

NO. _____

Plaintiff,

V.

AND
_____, INDIVIDUALLY
Defendants.

§ IN THE DISTRICT COURT
§
§
§ [* _____*] JUDICIAL DISTRICT
§
§
§ OF _____ COUNTY, TEXAS

APPLICATION FOR TURNOVER RELIEF

1. *Parties.* _____, Plaintiff and judgment creditor in this cause, requests that the Court grant this Application for Turnover Relief against _____ and _____, Individually, Defendants and judgment debtors.

2. *Judgment.* Plaintiff recovered judgment against Defendants on _____, _____, in this cause. The judgment remains unsatisfied.

3. *Property Subject to Turnover.* Defendants, _____ and _____, Individually, own property described as [* _____*]. This property cannot readily be attached or levied on by ordinary legal process. This property is not exempt under any statute from attachment, execution, or seizure for the satisfaction of liabilities.

4. *Motion for Turnover.* Plaintiff moves the Court to order Defendants, _____ and _____, Individually, to turn over the property identified above, with all documents and records related to that property, to [* _____*] at [* _____*], on or before [* _____*].

5. *Attorney's Fees.* Plaintiff is entitled to recover reasonable attorney's fees and costs. Reasonable fees for the attorney's services rendered and to be rendered are at least \$[* _____*].

6. This is an attempt to collect a debt. Any information obtained will be used for that

purpose.

7. *Prayer.* Plaintiff prays that the Court-
 - a. set this matter for hearing;
 - b. issue the orders requested in this application;
 - c. grant Plaintiff at least [* _____*] as reasonable attorney's fees;
 - d. grant Plaintiff reasonable expenses incurred in obtaining these orders; and
 - e. grant all further relief to which Plaintiff may be entitled.

Respectfully submitted,

Palmer & Manuel, LLP

By: _____

Jeffrey R. Sandberg
Texas Bar No. 00790051
Campbell Centre I, Suite 1111
8350 North Central Expressway
Dallas, Texas 75206
Tel. (214) 242-6444
Fax. (214) 265-1950
Attorney for Plaintiff

NOTICE OF HEARING

The above motion is set for hearing on _____ at _____.M., in the Judicial District Court
of _____ County, Texas.

Judge or Clerk

CERTIFICATE OF SERVICE

I certify that on the ____ day of _____, _____, a true and correct copy of Plaintiff's Application for Turnover Relief was served by facsimile transmission on _____ at _____.

Jeffrey R. Sandberg