

**Cause No. 2025-95850**

|   |   |                          |
|---|---|--------------------------|
| WILLIS, SCOTT ALLEN,<br>Plaintiff,                                  | § | IN THE DISTRICT COURT OF |
| V.  | § | HARRIS COUNTY, TEXAS     |
| RENDON LEGAL, PLLC and<br>LACI RENDON, Individually,<br>Defendants. | § | 189TH JUDICIAL DISTRICT  |

**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

**TO: RENDON LEGAL, PLLC and LACI RENDON, Individually**  
c/o Registered Agent: Laci Rendon  
415 N. Main  
Highlands, TX 77562

**INSTRUCTIONS**

Pursuant to Rule 198 of the Texas Rules of Civil Procedure, Plaintiff requests that Defendants admit or deny each of the following requests within thirty (30) days of service.

**NOTICE:** Under Rule 198.2, if Defendants fail to serve a written response to these requests within thirty (30) days, each matter of which an admission is requested will be deemed admitted.

**REQUESTS FOR ADMISSION**

**REQUEST NO. 1:** Admit that you hold a Texas Real Estate Commission (TREC) license.

**REQUEST NO. 2:** Admit that service on Scott Allen Willis on April 7, 2024 was successful.

**REQUEST NO. 3:** Admit that a default judgment was entered against Scott Allen Willis in SAPCR Case No. 202417675 on August 20, 2024.

**REQUEST NO. 4:** Admit that you received an email from Scott Allen Willis on or about April 28, 2024.

**REQUEST NO. 5:** Admit that you are the Broker/Owner of Real Estate Dreams.

**REQUEST NO. 6:** Admit that you filed a Certificate of Last Known Address in SAPCR Case No. 202417675 on July 19, 2024.

**REQUEST NO. 7:** Admit that April 7, 2024 was 103 days before you filed the Certificate of Last Known Address on July 19, 2024.

**REQUEST NO. 8:** Admit that Scott Allen Willis appeared at trial in Habeas Corpus Case No. 202353496 on June 3, 2024.

**REQUEST NO. 9:** Admit that you did not respond to any email from Scott Allen Willis.

**REQUEST NO. 10:** Admit that you knew in advance that Scott Allen Willis would be at the Baytown hotel on April 7, 2024.

**REQUEST NO. 11:** Admit that you received an email from Scott Allen Willis on or about May 9, 2024.

**REQUEST NO. 12:** Admit that Habeas Corpus Case No. 202353496 was pending in Harris County at the same time as SAPCR Case No. 202417675.

**REQUEST NO. 13:** Admit that Real Estate Dreams operates from the same address as Rendon Legal, PLLC.

**REQUEST NO. 14:** Admit that in the Certificate filed July 19, 2024, you certified under oath that Scott Allen Willis's last known address was "10202 Challanger 7 Dr, 604, Jacinto City, TX 77029."

**REQUEST NO. 15:** Admit that Scott Allen Willis was served at a hotel in Baytown, Texas on April 7, 2024.

**REQUEST NO. 16:** Admit that Scott Allen Willis had no actual notice of the SAPCR proceedings before the default judgment was entered.

**REQUEST NO. 17:** Admit that you received an email from Scott Allen Willis on or about April 30, 2024.

**REQUEST NO. 18:** Admit that Laci Rendon signed the Certificate of Last Known Address filed July 19, 2024.

**REQUEST NO. 19:** Admit that Elizabeth Alvarado was the petitioner in Habeas Corpus Case No. 202353496.

**REQUEST NO. 20:** Admit that you have earned real estate commissions since January 1, 2023.

**REQUEST NO. 21:** Admit that June 3, 2024 was 46 days before you filed the Certificate of Last Known Address on July 19, 2024.

**REQUEST NO. 22:** Admit that you had no evidence that Scott Allen Willis resided at 10202 Challanger 7 Dr, Jacinto City, TX 77029 in 2024.

**REQUEST NO. 23:** Admit that the emails from Scott Allen Willis provided you with his contact information.

**REQUEST NO. 24:** Admit that based on the Certificate you filed, the court authorized service on Scott Allen Willis by posting and publication.

**REQUEST NO. 25:** Admit that Elizabeth Alvarado provided you with Scott Allen Willis's email address prior to July 19, 2024.

**REQUEST NO. 26:** Admit that you caused Scott Allen Willis to be served with the SAPCR petition on April 7, 2024.

**REQUEST NO. 27:** Admit that Habeas Corpus Case No. 202353496 listed Scott Allen Willis's address as 8918 Heaton St, New Orleans, LA 70118.

**REQUEST NO. 28:** Admit that you did not verify that Scott Allen Willis resided at 10202 Challanger 7 Dr, Jacinto City, TX 77029 before filing the Certificate.

**REQUEST NO. 29:** Admit the genuineness of the Certificate of Last Known Address filed in SAPCR Case No. 202417675 on July 19, 2024, a true and correct copy of which is on file with the Harris County District Clerk.

**REQUEST NO. 30:** Admit that Scott Allen Willis did not reside at 10202 Challanger 7 Dr, Jacinto City, TX 77029 at any time after December 31, 2013.

**REQUEST NO. 31:** Admit that neither you nor Elizabeth Alvarado disclosed the existence of the Final Order to Scott Allen Willis until October 16, 2025.

Respectfully submitted,



**SCOTT ALLEN WILLIS**

Plaintiff, Pro Se

2111 Old Holzwarth Road, Unit 0702

Spring, Texas 77388

Telephone: (713) 469-2918

Email: iamnotcheckingit@gmail.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served on Defendants Rendon Legal, PLLC and Laci Rendon, Individually, at 415 N. Main, Highlands, TX 77562, by email to laci@rendonlegal.com and rendonlaw@outlook.com on \_\_\_\_\_, 2025.



**SCOTT ALLEN WILLIS**