

2015. Goforth Decl. ¶3. The executed service of the Summons and Complaint upon Defendant was filed with the Court on February 23, 2015. Doc. # 11.

2. Defendant has not filed an answer to the Complaint or otherwise defended in this civil action. Goforth Decl. ¶4.

3. Defendant is not an infant, nor incompetent. *Id.* at ¶5. Defendant is not eligible for relief under the Servicemembers Civil Relief Act of 2003 [50 U.S.C. Appendix, § 501 *et seq.*]. *Id.*

WHEREFORE, premises considered, the Receiver requests that the Clerk of this Court enter default against Defendant West Houston WB Realty Fund, L.P.

Dated: February 24, 2015

Respectfully submitted,

THE TAYLOR LAW OFFICES, P.C.

By: /s/ Andrew M. Goforth

Andrew M. Goforth
Texas State Bar: 24076405
goforth@tltaylorlaw.com

4550 Post Oak Place Drive, Suite 241
Houston, Texas 77027
Tel: (713) 626-5300
Fax: (713) 402-6154

COUNSEL FOR RECEIVER

CERTIFICATE OF SERVICE

On February 24, 2015, I served the foregoing document on all parties as listed below by U.S. Mail, Return Receipt Requested, pursuant to Federal Rule of Civil Procedure 5(b)(2)(C).

Via U.S. Mail, Return Receipt Requested:

David G. Wallace

1634 Brookstone Ln.
Sugar Land, TX 77479

Costa Bajjali

2911 Waters Lake Ln.
Missouri City, TX 77459

Laffer Frishberg Wallace Economic Opportunity Fund, L.P. d/b/a LFW Economic Opportunity Fund

c/o David G. Wallace, registered agent
1634 Brookstone Ln.
Sugar Land, TX 77479

West Houston WB Realty Fund, L.P.

c/o David G. Wallace, registered agent
1634 Brookstone Ln.
Sugar Land, TX 77479

/s/ Andrew M. Goforth
Andrew M. Goforth

Exhibit A

2. The Receiver filed a Complaint against Defendant on January 29, 2015, seeking a judgment against Defendant for damages caused by Defendant's breaches of three contracts. Doc. # 1.

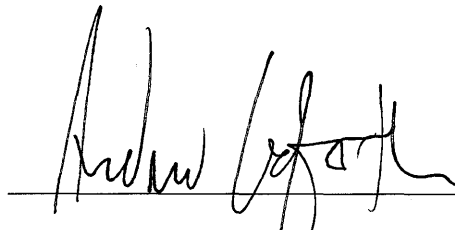
3. Defendant was served with the Summons and Complaint on February 2, 2015. Doc. # 11. The executed service of Summons and Complaint was filed with this Court on February 23, 2015. *Id.*

4. Defendant has not filed an answer to the Complaint or otherwise defended in this civil action.

5. Defendant is not an infant, nor incompetent. Defendant is not eligible for relief under the Servicemembers Civil Relief Act of 2003 [50 U.S.C. Appendix, §501 et seq.].

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24, 2014

A handwritten signature in black ink, appearing to read "Andrew M. Goforth", is written over a horizontal line.

Andrew M. Goforth
Counsel for Plaintiff
Receiver Thomas L. Taylor III