

Cause No. 2025-95850

WILLIS, SCOTT ALLEN, Plaintiff,	§	IN THE DISTRICT COURT OF
	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
RENDON LEGAL, PLLC and LACI RENDON, Individually, 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 Challenger 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 Challenger 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 Challenger 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 Challenger 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