

NO. _____

_____	§	IN THE COUNTY COURT AT LAW
(Plaintiff)	§	
VS	§	OF
_____	§	
(Defendant)	§	WALKER COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, _____ ("plaintiff") filing this *Original Petition* requesting the court order defendant to issue a Certificate of Title to the plaintiff on a _____ (the "vehicle") and for cause of action would show:

1. Plaintiff is an individual residing in Walker County, Texas.
2. Defendant is _____, who resides or does business at _____.
3. The Texas Department of Motor Vehicles ("defendant or TxDMV") is a public agency and may be served with informal process by serving a representative with the Associate General Counsel, Office of General Counsel, 4000 Jackson Avenue, Austin, Texas 78731.
4. This action involves the refusal of the defendant to obtain a Certificate of Title to the vehicle lawfully purchased by plaintiff.
5. Plaintiff is unable to comply with the standard requirements of the TxDMV to produce the required paperwork necessary to apply for title because _____

6. If the normally required documents cannot be obtained, the TxDMV requires that a court order be obtained from a County Court at Law or a District Court. This is the basis of this lawsuit.

7. Plaintiff has diligently attempted to obtain a Certificate of Title to the vehicle from defendant but has been unable to do so.

WHEREFORE, PREMISES CONSIDERED, plaintiff respectfully prays that the defendant be ordered to obtain title to the vehicle in plaintiff's name, and/or that TxDMV be ordered to issue a title to the vehicle in plaintiff's name, and/or that all other titles to the vehicle be cancelled and/or that all pending title applications for the vehicle be rejected.

Respectfully submitted,

Pro Se Plaintiff

Printed name: _____

Address: _____

City, State, Zip: _____

Phone: _____

Email: _____