

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA.**

CAUSE NO. 2023-53496

EX PARTE	§	IN THE DISTRICT COURT
	§	
AND	§	311TH JUDICIAL DISTRICT
	§	
	§	
MINOR CHILDREN	§	HARRIS COUNTY, TEXAS

AMENDED PETITION FOR WRIT OF HABEAS CORPUS AND ATTACHMENT

Pursuant to Chapter 157, Subchapter H of the Texas Family Code, Elizabeth Alvarado, Relator, files this Petition for Writ of Habeas Corpus against Scott Allen Willis, Respondent, for illegally restraining [REDACTED] and [REDACTED].

Discovery

1. Pursuant to Rule 190 of the Texas Rules of Civil Procedure, discovery is intended to be conducted in this suit under Level 2.

Parties

2. Elizabeth Alvarado. The last three numbers of Elizabeth Alvarado's Texas driver's license number are 884. The last three numbers of Elizabeth Alvarado's Social Security number are 924.

3. Scott Allen Willis. Scott Allen Willis does not have a driver's license number. The last three numbers of Scott Allen Willis's Social Security number are 335.

Children of the Suit

4. The following children are subject to this suit:

Name	Sex	Birth Date
[REDACTED]	Male	[REDACTED]
Name	Sex	Birth Date
[REDACTED]	Female	[REDACTED]

Service of Citation

Elizabeth Alvarado requests service of citation on Scott Allen Willis at 8918 Heaton St., New Orleans, LA 70118 or anywhere found.

Jurisdiction

5. This Court has continuing, exclusive jurisdiction over the parties in this suit.

Court Order in Effect

6. There are no court orders in effect authorizing Scott Allen Willis to have possession of the child. The parties were not married at the time of the birth of the child. Scott Allen Willis has not been adjudicated the father of the child.

Illegal Restraint

Scott Allen Willis is illegally restraining [REDACTED] from the possession of Elizabeth Alvarado. The children are located at 8918 Heaton St., New Orleans, LA 70118

Writ of Habeas Corpus

7. Elizabeth Alvarado petitions the Court to issue a writ of habeas corpus commanding law enforcement officials to take possession of [REDACTED] for delivery to this court and to compel the return of the child to Elizabeth Alvarado's possession.

Attorney Fees and Costs

8. Elizabeth Alvarado engaged Samuel L. Milledge, a licensed attorney, to prepare and prosecute this suit for the safety and welfare of the child. Elizabeth Alvarado petitions this Court to render judgment for reasonable attorney's fees, expenses and costs through trial and appeal in Elizabeth Alvarado's favor and against Scott Allen Willis, and order the judgment to be paid directly to Samuel L. Milledge. Elizabeth Alvarado petitions the Court to award post-judgment interest as permitted by law.

Prayer

Elizabeth Alvarado prays the Court to issue a Writ of Habeas Corpus as requested above and for general relief.

Respectfully submitted,

The Milledge Law Firm, PLLC
2950 North Loop West, Suite 500
Houston, Texas 77092

/s/ Samuel L. Milledge

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STATE OF TEXAS

§

COUNTY OF HARRIS

§

UNSWORN DECLARATION

"My name is Elizabeth Alvarado. My date of birth is September 8, 1984, and my address is 16601 Market St, Channelview, TX 77530, I declare under penalty of perjury that the foregoing is true and correct.

Executed in Houston, Harris County, State of Texas, on the 14th day of August 2023


ELIZABETH ALVARADO

Automated Certificate of eService

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Samuel Milledge on behalf of Samuel Milledge

Bar No. 14055300

milledge@milledgelawfirm.com

Envelope ID: 82888343

Filing Code Description: Amended Filing

Filing Description: Amended Petition for Writ of Habeas Corpus and Attachment

Status as of 12/27/2023 1:36 PM CST

Case Contacts

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