASE 1:12-BK-12020 TO CONSTABLE DEPUTY J. W. DEFENDANT

### INTERROGATORIES

To: Constable Deputy J. W. and Defendant, Justice of Peace Precinct 8.

Sheik Tehuti, Plaintiff, serves these interrogatories on Constable Deputy J. W., Defendant, as allowed by Texas Rule of Civil Procedure 197. Constable Deputy J. W. must answer each interrogatory separately, fully, in writing, and under oath, within 30 days after service.

### A. Instructions

For requested information about the property located at 3416 Manordale Court Forest Hill, Texas 76140 that is owned by Sheik Tehuti and has a pending Appeals Court Case Number 02-17-00440-CV and a pending U.S. Bankruptcy Court Case Number 1:12-bk-12020 that has an injunction under Article IX.1 of the Bankruptcy Plan, also identify having the knowledge about TX Rule 510. 8 Writs, Oath of Office and Code of Ethics for Constables evidencing proof of claim of any authority to set all of Sheik Tehuti property on public streets.

### B. Definitions

The following definitions shall have the following meanings, unless the context requires otherwise:

- 1. "Plaintiff" or "defendant," as well as a party's full or abbreviated name or a pronoun referring to a party, means the party, and when applicable, the party's agents, representatives, officers, directors, employees, 5the party's control, whether directly or indirectly, including any attorney.
- 2. "You" or "your" means Constable Deputy J. W., its successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, and all other persons acting on behalf of Constable Deputy J. W. or its successors, predecessors, divisions, and subsidiaries.

Sheik Tehuti - Consolidated First Set of Interrogatories and First Request for Production of

- 3. "Document" means all written, typed, or printed matter of delegation of authority of any kind in your actual possession, custody, or control, that constitutes or contains matters relevant to the subject matter of the action Writ of Possession. "Document" includes, but is not limited to, the following: letters, reports, charts, diagrams, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notations of telephone or personal conversations or conferences, interoffice communications, e-mail, microfilm, bulletins, circulars, pamphlets, photographs, faxes, invoices, tape recordings, computer printouts, drafts, resumes, logs, worksheets for Delegation of Authority to overrule the Court of Appeals and U.S. Bankruptcy Court.
  - 4. "2nd Court of Appeals" means pending case number 02-17-00440-CV.
  - 5. "U.S. Bankruptcy Court" means pending case number 1:12-bk-.
  - 6. "Texas Rule 510.8" means rules under Writ of Possession.
  - 7. "Contract" means Writ of Possession.
    - a. The full name.
    - b. Occupation, job title, employer and employer address at the time of the event
    - c. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory and the officer who is responsible for supervising that officer or employee
  - 8. "Notice" means notice posted on door.
  - 9. "Identify" or "describe," when referring to a person, means you must state the following:
    - a. The full name.
    - b. The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory.
    - c. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory and the officer who is responsible for supervising that officer or employee.
  - 10. "Identify" or "describe," when referring to a document Writ of Possession and Notice on Door, means you must state the following:
    - a. The nature of the document (e.g., letter, handwritten note).
    - b. The title or heading that appears on the document.
    - c. The date of the document and the date of each addendum, supplement, or other addition or change.
    - d. The identities of the author, signer of the document, and person on whose behalf or at whose request or direction the document was prepared or delivered.

e. The present location of the document and the name, address, position or title, and telephone number of the person or persons having custody of the document.

"The Eviction Notice" means the eviction notice and Writ of Possession dated February 5, 2018 that is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

- 11. Identify your Oath of Office
  - a. The date you took the Oath of Office.
  - b. The date of your Oath of Office Bond.
- 12. Identify your Insurance Bond
  - a. The date you got your insurance bond.
  - b. The amount you are covered for on the Insurance Bond.

That is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

### **INTERROGATORIES**

Interrogatory No. 1: Identify the individual completing these responses to Plaintiffs First Set of Interrogatories on behalf of Constable Deputy J. W. and Writ of Possession

Answer:

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Interrogatory No. 2: Describe Delegation of Authority that Constable Deputy J. W. claims that
under the terms of the Appeals Court exclusive to Rule 510.8 identification and orders, authority
of the Writ of Possession that allowed you to set all of Sheik Tehuti property of the street.

Answer:	
	No. 3: Describe Delegation of Authority that Constable Deputy J. W. claims the
authority of the	s of the U.S. Bankruptcy Court exclusive to Rule 510.8 identification and orde e Writ of Possession that allowed you to set all of Sheik Tehuti property of the
authority of the street.	- ·
authority of the street.	- ·
	- ·
authority of the street.	- ·
authority of the street.	- ·

Answer:

Interrogatory No. 5: Identify the document and individual(s) who determined that the U. S. Bankruptcy Court claims pending does apply to the property located at 3416 Manordale Court, Forest Hill, Texas does not apply to Constable Michael R. Campbell under the orders of Judge Glenn, Article IX of the Plan.

Answer:

Interrogatory No. 6: Identify the Oath of Office Bond and Insurance Bond describing in full the basis for the claims of delegation of authority and subject matter jurisdiction to set Sheik Tehuti property on public streets.

Answer:

Interrogatory No. 7: Identify the Oath of Office and Due Process of Law of the Constitution apply to the property located at 3416 Manordale Court, Forest Hill, Texas 76140, describe the full basis of denial of due process of law and Oath of Office

a. Article I
b. Article III
c. Article IV
d. Article VII
e. Article IX
f. Article X
g. Article XIV

Answer:

Interrogatory No. 8: Identify the Constables Code of Ethics that did not apply to Sheik Tehuti, the 2nd Court of Appeals and U.S. Bankruptcy Court.

- a. I shall, at all times, function without prejudice or regard for an individual's race, religion or place of birth.
- b. I shall never be a part of an attempt to inhibit or evade the law.

- c. I shall be courteous and maintain self-restraint, scorn, ridicule and contempt.
- d. I recognize my badge of authority as a symbol of the public trust and I recognize that as a law enforcement officer, I shall never bring disgrace upon the people, whose faith and confidence elected me as their Constable.
- e. I recognize my duty to protect the constitutional rights of the people.
- f. I shall never resort to unnecessary force in the performance of my duties
- g. I shall perform my duties expeditiously and promptly and shall transmit an immediate report to those whose work I have accepted.

Answer:

# PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS

To: Constable Deputy J. W., Defendant, Justice of Peace Precinct 8.

Pursuant to rule 196 of the Texas Rules of Civil Procedure, you are requested to produce and permit the inspection and copying of each of the items or categories of items identified in the attached Exhibit A. You are to produce these items or categories of items at Justice of the Peace Court Precinct 1 Tarrant County, Texas and P.O. Box 912, Hutchins, Texas 75141 at 2:00 pm on June 15, 2018, or no later than thirty days from the date you receive this request.

Please note that if, after you submit your responses to these requests for production, you learn that any such response was either incomplete when made, or, although complete and correct when made, it is no longer complete and correct, you must amend or supplement your response reasonably promptly after you discover the necessity for such a response. Any amended or supplemental response made less than thirty days before trial will be presumed not to have been made reasonably promptly. A failure to make, amend, or supplement a response in a timely manner may result in your not being able to introduce into evidence the material or information not timely disclosed.

#### **Definitions**

"You" or "your" refers to you, your attorneys, accountants, bookkeepers, agents, employees, and/or

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representatives.

"Defendant" means Constable Deputy J. W. and all agents, employees, and other persons acting on its behalf.

"Documents and tangible things" means the existence, description, nature, custody, condition, location, and contents of papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, data, and data compilations in your possession, custody, or control or known to you or your counsel, whether printed, computerized, microfilmed, reproduced by any other mechanical process or medium of expression, or written or produced by hand and whether or not claimed to be privileged. confidential, or personal, including but not limited to the final versions and all prior drafts of contracts: agreements; notes (including secretarial notes); business records; notebooks; work notes; work papers; communications (including intradepartmental communications and intercompany communications): facsimiles; telecopies; telefaxes; electronic mail; correspondence; statements; reports; telegrams; agendas; forms; memoranda; bulletins; appointment books; logs; messages; diaries; texts; manuals; reference works and materials; samples of materials; depositions; analyses; projections; damage projections; forecasts; statistical statements; financial records; reports; charts; brochures; purchase orders; estimates; computer inputs and outputs; calculations; compilations of data; demonstrative evidence (including physical models, sketches, charts, graphs, plans, drawings, etc.); journals; billings; billing statements and records; receipts; invoices; data compilations; slides; sketches; graphics; charts; movies; videotapes; photographs and the negatives thereof; summaries, records or minutes of meetings or conferences; expressions of statements of policy; lists of people attending meetings or conferences; summaries, records, or reports of personal conversations or investigations; summaries, records, or reports of interviews; and all other writings, and any other similar matter, now or formerly in your possession, custody, or control or that of your counsel or of any other agent, representative, employee, bookkeeper, accountant, expert, or anyone else acting on your behalf, and includes documents used to support any conclusions or opinions reached. Any marginal comments appearing on any documents and any handwritten or other notations on any copy of a document render it original, requiring production of it or a true copy of it with such notations.

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Request No. 5: Any and all documents evidencing the U.S. Bankruptcy Court case no. 1:12-bk-12020 pending is invalid of Judge Glenn order and injunction under the rule of Article IX of the Plan, Rule of Bankruptcy. Response: Request No. 6: Any and all documents evidencing a valid Oath of Office is valid. Response: Request No. 7: Any and all documents evidencing of Oath of Office Insurance in relation and requirement of delegation of authority of certified. Response:

Request No.8: Any and all documents evidencing of proof Insurance and any Policy with subject of this litigation.

Response

Request No. 9: Any and all documents evidencing and proof of claim you have a claim

"Financial record" means, by way of example and without limitation, the original or true copies of the following items, whether printed, computerized, recorded, or reproduced by any other mechanical process or written or produced by hand: monthly unaudited statements and/or other periodic income and profit and loss statements; periodic balance sheets; financial statements or other statements regarding, relating to, or referring to your financial condition; federal and state income tax returns; volume of sales records; sales tax records and returns; payroll tax records and returns; cash disbursement journal(s); general ledger(s); receipts journal(s); accounts payable journal(s); and accounts receivable journal(s). If you are a partnership or limited partnership the phrase "financial record" also includes partnership agreement(s) and any amendments thereto and forms K-1 provided to the partners. Any marginal comments appearing on any financial record and any handwritten or other notations on any copy of a financial record render it original, requiring production of it or a true copy offit with such notations.

"Relate to" means to name, refer to either directly or indirectly, comment on, analyze, review, report on, form the basis of, be considered in the preparation of, result from, or have any logical relation or relevance to the entity, person, document, event, or action pertaining to the subject matter on which inquiry is made.

"Knowledge" means not only the personal and present knowledge of the person inquired of, but also the present knowledge of any officers, directors, agents, servants, employees, attorneys, and representatives of the person inquired of and information available to them.

"The Claims" means the claims that are the subject of this lawsuit, as alleged in Plaintiff[s'/s] original petition and amended or supplemental petition.

"Statement" is a written statement signed or otherwise adopted or approved by the person making it or a stenographic, mechanical, electrical, or other type of recording, or any transcription thereof that is a substantially verbatim recital of a statement made by the person and contemporaneously recorded.

"The Contract" means the contract for the notice posted on door of the property located at 3416 Manordale Court, Carriage Hill- Forest Hill Block 2 Lot 5. Tarrant County, Texas, that is the subject of this lawsuit.

"The Writ of Possession dated February 5, 2018 that is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

"The Property" means the land located at 3416 Manordale Court, Carriage Hill- Forest Hill Block 2 Lot 5. Tarrant County, Texas, that is the subject of this lawsuit.

#### Instructions

If any document or response to these requests is withheld or objected to under a claim of attorneyclient privilege, under a claim of limitation on scope of discovery pursuant to rule 192.4 or 193 of the Texas Rules of Civil Procedure, under a claim of work product pursuant to rule 192.5, under any other qualified privilege, or for any other reason, you are instructed to identify each such document with the following items:

- I. the date of the document;
- 2. the author and addressee(s);
- 3. all persons indicated as recipients of copies;
- 4. all persons known to you to have received the document and/or information or to have learned the substance of its contents;
  - 5. the subject matter of the document and/or response; and
- 6. the specific privilege or objection alleged to be applicable or other reason for its being withheld or not answered.

If you or any of your attorneys, agents, or representatives at any time had possession or control of a document requested and that document has been lost, destroyed, or purged or is not presently in your possession, custody, or control, identify the document and describe the circumstances surrounding the loss, destruction, purge, or separation from your possession, custody, or control, indicating the dates that those circumstances occurred.

If you allege that any request is in any manner ambiguous, you are instructed to describe in detail the reasons for your allegations that the request is ambiguous, including but not limited to each interpretation that you allege the specific request for discovery is subject to. Notwithstanding, you are instructed to respond, to the best of your ability, to the request for production and produce the documents requested.

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If you object to any request, you are instructed to identify, with specificity, the specific procedural rule(s) or substantive laws(s) on which you base your objection.

When producing documents and tangible things responsive to a request, you must either produce them as they are kept in the usual course of business or organize and label them to correspond with the categories in the request.

### **REQUESTS FOR PRODUCTION** --

Request No. 1: Any and all documents relating to the Writ of Notice put on the door at 3416 Manordale Court, Forest Hill, Texas case no. 2017-00654-1, reference to case no. 2017-006596-1 claim against or dispute with Plaintiff.

Response:

Request No. 2: Any and all documents evidence of Writ of Possession of an expired Writ that authorize or delegation of authority to set Sheik Tehuti property on public street.

Response:

Request No. 3: Any and all documents evidencing that TRCP 510.8, rules of law in the State of Texas as related to response no. 2.

Response:

Request No. 4: Any and all documents evidencing of the Appeals Court case no. 02-17-00440-CV pending by Plaintiff is invalid of Rule 510.8 of the TRCP under the rules of law. Response:

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Forest Hill, Texas 76140 to set Sheik Tehuti's personal property on public street.

Response

### PRAYER AND REQUEST

That the record filed in this case no. SC00012857 removed from the Judges files be placed on the record by the clerks, original petition, the judicial notice and the default judgment of none response the subject of this litigation of subject matter jurisdiction and denial of due process void of Thomas Wilder and attorney for Ha To Tu, Attorney Kelly J. Curnutt, that is a violation of the Eleventh Amendment of the Constitution.

UCC 1-308 All Rights Reserved Respectfully submitted,

Sheik Tehuti
(214) 809-8925
P.O. Box 912
Hutchins, TX 75141
sheik.tehuti@yahoo.com

JURAT

SUBCRIBED TO AND SWORN before me this 2/day of \_\_\_\_\_\_\_, A.D. 2018, a Notary, that \_\_\_\_\_\_, her/c\_\_\_\_\_\_\_\_, personally appeared and known to me to be the man whose name subscribed to the within instrument and acknowledged to be the same.

18 My Dans (Seal

Notary Public in and for said State

My Commission expires; 7-25-202/

CC Judge Ralph Swearingen Jr.
District Attorney
Internal Affairs
Court of Appeals
U.S. Bankruptcy Court
Attorney General of Texas
Attorney General of New York
Channel 11 – Justice Seeker

Respectfully submitted,

MARY DAVIS Notary ID #8820886

Ay Commission Expires July 25, 2021

1 Tehnt

Sheik Tehuti

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### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Entry of Appearance was served upon Constable Deputy J. W. Defendant. by first class mail certified return receipt on May 21, 2018

#### CAUSE NO. JP01-18-SC00012857

SHEIK TEHUTI,	§ IN THE JUSTICE OF PEACE COURT 18
Plaintiff,	§
	§ TARRANT COUNTY, TEXAS
	§ JUTSIC OF PEACE ONE
V.	§
	§ Petitioner is appearing before
CONSTABLE MICHAEL R. CAMPBELL	§ this Court by Special Appearance
AND DEPUTY CONSTABLE J. W.	§ without; Waiving any rights,
Defendant.	§ remedies or defenses, Statutory or
	<pre>§ procedural</pre>

PLAINTIFF'S CONSOLIDATED FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR SUBJECT MATTER JURISDICTION AND PRODUCTION OF DOCUMENTS AND DELEGATION OF AUTHORITY OF WRIT OF POSSESSION VIOLATIONS OF PENDING APPEALS COURT CASE 02-17-00440-CV AND U.S. BANKRUPTCY COURT CASE 1:12-BK-12020 TO CONSTABLE MICHAEL R. CAMPBELL DEFENDANT

### INTERROGATORIES

To: Constable Michael R. Campbell and Defendant, Justice of Peace Precinct 8.

Sheik Tehuti, Plaintiff, serves these interrogatories on Constable Michael R. Campbell, Defendant, as allowed by Texas Rule of Civil Procedure 197. Constable Michael R. Campbell must answer each interrogatory separately, fully, in writing, and under oath, within 30 days after service.

### A. Instructions

For requested information about the property located at 3416 Manordale Court Forest Hill, Texas 76140 that is owned by Sheik Tehuti and has a pending Appeals Court Case Number 02-17-00440-CV and a pending U.S. Bankruptcy Court Case Number 1:12-bk-12020 that has an injunction under Article IX.1 of the Bankruptcy Plan, also identify having the knowledge about TX Rule 510. 8 Writs, Oath of Office and Code of Ethics for Constables evidencing proof of claim of any authority to set all of Sheik Tehuti property on public streets.

#### B. Definitions

The following definitions shall have the following meanings, unless the context requires otherwise:

- 1. "Plaintiff" or "defendant," as well as a party's full or abbreviated name or a pronoun referring to a party, means the party, and when applicable, the party's agents, representatives, officers, directors, employees, 5the party's control, whether directly or indirectly, including any attorney.
- 2. "You" or "your" means Constable Michael R. Campbell, its successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, and all other persons acting on behalf of Constable Michael R. Campbell or its successors, predecessors, divisions, and subsidiaries.

Sheik Tehuti — Consolidated First Set of Interrogatories and First Request for Production of

- 3. "Document" means all written, typed, or printed matter of delegation of authority of any kind in your actual possession, custody, or control, that constitutes or contains matters relevant to the subject matter of the action Writ of Possession. "Document" includes, but is not limited to, the following: letters, reports, charts, diagrams, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notations of telephone or personal conversations or conferences, interoffice communications, e-mail, microfilm, bulletins, circulars, pamphlets, photographs, faxes, invoices, tape recordings, computer printouts, drafts, resumes, logs, worksheets for Delegation of Authority to overrule the Court of Appeals and U.S. Bankruptcy Court.
  - 4. "2nd Court of Appeals" means pending case number 02-17-00440-CV.
  - 5. "U.S. Bankruptcy Court" means pending case number 1:12-bk-.
  - 6. "Texas Rule 510.8" means rules under Writ of Possession.
  - 7. "Contract" means Writ of Possession.
    - a. The full name.
    - b. Occupation, job title, employer and employer address at the time of the event
    - c. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory and the officer who is responsible for supervising that officer or employee
  - 8. "Notice" means notice posted on door.
  - 9. "Identify" or "describe," when referring to a person, means you must state the following:
    - a. The full name.
    - b. The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory.
    - c. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory and the officer who is responsible for supervising that officer or employee.
  - 10. "Identify" or "describe," when referring to a document Writ of Possession and Notice on Door, means you must state the following:
    - a. The nature of the document (e.g., letter, handwritten note).
    - b. The title or heading that appears on the document.
    - c. The date of the document and the date of each addendum, supplement, or other addition or change.
    - d. The identities of the author, signer of the document, and person on whose behalf or at whose request or direction the document was prepared or delivered.

e. The present location of the document and the name, address, position or title, and telephone number of the person or persons having custody of the document.

"The Eviction Notice" means the eviction notice and Writ of Possession dated February 5, 2018 that is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

- 11. Identify your Oath of Office
  - a. The date you took the Oath of Office.
  - b. The date of your Oath of Office Bond.
- 12. Identify your Insurance Bond
  - a. The date you got your insurance bond.
  - b. The amount you are covered for on the Insurance Bond.

That is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

### **INTERROGATORIES**

Interrogatory No. 1: Identify the individual completing these responses to Plaintiffs First Set of Interrogatories on behalf of Constable Michael R. Campbell and Writ of Possession

Answer:

Interrogatory No. 2: Describe Delegation of Authority that Constable Michael R. Campbell claims that under the terms of the Appeals Court exclusive to Rule 510.8 identification and orders, authority of the Writ of Possession that allowed you to set all of Sheik Tehuti property of the street.
Answer:
Interrogatory No. 3: Describe Delegation of Authority that Constable Michael R. Campbell claims that under the terms of the U.S. Bankruptcy Court exclusive to Rule 510.8 identification and orders, authority of the Writ of Possession that allowed you to set all of Sheik Tehuti property of the street.
Answer:
Interrogatory No. 4: Describe the delegation of authority for subject matter jurisdiction and connection with Rule 510.8 that do not apply to Constable Michael R. Campbell.
Answer:

of

Interrogatory No. 5: Identify the document and individual(s) who determined that the U.S. Bankruptcy Court claims pending does apply to the property located at 3416 Manordale Court, Forest Hill, Texas does not apply to Constable Deputy J. W. under the orders of Judge Glenn, Article IX of the Plan.

Answer:

Interrogatory No. 6: Identify the Oath of Office Bond and Insurance Bond describing in full the basis for the claims of delegation of authority and subject matter jurisdiction to set Sheik Tehuti property on public streets.

Answer:

Interrogatory No. 7: Identify the Oath of Office and Due Process of Law of the Constitution apply to the property located at 3416 Manordale Court, Forest Hill, Texas 76140, describe the full basis of denial of due process of law and Oath of Office

Article I a. b. Article III Article IV c. Article VII d. Article IX e. Article X f. Article XIV

Answer:

g.

Interrogatory No. 8: Identify the Constables Code of Ethics that did not apply to Sheik Tehuti, the 2nd Court of Appeals and U.S. Bankruptcy Court.

- I shall, at all times, function without prejudice or regard for an individual's race, religion or a. place of birth.
- b. I shall never be a part of an attempt to inhibit or evade the law.

- c. I shall be courteous and maintain self-restraint, scorn, ridicule and contempt.
- d. I recognize my badge of authority as a symbol of the public trust and I recognize that as a law enforcement officer, I shall never bring disgrace upon the people, whose faith and confidence elected me as their Constable.
- e. I recognize my duty to protect the constitutional rights of the people.
- f. I shall never resort to unnecessary force in the performance of my duties
- g. I shall perform my duties expeditiously and promptly and shall transmit an immediate report to those whose work I have accepted.

Answer:

### PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS

To: Constable Michael R. Campbell, Defendant, Justice of Peace Precinct 8.

Pursuant to rule 196 of the Texas Rules of Civil Procedure, you are requested to produce and permit the inspection and copying of each of the items or categories of items identified in the attached Exhibit A. You are to produce these items or categories of items at Justice of the Peace Court Precinct 1 Tarrant County, Texas and P.O. Box 912, Hutchins, Texas 75141 at 2:00 pm on June 15, 2018, or no later than thirty days from the date you receive this request.

Please note that if, after you submit your responses to these requests for production, you learn that any such response was either incomplete when made, or, although complete and correct when made, it is no longer complete and correct, you must amend or supplement your response reasonably promptly after you discover the necessity for such a response. Any amended or supplemental response made less than thirty days before trial will be presumed not to have been made reasonably promptly. A failure to make, amend, or supplement a response in a timely manner may result in your not being able to introduce into evidence the material or information not timely disclosed.

#### **Definitions**

"You" or "your" refers to you, your attorneys, accountants, bookkeepers, agents, employees, and/or

representatives.

"Defendant" means Constable Michael R. Campbell and all agents, employees, and other persons acting on its behalf.

"Documents and tangible things" means the existence, description, nature, custody, condition, location, and contents of papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, data, and data compilations in your possession, custody, or control or known to you or your counsel, whether printed, computerized, microfilmed, reproduced by any other mechanical process or medium of expression, or written or produced by hand and whether or not claimed to be privileged, confidential, or personal, including but not limited to the final versions and all prior drafts of contracts: agreements; notes (including secretarial notes); business records; notebooks; work notes; work papers; communications (including intradepartmental communications and intercompany communications): facsimiles; telecopies; telefaxes; electronic mail; correspondence; statements; reports; telegrams; agendas; forms; memoranda; bulletins; appointment books; logs; messages; diaries; texts; manuals; reference works and materials; samples of materials; depositions; analyses; projections; damage projections; forecasts: statistical statements; financial records; reports; charts; brochures; purchase orders; estimates; computer inputs and outputs; calculations; compilations of data; demonstrative evidence (including physical models, sketches, charts, graphs, plans, drawings, etc.); journals; billings; billing statements and records; receipts; invoices; data compilations; slides; sketches; graphics; charts; movies; videotapes; photographs and the negatives thereof: summaries, records or minutes of meetings or conferences; expressions of statements of policy; lists of people attending meetings or conferences; summaries, records, or reports of personal conversations or investigations: summaries, records, or reports of interviews; and all other writings, and any other similar matter, now or formerly in your possession, custody, or control or that of your counsel or of any other agent, representative, employee, bookkeeper, accountant, expert, or anyone else acting on your behalf, and includes documents used to support any conclusions or opinions reached. Any marginal comments appearing on any documents and any handwritten or other notations on any copy of a document render it original, requiring production of it or a true copy of it with such notations.

"Financial record" means, by way of example and without limitation, the original or true copies of the following items, whether printed, computerized, recorded, or reproduced by any other mechanical process or written or produced by hand: monthly unaudited statements and/or other periodic income and profit and loss statements; periodic balance sheets; financial statements or other statements regarding, relating to, or referring to your financial condition; federal and state income tax returns; volume of sales records; sales tax records and returns; payroll tax records and returns; cash disbursement journal(s); general ledger(s); receipts journal(s); accounts payable journal(s); and accounts receivable journal(s). If you are a partnership or limited partnership the phrase "financial record" also includes partnership agreement(s) and any amendments thereto and forms K-1 provided to the partners. Any marginal comments appearing on any financial record and any handwritten or other notations on any copy of a financial record render it original, requiring production of it or a true copy of it with such notations.

"Relate to" means to name, refer to either directly or indirectly, comment on, analyze, review, report on, form the basis of, be considered in the preparation of, result from, or have any logical relation or relevance to the entity, person, document, event, or action pertaining to the subject matter on which inquiry is made.

"Knowledge" means not only the personal and present knowledge of the person inquired of, but also the present knowledge of any officers, directors, agents, servants, employees, attorneys, and representatives of the person inquired of and information available to them.

"The Claims" means the claims that are the subject of this lawsuit, as alleged in Plaintiff[s'/s] original petition and amended or supplemental petition.

"Statement" is a written statement signed or otherwise adopted or approved by the person making it or a stenographic, mechanical, electrical, or other type of recording, or any transcription thereof that is a substantially verbatim recital of a statement made by the person and contemporaneously recorded.

"The Contract" means the contract for the notice posted on door of the property located at 3416 Manordale Court, Carriage Hill- Forest Hill Block 2 Lot 5. Tarrant County, Texas, that is the subject of this lawsuit.

"The Writ of Possession dated February 5, 2018 that is the subject of this lawsuit, as alleged in Plaintiff First Amended Petition.

"The Property" means the land located at 3416 Manordale Court, Carriage Hill- Forest Hill Block 2 Lot 5. Tarrant County, Texas, that is the subject of this lawsuit.

#### Instructions

If any document or response to these requests is withheld or objected to under a claim of attorneyclient privilege, under a claim of limitation on scope of discovery pursuant to rule 192.4 or 193 of the Texas Rules of Civil Procedure, under a claim of work product pursuant to rule 192.5, under any other qualified privilege, or for any other reason, you are instructed to identify each such document with the following items:

- I. the date of the document;
- 2. the author and addressee(s);
- 3. all persons indicated as recipients of copies;
- 4. all persons known to you to have received the document and/or information or to have learned the substance of its contents;
  - 5. the subject matter of the document and/or response; and
- 6. the specific privilege or objection alleged to be applicable or other reason for its being withheld or not answered.

If you or any of your attorneys, agents, or representatives at any time had possession or control of a document requested and that document has been lost, destroyed, or purged or is not presently in your possession, custody, or control, identify the document and describe the circumstances surrounding the loss, destruction, purge, or separation from your possession, custody, or control, indicating the dates that those circumstances occurred.

If you allege that any request is in any manner ambiguous, you are instructed to describe in detail the reasons for your allegations that the request is ambiguous, including but not limited to each interpretation that you allege the specific request for discovery is subject to. Notwithstanding, you are instructed to respond, to the best of your ability, to the request for production and produce the documents requested.

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If you object to any request, you are instructed to identify, with specificity, the specific procedural rule(s) or substantive laws(s) on which you base your objection.

When producing documents and tangible things responsive to a request, you must either produce them as they are kept in the usual course of business or organize and label them to correspond with the categories in the request.

### REQUESTS FOR PRODUCTION

Request No. 1: Any and all documents relating to the Writ of Notice put on the door at 3416 Manordale Court, Forest Hill, Texas case no. 2017-00654-1, reference to case no. 2017-006596-1 claim against or dispute with Plaintiff.

Response:

Request No. 2: Any and all documents evidence of Writ of Possession of an expired Writ that authorize or delegation of authority to set Sheik Tehuti property on public street.

Response:

Request No. 3: Any and all documents evidencing that TRCP 510.8, rules of law in the State of Texas as related to response no. 2.

Response:

Request No. 4: Any and all documents evidencing of the Appeals Court case no. 02-17-00440-CV pending by Plaintiff is invalid of Rule 510.8 of the TRCP under the rules of law.

Response:

Request No. 5: Any and all documents evidencing the U.S. Bankruptcy Court case no. 1:12-bk-12020 pending is invalid of Judge Glenn order and injunction under the rule of Article IX of the Plan, Rule of Bankruptcy. Response: Request No. 6: Any and all documents evidencing a valid Oath of Office is valid. Response: Request No. 7: Any and all documents evidencing of Oath of Office Insurance in relation and requirement of delegation of authority of certified. Response: Request No.8: Any and all documents evidencing of proof Insurance and any Policy with subject of this litigation. Response

Request No. 9: Any and all documents evidencing and proof of claim you have a claim

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Forest Hill, Texas 76140 to set Sheik Tehuti's personal property on public street.

Response

### PRAYER AND REQUEST

That the record filed in this case no. SC00012857 removed from the Judges files be placed on the record by the clerks, original petition, the judicial notice and the default judgment of none response the subject of this litigation of subject matter jurisdiction and denial of due process void of Thomas Wilder and attorney for Ha To Tu, Attorney Kelly J. Curnutt, that is a violation of the Eleventh Amendment of the Constitution.

UCC 1-308 All Rights Reserved Respectfully submitted,

By: // COA / C Sheik Tehuti (214) 809-8925 P.O. Box 912 Hutchins, TX 75141 sheik.tehuti@yahoo.com

**JURAT** 

Notary Public in and for said State

My Commission expires; 7 - 25 - 202

CC Judge Ralph Swearingen Jr.
District Attorney
Internal Affairs
Court of Appeals
U.S. Bankruptcy Court
Attorney General of Texas
Attorney General of New York
Channel 11 – Justice Seeker

MARY DAVIS
Notary ID #8820886
My Commission Expires
July 25, 2021

A Tehed

Respectfully submitted,

Sheik Tehuti

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Entry of Appearance was served upon Constable Michael R. Campbell Defendant Constable Michael R. Campbell. by first class mail certified return receipt on May 21, 2018