Tracking Number: E0188871

Case Number: 253100018649

Pamela Richardson	§	In the Justice Court
Plaintiff	Š	Harris County, Texas
VS.	Š	Precinct 3, Place 1
Qijah Sheryl James	Š	14350 Wallisville Road, Suite 102
Defendant	Š	Courtroom Suite 104
	Š	Houston Texas 77049
	Š	713-274-0760
	•	www.jp.hctx.net

Citation (Small Claims Case)

THE STATE OF TEXAS COUNTY OF HARRIS

TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT, OTHER PERSON AUTHORIZED BY COURT ORDER, OR CLERK:

Deliver this citation, together with a copy of the petition, to:

Qijah Sheryl James 2613 Emancipation Avenue Houston TX 77004 Phone Number:

#### TO THE DEFENDANT:

You have been sued. You are commanded to appear by filing a written answer to the petition filed by Plaintiff with the Clerk of the Court on or before the end of the 14<sup>th</sup> day after the date of service of this citation. In your answer, please provide an email address if you consent to email service of any pleadings or other documents in your case. If you fail to file an answer as required, a judgment by default may be rendered for the relief demanded in the petition.

Date Petition Filed: 01/14/2025

Nature of demand made by Plaintiff(s): money owed in the amount of \$20,000.00. A copy of the petition is attached.

#### **Notice**

You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14<sup>th</sup> day after the day you were served with these papers. If the 14<sup>th</sup> day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14<sup>th</sup> day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult the Texas Rules of Civil Procedure, Part V, Rules of Practice in Justice Courts. A copy of the Rules is available at <a href="http://www.jp.hctx.net/">http://www.jp.hctx.net/</a> or at the Justice Court.

Date: 1/14/2025

The state of the s

/s/ Tamara Broussard
Clerk of the Court
Harris County Justice Court
Precinct 3, Place 1

Address of Plaintiff

5006 Nichols St Houston TX 77020 Address of Plaintiff's Attorney

Page 1 of 1 Revised: 06/09/2016

Pamela Richardson	§	In the Justice Court
Plaintiff(s)	§	Harris County, Texas
VS	§	Precinct 3, Place 1
Qijah Sheryl James	§	14350 Wallisville Road, Suite 102
Defendant(s)	§	Courtroom Suite 104
. ,	§	Houston Texas 77049
	<u> </u>	713-274-0760
	•	www.ip.hctx.net

Pamela Richardson 5006 Nichols St Houston TX 77020

#### Notice of Hearing on Motion to Transfer of Venue

You are hereby notified that a hearing on the Defendant's Motion to Transfer Venue because of improper venue in this Justice Court is scheduled on April 9, 2025 Motion Docket 8:30 AM. You may appear either in-person in the courtroom or remotely via Zoom using the following instructions.

## Appearance Instructions via Zoom:

The Plaintiff may file a response to the Defendant's Motion to Transfer Venue. The parties may present evidence at the hearing.

If the motion is granted, the judge will sign an order designating the court to which the case will be transferred. If the motion is denied, the case will be heard in this Court.

If the case is transferred to another county, the Plaintiff will be notified to pay the filing fee in the court to which the case is transferred. The Plaintiff has 14 days after receiving the notice to pay the filing fee. There is no refund of any fees already paid. Failure to pay the filing fees will result in dismissal of the case without prejudice.

There is no motion for rehearing, and there is no interlocutory appeal of the ruling on venue.

Date: 2/19/2025



/s/ Kimberly King
Clerk of the Court
Justice Court Precinct 3, Place 1

Appropriate courtroom attire is required. Please visit the Court website or contact the Court for specific details.

The court may allow or require a participant to appear at certain court proceedings remotely, such as by videoconference or teleconference. Please check with the court for further information on how to make such a request

Pamela Richardson Plaintiff vs. Qijah Sheryl James	999	In the Justice Court Harris County, Texas Precinct 3, Place 1 14350 Wallisville Road, Suite 102
Defendant	9 9 9	Courtroom Suite 104 Houston Texas 77049 713-274-0760 www.jp.hctx.net

### ORDER GRANTING MOTION TO TRANSFER OF VENUE

On 5/21/2025, the Motion to Transfer Venue was heard. Plaintiff, Pamela Richardson, appeared in person and by attorney of record or by agent or by representative assisting Plaintiff. Defendant, Qijah Sheryl James, appeared in person and by attorney of record or and by agent or by representative assisting Defendant.

The Court, having considered the evidence and testimony, finds that the Motion should be granted for the following reasons:

Defendant, Qijah Sheryl James, lives in Precinct 7 and incident occurred in Precinct 7.

It is ORDERED that this proceeding is transferred to the Harris County Justice Court, Precinct 7, Place 2, and a true and correct transcript of the proceedings, a certified copy of the bill of costs, and the original papers in the case will be sent to the Court.

Signed on: 5/21/2025

Justice of the Peace Precinct 3, Place 1

Pamela Richardson	§	In the Justice Court
Plaintiff(s)	§	Harris County, Texas
VS	§	Precinct 3, Place 1
Qijah Sheryl James	§	14350 Wallisville Road, Suite 102
Defendant(s)	§	Courtroom Suite 104
. ,	§	Houston Texas 77049
	<u> </u>	713-274-0760
	•	www.ip.hctx.net

Qijah Sheryl James 2613 Emancipation Avenue Houston TX 77004

#### Notice of Hearing on Motion to Transfer of Venue

You are hereby notified that a hearing on the Defendant's Motion to Transfer Venue because of improper venue in this Justice Court is scheduled on April 9, 2025 Motion Docket 8:30 AM. You may appear either in-person in the courtroom or remotely via Zoom using the following instructions.

## Appearance Instructions via Zoom:

The Plaintiff may file a response to the Defendant's Motion to Transfer Venue. The parties may present evidence at the hearing.

If the motion is granted, the judge will sign an order designating the court to which the case will be transferred. If the motion is denied, the case will be heard in this Court.

If the case is transferred to another county, the Plaintiff will be notified to pay the filing fee in the court to which the case is transferred. The Plaintiff has 14 days after receiving the notice to pay the filing fee. There is no refund of any fees already paid. Failure to pay the filing fees will result in dismissal of the case without prejudice.

There is no motion for rehearing, and there is no interlocutory appeal of the ruling on venue.

Date: 2/19/2025



/s/ Kimberly King
Clerk of the Court
Justice Court Precinct 3, Place 1

Appropriate courtroom attire is required. Please visit the Court website or contact the Court for specific details.

The court may allow or require a participant to appear at certain court proceedings remotely, such as by videoconference or teleconference. Please check with the court for further information on how to make such a request

Instructions: Venue is the place where the lawsuit should be filed. Generally, in Justice Court, proper venue is the county and precinct in which one or more defendants reside, the county and precinct where the incident that gave rise to the claim occurred, the county and precinct where the contract, if any, that gave rise to the claim was to be performed, or in a suit to recover personal property, the county and precinct where the property is located. The justices of the peace in each county are allowed to adopt local rules regarding the transfer of a pending case from one precinct to a different precinct.

Venue may be proper, but a party may believe that a fair trial in a specific precinct or before a specific judge is not possible.

A motion to transfer venue must be filed before trial, but no later than 21 days after the defendant's answer is filed. The motion must contain a sworn statement that the venue chosen by the plaintiff is improper and state the specific county and precinct of proper venue.

Venue provisions may be found in Chapter 15, Subchapter E of the Texas Civil Practice and Remedies Code which is available online and for examination during the Court's business hours. Rule 502.4

	NO.	253100018649	
_	PAMELA RICHARDSON PLAINTIFF(S)  Shery James DEFENDANT(S)	§ IN THE JUSTICE COURT § HARRIS COUNTY, TEXAS § PRECINCT 3 PLACE / § § § § JI	FEB 19 2025 UDGE JOE STEPHENS TEXAS
	MOTION TO	O TRANSFER VENUE	A A A A A A A A A A A A A A A A A A A
Judge_	+ -/ (	ace <u>2</u> , because the venue chosen by	the Plaintiff is improper
-	Respect	fully,	
	Telepho	Name: Sheryl JA 5: 2613 EMANCIF 2613 CMANCIF 2613 CMANCIF	
	DECLARAT	TION OF DEFENDANT	
	Name: Shem James Address: 2613 Emanci PA7im declare under penalty of perjury that the informatio	·	
	Executed in <u>Harris</u> County, Texas, on <u>F</u>		

(Include Certificate of Service)

## **Broussard, Tamara (JP)**

From: perm free <permfree@gmail.com>

Sent: Thursday, April 3, 2025 3:25 PM

To: MyJP31

Subject: RE: Needing to file motion for a continuance due to an urgent family matter

### Dear District Clerk,

My name is Shery James, i am the defendant in case number 253100018649. I am writing to request a continuance/rescheduling of my case due to an urgent family matter.

I am asking you to reschedule the case because we are suspecting a mismanagement of the completion of the renovation of my fathers house in Jamaica, and i must go immediately to rectify the issue, so that there will not be a delay in completion before hurricane season and my father will not be unhoused after his cancer treatment.

This situation has caught me off guard, and i would not have asked for a continuance, but for this alarming issue. Even though the meeting is by zoom, the island often has power outages and other electrical inconveniences that i do not want to chance affecting my hearing.

I would like to request a new haring date of may 7 th or 12th if possible.

Thank you for your consideration. I understand, that this could possibly cause an inconvenience. If you have any questions, you can reach out, or send a response at this email.

Sincerely, Sheryl

RECEIVED

APR 0 3 2025
JUDGE JOE STEPHENS
JP 3-1 HARRIS COUNTY
TEXAS

RECEIVED OR FILED
JUSTICE OF THE PEACE 3-1
HARRIS COUNTY, TEXAS

This Document is Both an Answer

Instructions: A written answer to a lawsuit must be filed with the court and a copy served on the plaintiff. An answer that denies all of the allegations in the petition is sufficient and will not prevent the defendant from raising any defenses at trial.

The answer is due by the end of the 14<sup>th</sup> day after the date of service of the citation and petition, but if the 14<sup>th</sup> day is a Saturday, Sunday, or legal

The answer is due by the end of the 14<sup>th</sup> day after the date of service of the citation and petition, but if the 14<sup>th</sup> day is a Saturday, Sunday, or legal holiday, the answer is due on the next day that is not a Saturday, Sunday, or legal holiday; and if the 14<sup>th</sup> day falls on a day during which the court is closed before 5:00 p.m., the answer is due on the court's next business day. **Rule 502.5**.

0	NO. 25	3100018649
PAMELA Richardso.	§ 8	IN THE JUSTICE COURT OF HARRIS COUNTY, TEXAS
PLAINTIFF VS.	§	PRECINCT 3 PLACE 1
SHERYL JAMES	\$ \$ 8	
DEFENDANT	§	

## **DEFENDANT'S ANSWER (SMALL CLAIMS OR DEBT CLAIM CASE)**

This Answer is made by Shery L	A MES	, Defendant.
Defendant denies all of the Plaintiff's allegations and	demand that the allegations be proven.	
Other Answer (describe other defenses, if any):  eViolence That the Plaint  or her have to be cut, I  event that charges cannot B.	Tee attached file iff PAmela Richa Also issued a count	rdson agreed edam. In the
Respectfully submitted,  Signature of Defendant	Request +	that the case
Printed Name: Address: Telephone: Fax Number:		claim honored
PRD Se		

Signature of Attorney for Defendant

Printed Name: State Bar No.: Address:

Telephone: Fax Number:

Defendant consents to email service of all motions, pleadings, and other documents filed in this proceeding to be delivered to the following e-mail address: BIN IEGAL MATTERS @ gmail & Com

I heachy certify that on the 18 day of Feb 2025, a true and correct copy of the foregoing instrument was forwarded by certified mail or email to the Plaintiff

## **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 97521464

Filing Code Description: Answer Filed

Filing Description: This document serves as both an answer and

counterclaim - ANSWER ONLY Status as of 2/19/2025 8:57 AM CST

**Case Contacts** 

Name	BarNumber	Email	TimestampSubmitted	Status
Pamela Richardson		pammyrich12309@gmail.com	2/18/2025 7:14:52 PM	SENT

Small Claims Petition	2001/21/1/
NO 2031	20018 649
Pamela Richardson & Int	the Justice Court of Harris County, Texas
	ecinct 3 Place 1
vs. § Ju	dge Joe Stephens
Girah Shenyl James	350 Wallisville Road, Suite 102
Defendant(s) § Ho	puston, TX 77049
Plaintiff: Pamela Richardson	
Describe the legal nature of the plaintiff (e.g., individual, sole proprietorship, partnership,	ership, corporation)
Defendant: Qirah Shery James	
Address: <u>db73</u> Emancipation Avenue City: Houston State: TV 2	
State, 12 Z	ip: 77004 Date of Birth (fapplicable):
Describe the legal nature of the defendant (e.g., individual, sole proprietorship, particularly Shery) James Book to	mership, corporation)  Noture PR
(state the name of the defendant if defendant is an individual, or state the name and if the defendant if defendant is a partnership, limited partnership, corporation, or least the address for service of process.)  The defendant's usual place of business or residence, or other place where defendant Avenue	imitea itability company), who may be served at
Cause of Action (State the cause of action in plain and concise language, sufficient to give fair notice defendant to prepare a defense. You may include information showing venue is propyou are seeking personal property, you must describe the property and state the value for cutting my dread loss with a sufficient of my life.	
Relief Requested (Describe the relief you are requesting, itemizing the amount of a 20,000, I really want her to do	damages you are seeking.) O sail time
Respectfully submitted,  Polls Respectfully submitted,  Printed N Signature of Plaintiff or Plaintiff's Attorney of Record  Address: 500 b Nicols St. Houston	No
829-716-HMM	Texas 77020
E-Mail Address: <u>Pammyrich 19309@gmail.</u> Cov	
Plaintiff consents to the e-mail service of the answer and any other mail	o o u los dis Distration de 11 de 11
Plaintiff consents to the e-mail service of the answer and any other motion	s or pleadings to this mail address.

JAN 1 4 2025
JUDGE JOE STEPHENS
JP 3-1 HARRIS COUNTY
TEXAS

This notice must be filed at or before the time the default judgment is signed. The clerk must immediately mail written notice of the default judgment to the defendant at the address provided. Rule 503.1 Before entering a default judgment against an individual defendant, the plaintiff must also file with the court a Military Status Affidavit. IN THE JUSTICE COURT OF HARRIS COUNTY, TEXAS PLAINTIFF(S PRECINCT 3 PLACE 1 Judge Joe Stephens 14350 Wallisville Road, Suite 102 Houston, TX 77049 DEFENDANT(S) NOTICE OF DEFENDANT'S LAST KNOWN MAILING ADDRESS The undersigned certifies that the last known mailing address of the defendant against whom a default judgment is taken in this case is: Defendant's name: Diah Defendant's last known mailing address: Submitted on 1-14/25 (Signature of Plaintiff or Plaintiff's Attorney of Record Printed Name: Panela Address: Telephone: Fax:

Instruction: A plaintiff requesting a default judgment must provide to the Clerk in writing the last known mailing address of the defendant.

RECEIVED

JAN 14 2025

JUDGE JOE STEPHENS
TEXAS

Instructions: The Servicemembers Civil Relief Act applies to a civil proceeding in the Justice Courts. Before entering a default judgment against an individual defendant, the plaintiff must file with the court an affidavit stating whether or not the defendant is in the military service, showing necessary facts to support the affidavit, or stating that the plaintiff is unable to determine whether or not the defendant is in military service, if that is the case. The requirement for an affidavit may be satisfied by a written, signed document declared to be true under penalty of represent the defendant. If the court is unable to determine if the defendant is in military service, the court may require plaintiff to file a bond in an amount approved by the court.

an another approved by the court.

A person who makes or uses an affidavit under this Act knowing it to be false, may be fined or imprisoned or both. 50 U.S.C. App. 501 et seq. To obtain certificates of service or non-service under the Servicemembers' Civil Relief Act, you may access the public website: <a href="https://scra.dimdc.osd.mil/scra/#/home">https://scra.dimdc.osd.mil/scra/#/home</a>. This website will provide the current active military status of an individual.

Military Status Affidavit	
Case No	§ In the Justice Court of
Plaintiff Plaintiff	§ Harris County, Texas
Ough Shery James Defendant	§ Precinct 3, Place 1
BEFORE ME, on this day personally appeared, Dowlow, who, under penalty of perjury, stated that the following facts are	e true:
I am the Plaintiff attorney of record for the Plaintiff i	n this proceeding.
□,De	fendant, is not in military service.
□, De	fendant, is in military service.
I know this because	,
I am unable to determine whether or not the Defendant is in	military service.
P A T F	ignature rinted Name: Pamela Richardson Address: 500 b Nichols St Houston Texas elephone: 832-715-4,550 ax: Damyrich 12309 Ogmail.com -Mail Address:
COUNTY OF HARRIS §	
SWORN TO AND SUBSCRIBED BEFORE ME on	
Slerk of the Court	
Clerk of the Court RECEIVE	NOTARY PUBLIC, State of Texas
Clerk of the Court RECEIVE  JAN 1 4 2025	

JAN 1 4 2025
JUDGE JOE STEPHENS
JP 3-1 HARRIS COUNTY
TEXAS

Strand STALL

CAUSE NUMBER: 253100018649

TRACKING NUMBER: E0188871
JUSTICE OF THE PEACE 3-1

PLAINTIFF: Richardson, Pamela

VS

DEFENDANT: James, Qijah Sheryl

Constable James "Smokie" Phillips,

Jr 5290 Griggs Road Houston Texas

RECEIVED

AFFIDAVIT

FEB 1 1 2025

JUDGE JOE STEPHENS JP 3-1 HARRIS COUNTY TEXAS

THE STATE OF TEXAS COUNTY OF HARRIS

BEFORE ME, the undersigned authority, a notary Public in and for the State of Texas, on this day personally appeared D TA, who being by me duly sworn, upon his oath deposes and says:

I am over the age of 21 years, of sound mind, and fully competent to testify as to the matters stated herein. I hold the office of Deputy Constable of Harris County, Texas and I have personal knowledge of every statement herein made, and I am fully competent to testify as to the matters stated herein.

It is impractical to secure service of Citation on the defendant: James, Qijah Sheryl in the above numbered and entitled cause, by delivering to said Defendant, in person, a true copy of the Citation with the date of delivery endorsed thereon with a copy of the SMALL CLAIMS PETITION attached thereto, because he, she, they absents or secrets himself, herself, or otherwise evades such service each time I have attempted to effect such service on him, her, in this cause.

The defendant's usual place of ABODE (or the place where the said Defendant can probably be found) is 2613 EMANCIPATION AVE, HOUSTON, TX 77004.

I have attempted service on said Defendant by attempting to deliver to him or her, in person, a true copy of the Citation with the date of delivery endorsed thereon with a copy of the SMALL CLAIMS PETITION attached thereto at the said place above described on the following dates and at the following times but I have not been successful;

Request Service By \_\_\_\_\_\_ Affixing Citation to Door OR \_\_\_\_\_\_ Delivering to Anyone (16) Years of Age or Older (check one)

Date	Time	Result	Comments
2/4/2025	1:24PM	No Answer	RTC FOR RULE 501.2E
1/27/2025	7:47 <b>AM</b>	No Answer/Left Card	CARD GONE - LEFT ANOTHER CARD - RESP 'S CARD (TXPL# PKT 8006) - LEFT THE SIDE OF THIS PROPERTY - AND PARKED AT DRIVE WAY OF - THE PROPERTY
1/23/2025	3:00PM	No Answer/Left Card	CARD GONE - LEFT ANOTHER CARD - RESP 'S CAR (TXPL# PKT 8006) MOVED AND PARKED ON THE SIDE OF THE PROPERTY
1/22/2025	8:28AM	No Answer/Left Card	CARD GONE - LEFT ANOTHER CARD - RESP'S CAR (TXPT# PKT 8006) IS PARKING AT DRIVEWAY
1/17/2025	12:11PM	No Answer/Left Card	PROPERTY SECURITY FENCE AROUND THE PROPERTY - DEPUTY WAS UNABLE TO ACCESS INSIDE TO THE FRONT DOOR BUT MAIL BOX IS (AT THE FENCE - MAILS IS UNDER RESP'S NAME

,	,	
	•	

Every item in this, my affidavit, is true and correct. Further Affiant sayeth not.

Deputy Signature

James "Smokie" Phillips, Jr, Constable Pct 7, Harris County

SWORN AND SUBSCRIBED BEFORE ME, the undersigned authority, by  $\underline{D\ TA}$ , Affiant, on this the  $\underline{5}$  day of  $\underline{February}$ ,  $\underline{2025}$ , to which I certify my hand and seal of office.

Notary Public in and for the State of Texas

Dwight Monroe Tolbert
My Commission Ex, ires
4/29/200

(713) 480 - 389

Citation - Small Claims Money Damages

PKT-8006

Case Number: 253100018649

Pamela Richardson

Plaintiff vs

Qijah Sheryl James

Defendant

~ ~ ~

In the Justice Court Harris County, Texas Precinct 3, Place 1

14350 Wallisville Road, Suite 102

Tracking Number: E0188871

Courtroom Suite 104 Houston Texas 77049 713-274-0760

www.jp.hctx.net

Citation (Small Claims Case)

THE STATE OF TEXAS COUNTY OF HARRIS

TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT, OTHER PERSON AUTHORIZED BY COURT ORDER, OR CLERK:

Deliver this citation, together with a copy of the petition, to:

Qijah Sheryl James 2613 Emancipation Avenue Houston TX 77004 Phone Number:

#### TO THE DEFENDANT:

You have been sued. You are commanded to appear by filing a written answer to the petition filed by Plaintiff with the Clerk of the Court on or before the end of the 14<sup>th</sup> day after the date of service of this citation. In your answer, please provide an email address if you consent to email service of any pleadings or other documents in your case. If you fail to file an answer as required, a judgment by default may be rendered for the relief demanded in the petition.

Date Petition Filed: 01/14/2025

Nature of demand made by Plaintiff(s): money owed in the amount of \$20,000.00. A copy of the petition is attached.

### Notice

You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14<sup>th</sup> day after the day you were served with these papers. If the 14<sup>th</sup> day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14<sup>th</sup> day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult the Texas Rules of Civil Procedure, Part V, Rules of Practice in Justice Courts. A copy of the Rules is available at http://www.ip.hctx.net/ or at the Justice Court.

Date: 1/14/2025

A CONTRACTOR OF THE PARTY OF TH

/s/ Tamara Broussard

Clerk of the Court Harris County Justice Court Precinct 3, Place 1

Address of Plaintiff's Attorney

Address of Plaintiff

5006 Nichols St Houston TX 77020

10:07A 1/17 - Maile. 2:12 1/22 Maile.

Revised: 06/09/2016

Pamela Richardson	§	In the Justice Court
Plaintiff	Š	Harris County, Texas
VS.	Š	Precinct 3, Place 1
Qijah Sheryl James	§	14350 Wallisville Road, Suite 102
Defendant	Ş	Courtroom Suite 104
	Š	Houston Texas 77049
	Š	713-274-0760
	Ç	www.jp.hctx.net

### ORDER AUTHORIZING ALTERNATIVE SERVICE (SMALL CLAIMS OR DEBT CLAIM CASE)

The Court, having reviewed the request for alternative service, finds that the following address is the Defendant's residence address or other place where the Defendant can probably be found and authorizes service of process in this proceeding on Defendant, Qijah Sheryl James by leaving a copy of the citation with petition attached at 2613 Emancipation Ave, Houston, TX 77004, the Defendant's residence address or other place where the Defendant can probably be found, with any person found there who is at least 16 years of age, or by affixing to the front entry way at 2613 Emancipation Ave, Houston, TX 77004or if property is surrounded by a fence and gate, by affixing to the gate of said property and immediately mailing a copy of the citation with a copy of the petition attached by first class mail to the Defendant at 2613 Emancipation Ave, Houston, TX 77004.

Signed on: 2/11/2025

Justice of the Peace Precinct 3, Place 1

Revised: 06/09/2016



Constable Return of Individual

Cause #: 253100018649

FEB 2 1 2025

Tracking #: E0188871 JP 3-1 HARRIS COUNTY

In the case of Richardson, Pamela VS James, Qijah Sheryl a CITATION and attached SMALL CLAIMS <u>PETITION</u> was issued by the <u>Justice Of The Peace 3-1</u> court of <u>HARRIS</u> County, <u>TX</u> and came to hand on the 16 day of January, 2025 at 9:23AM to be delivered at 2613 EMANCIPATION AVE, HOUSTON, TX 77004 by delivering to: James, Qijah Sheryl

## (Attempted service at 2613 EMANCIPATION AVE, HOUSTON, TX, 77004 unless otherwise noted.)

Date	Time	Deputy Name	Agency	Service Attempt Type	Attempted Address	Remarks
2/14/2025	10:13:00 AM	DUC TA	7	SERVED	2613 EMANCIPATION AVE HOUSTON TX 77004	SERVED PER RULE 501.2E
2/4/2025	1:24:00 PM	DUC TA	7	NO ANSWER	2613 EMANCIPATION AVE HOUSTON TX 77004	RTC FOR RULE 501.2E
1/27/2025	7:47:00 AM	DUC TA	7	NO ANSWER/LEFT CARD	2613 EMANCIPATION AVE HOUSTON TX 77004	CARD GONE - LEFT ANOTHER CARD - RESP 'S CARD (TXPL# PKT 8006) LEFT THE SIDE OF THIS PROPERTY AND PARKED AT DRIVE WAY OF THE PROPERTY
1/23/2025	3:00:00 PM	DUC TA	7	NO ANSWER/LEFT CARD	2613 EMANCIPATION AVE HOUSTON TX 77004	CARD GONE - LEFT ANOTHER CARD - RESP 'S CAR (TXPL# PKT 8006) MOVED AND PARKED ON THE SIDE OF THE PROPERTY
1/22/2025	8:28:00 AM	DUC TA	7	NO ANSWER/LEFT CARD	2613 EMANCIPATION AVE HOUSTON TX 77004	CARD GONE - LEFT ANOTHER CARD - RESP'S CAR (TXPT# PKT 8006) IS PARKING AT DRIVEWAY
1/17/2025	12:11:00 PM	DUC TA	7	NO ANSWER/LEFT CARD	2613 EMANCIPATION AVE HOUSTON TX 77004	PROPERTY SECURITY FENCE AROUND THE PROPERTY - DEPUTY WAS UNABLE TO ACCESS INSIDE TO THE FRONT DOOR BUT MAIL BOX IS AT THE FENCE - MAILS IS UNDER RESP'S NAME

### **Service of Individual**

Executed in <u>HARRIS</u> County, Texas by delivering to each of the within name defendant by <u>POSTING AND</u> PRIORITY MAIL PER RULE 501.2E; a true copy of this CITATION together with the accompanying copy of the <u>SMALL CLAIMS PETITION</u>, at the following times and places:

	4	g ge		
		-	•	
	•	,		

## **Constable Return of Individual**

Cause #: 253100018649

Tracking #: <u>E0188871</u>

Name	Date	Time	Full Address of Service
James, Qijah Sheryl	2/14/2025	10:13AM	2613 EMANCIPATION AVE HOUSTON TX 77004

Fee Due \$0.00		
by Deputy DUC TA	- 7C11	
Printed	l	- 1 1 .
Deputy Signature		Asthe
Attempts:	6	
Total Attempts:	6	

James "Smokie" Phillips, Jr , Constable Precinct #7 Harris County Texas

> 5290 Griggs Road Houston Texas 77021 7136436118

(1/3) 480 - 389°

Citation - Small Claims Money Damages

PKT-8006

Case Number: 253100018649

Pamela Richardson

Plaintiff vs.

Qijah Sheryl James

Defendant

*๛๛๛๛๛๛* 

In the Justice Court
Harris County, Texas
Precinct 3, Place 1
14350 Wallisville Road, Suite 102
Courtroom Suite 104

Tracking Number: E0188871

Houston Texas 77049 713-274-0760 www.ip.hctx.net

**Citation (Small Claims Case)** 

 THE STATE OF TEXAS COUNTY OF HARRIS

TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT, OTHER PERSON AUTHORIZED BY COURT ORDER, OR CLERK:

Deliver this citation, together with a copy of the petition, to:

RECEIVED

Qijah Sheryl James

2613 Emancipation Avenue Houston TX 77004 Phone Number: FEB 2 1 2025

JUDGE JCE STEPHENS JP 3-1 HARRIS COUNTY TEXAS

#### TO THE DEFENDANT:

You have been sued. You are commanded to appear by filing a written answer to the petition filed by Plaintiff with the Clerk of the Court on or before the end of the 14<sup>th</sup> day after the date of service of this citation. In your answer, please provide an email address if you consent to email service of any pleadings or other documents in your case. If you fail to file an answer as required, a judgment by default may be rendered for the relief demanded in the petition.

Date Petition Filed: 01/14/2025

Nature of demand made by Plaintiff(s): money owed in the amount of \$20,000.00. A copy of the petition is attached.

#### **Notice**

You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14<sup>th</sup> day after the day you were served with these papers. If the 14<sup>th</sup> day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14<sup>th</sup> day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult the Texas Rules of Civil Procedure, Part V, Rules of Practice in Justice Courts. A copy of the Rules is available at http://www.jp.hctx.net/ or at the Justice Court.

Pate: 1/14/2025

The source of th

/s/ Tamara Broussard

Clerk of the Court Harris County Justice Court Precinct 3, Place 1

Address of Plaintiff

5006 Nichols St Houston TX 77020

10:07A 1/17 - Maile. 2:12 1/22/10 Address of Plaintiff's Attorney

Page 1 of 1

Revised: 06/09/2016

Pamela Richardson	§	In the Justice Court
Plaintiff(s)	8	Harris County, Texas
VS	8	Precinct 3, Place 1
Qijah Sheryl James	8	14350 Wallisville Road, Suite 102
Defendant(s)	8	Courtroom Suite 104
	8	Houston Texas 77049
	8	713-274-0760
		www.jp.hctx.net

Pamela Richardson 5006 Nichols St Houston TX 77020

#### Notice of Hearing on Motion to Transfer of Venue

You are hereby notified that a hearing on the Defendant's Motion to Transfer Venue because of improper venue in this Justice Court is scheduled on May 21, 2025 Motion Docket 8:30 AM. You may appear either in-person in the courtroom or remotely via Zoom using the following instructions.

## Appearance Instructions via Zoom:

The Plaintiff may file a response to the Defendant's Motion to Transfer Venue. The parties may present evidence at the hearing.

If the motion is granted, the judge will sign an order designating the court to which the case will be transferred. If the motion is denied, the case will be heard in this Court.

If the case is transferred to another county, the Plaintiff will be notified to pay the filing fee in the court to which the case is transferred. The Plaintiff has 14 days after receiving the notice to pay the filing fee. There is no refund of any fees already paid. Failure to pay the filing fees will result in dismissal of the case without prejudice.

There is no motion for rehearing, and there is no interlocutory appeal of the ruling on venue.

Date: 4/3/2025



/s/ Tamara Broussard

Clerk of the Court
Justice Court Precinct 3, Place 1

Appropriate courtroom attire is required. Please visit the Court website or contact the Court for specific details.

The court may allow or require a participant to appear at certain court proceedings remotely, such as by videoconference or teleconference. Please check with the court for further information on how to make such a request

Page 1 of 1 Revised: 6/29/2024

# Pam Richard

PHONE

+18327154550

**EMAIL** 

Pgrichardson16@yahoo.com

## Notes about client

No Client Notes

Edit

## **Intake Forms**

No Intake Forms

# **Upcoming Appointments**

No upcoming appointments

# Past Appointments (1)

3:00pm 4:30pm Friday, November 15, 2024

90min

Pam Richard

Retwist (undercut)

**Backto Naturel** 

Paid

RECEIVED OR FILED JUSTICE OF THE PEACE 3-1 HARRIS COUNTY, TEXAS 2/18/2025 7:14 PM

This document shows the series of texts between myself and the Plaintiff Pam Richardson almost 2 weeks after the initial hair appointment. The first graphic at the top of the page shows when she initially made her online appointment.

At the time, I had not seen Ms. Richardson in months, so I asked how she had been. That's when she told me that she had been in an accident (i assumed auto) and she had been off work for months. She did not appear to be limping but I assumed that if there was an injury, she probably was medicated at the time.

She proceeded to sit in my chair so I could start on her hair. We begin to discuss her style and desired outcome, and she ran a few ideas by me.

- 1)She told me she wanted thicker locks and asked me if it was possible to cut her hair and add much thicker loc extensions to match the look she desired. Since her hair is fine and wavy, I discouraged her from doing this as I didn't think it was a healthy option for her hair...neither was it healthy as I told her extensions would be needed every time to bridge her hair.
- 2) Once I talked her out of the extensions, she told me she wanted a cut. She pointed to the desired length by reaching under her arm. And touching the spot to show me how short she wanted it. After asking her if she was sure about the length, she said yes! I proceeded to cut her locs and place them all in a bag, which I handed to her.

I proceeded to style her hair, similar to the thicker loc look by doubling her locs lengthwise and twisting them. I explained what I did to get her that thicker look. She appeared to be very pleased when she walked out and I was happy to do what I felt was a job well done.

Previous to that appointment, i had not seen her in close to a year, and when she came in her locs looked like they were hanging by a thread and about to break off. I did a lot of extra work which she wasn't even charged for since up to that point we had good business interactions and was my way of giving back. All her locs would have fallen out had i not intervened. I have been doing hair for almost 30 yrs and my clients can tell you I do my utmost to be fair and resolve things amicably.

In the past, if a client and I were not seeing eye to eye, I would have happily refunded the service fee(at my loss)because i know it creates goodwill. This was going to be my first compromise if the Plaintiff had called me and we could reach an amicable agreement. Instead, she lied to the credit card company trying to defraud me out of the charges for my service to which I provided evidence after which they ruled in my favor reinstating the charges.

At this point, I really do feel this was an attempt at a money grab, because she was not interested in hearing any of my solutions. I am licensed in the state of Texas, and have been featured twice in the Houston Chronicle, not only that, i am a master stylist that specializes in, and is an expert in loc repairs (many stylists send their clients to me for this type of service). Those locs could have been easily reattached.

Here is a document of the text exchange that occurred. In addition, once she failed at scamming me out of the service fee, she threatened to sue me. Maybe she saw an opportunity to make up for her lack of income due to being off work from her accident. I can not say for sure. Unfortunately, this decision to file a suit has caused a negative impact to, and permanently altered our professional relationship.





## Pam Mouk's Friend

I'm just took it down and realized you cut it I even never looked in that bag

**Until** now

5:57 PM

Hey Pam, good evening. Oh no! I had asked you b4 i cut it, and showed you where it would fall. I thought it was fine since you gave me the go ahead.

Read 5:59 PM

> Read 6:01 PM

Ok where do we go now?

I swear I thought you asked did I want you to trim it,I didn't hear you if you said cut cause I Kno I wouldn't have said cut it especially this short I thought you double it that's why it looked think cause I asked can it get think,but I would have













RECEIVED OR FILED JUSTICE OF THE PEACE 3-1 HARRIS COUNTY, TEXAS 2/18/2025 7:14 PM

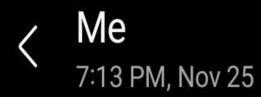
The text block below is a continuation of the above text.

# / Pam Mouk's Friend

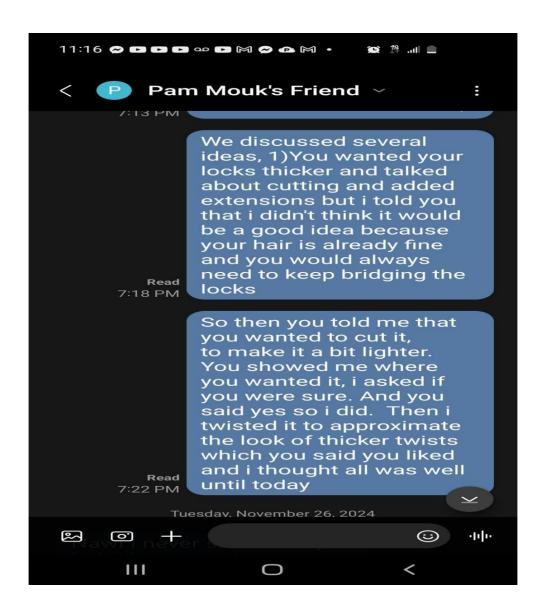
6:33 PM, Nov 25

I swear I thought you asked did I want you to trim it,I didn't hear you if you said cut cause I Kno I wouldn't have said cut it especially this short I thought you double it that's why it looked think cause I asked can it get think,but I would have never said cut it.but nawl this to short the only reason I got the style took down cause I thought taking it down that it was still long I almost had a heart attack man.

Here is a screenshot of me sharing my recollection of events with her below .



Pam, i dont know what else to say but im sorry...i remember confirming with you. I asked u if you were sure. Once you said yes, i just cut it. I typically dont even do extra services unless they are booked on the app to avoid confusion ...since you were my last person of the day tho i went ahead n did it



This is my response above

## Pam Mouk's Friend

3:21 PM, Nov 26

Nawl I never said cut my hair I been coming to you over 20 something years my hair wasn't even this short, you never showed me are ask me am I sure cause I never said out I do remember you saying do you want me to trim it and I said yes,it doesn't make since me asking you do you think I can and hair to mines and then say cut it like I literally haven't ate my stomach turning,i hope you have cameras and it recorded us cause I would have never ever want my hair this short I'm sorry but ever thing you texts is so not right you never showed me are ask me am I sure this is just not right like, even when I made my appointment retwist and style even when you said I owe more money I was trying to figure out why but I thought it was the length of time that I was there which I didn't think was right cause you left and I restarted the dryer like twice waiting on you I'm just so upset that we might have to go to court because this just not right at all I really hope you have cameras cause I just need to know if I'm telling a lie are you we didn't discuss cutting my hair, even the styles I showed they hair not short it's think and I do remember that discussion talking about adding extension and you you didn't think that would be good.



I'm still crying you messed up my holidays

11:15 AM

Monday, January 6

Just know all those lies you told remember them cause you will be under oath in court cause it's no a treat it's a promise cause you know you wrong I never asked your Mother fucking ass to cut my hair with your lying ass,I fucking still can't believe you cut mf hair,and if you so telling the truth,I

View all

8:44 PM







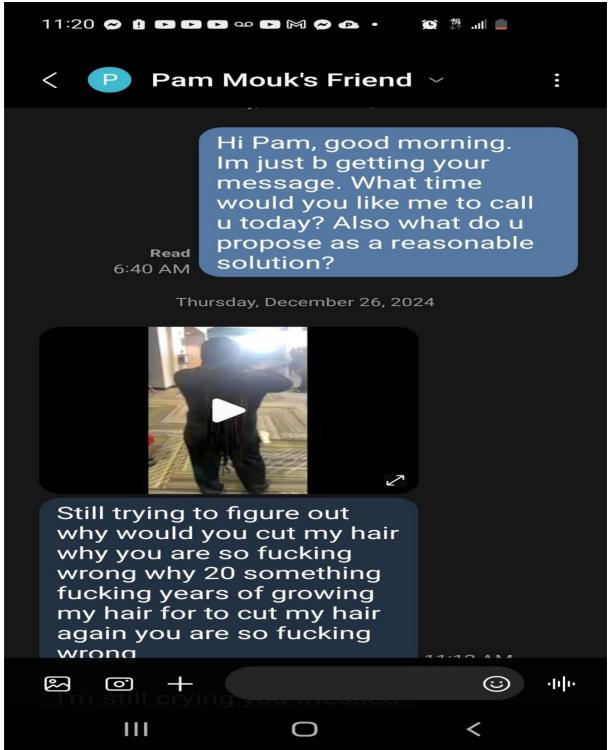


RECEIVED OR FILED JUSTICE OF THE PEACE 3-1 HARRIS COUNTY, TEXAS 2/18/2025 7:14 PM

# Pam Mouk's Friend

8:44 PM, Jan 6

Just know all those lies you told remember them cause you will be under oath in court cause it's no a treat it's a promise cause you know you wrong I never asked your Mother fucking ass to cut my hair with your lying ass,I fucking still can't believe you cut mf hair, and if you so telling the truth, I sent you a certified letter by mail ass the court said I had to do so why you didn't take cause you know your ass lying and you don't want to go to court but I promise we will go to court on my life cause you not getting away that was fucked up what you did, then told whole lie, yeah this my hair the last time my regular beautician did it in August just Kno I will present it and she willing to come to court with me.still can't understand why still trying to wrap my head why yo ass would do that to me



In the above screenshots, I asked the Plaintiff, Pam, to call me because her texts were getting more and more aggressive. I asked her by text to give me a time to call her to see if we could come to a reasonable agreement. Not once but twice she ignored my plea and continued to curse me out. I also attempted, if memory serves correct, to call her twice by phone. She ignored my calls and all attempts to reasonably resolve this amicably.

RECEIVED OR FILED JUSTICE OF THE PEACE 3-1 HARRIS COUNTY, TEXAS 2/18/2025 7:14 PM In the event that claims presented by the plaintiff is not substantiated by evidence. I would like to issue my own counterclaim in the amount of \$20,000

The breakdown is as follows

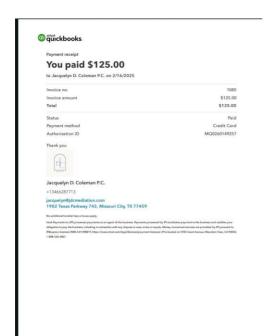
\$2,200 due to lost work income in pursuit of legal
Consults regarding this lawsuit

\$125 Zoom Legal Strategy session

\$10,000 Phycological stress, lack of sleep
And mental suffering from lawsuit

\$7,635 In ongoing project delay cost by having
To delay travel and container shipping
Which will result in additional wharfage
Fees, terminal fees due to
Pushing all current plans into high
Season

Attached is the legal consilt receipt. More will be added as they become available.



I hereby certify that on the 18th day of February 2025, a true and correct copy of the foregoing instrument was forwarded by certified mail or email to the plaintiff Pamela Richardson

Pamela Richardson Plaintiff vs. Qijah Sheryl James Defendant In the Justice Court
Harris County, Texas
Precinct 3, Place 1
14350 Wallisville Road, Suite 102
Courtroom Suite 104
Houston Texas 77049
713-274-0760
www.jp.hctx.net

## **Certified Transcript of Judgment and Bill of Costs**

Suit upon:

for

Filed on:

01/14/2025

Citation

Executed:

01/14/2025, returnable to Honorable Judge Joe Stephens, Justice of the Peace, Precinct 3, Place 1, Term, continuous, and placed in the hand of the office of Constable Precinct 3.

issued:

02/14/2025

Justice Court Costs		Sheriff's/Constable's Costs		
Local Consolidated Civil Fee	\$33.00	Serving Citation	\$85.00	
State Consolidated Civil Fee	\$21.00	Serving Subpoena	\$0.00	
Writ of Possession	\$0.00	Summoning Jury	\$0.00	
Writ of Attachment	\$0.00	Executing Possession	\$0.00	
Writ of Sequestration	\$0.00	Executing Attachment	\$0.00	
Writ of Execution	\$0.00	Executing Sequestration	\$0.00	
Abstract	\$0.00	Executing Garnishment	\$0.00	
Writ of Garnishment	\$0.00	Executing Execution	\$0.00	
Distress Warrants	\$0.00	Executing Distress Warrant	\$0.00	
Subpoenas	\$0.00	Total	\$85.00	
Certified Copy Judgment	\$0.00			
Certified Copy Petition	\$0.00	0 Other Costs		
Alias Citation	\$0.00	Paid by Plaintiff	\$139.00	
Transcript	\$0.00	Cash Bond Posted by Defendant	\$0.00	
Service by Certified Mail	\$0.00	Rent into Registry by Defendant	\$0.00	
Jury Fee	\$0.00	Jury Fee paid by Defendant	\$0.00	
Cash Bond	\$0.00	Total	\$139.00	
Rent in Registry	\$0.00			
Total	\$54.00	Total Paid	\$139.00	

I, Judge Joe Stephens, Justice of the Peace, Precinct 3, Place 1, of Harris County, Texas, hereby certify, that the foregoing is a true and correct Transcript of all the entries on my Docket, Case Number 253100018649, of all the proceedings had in my Court in the cause of Pamela Richardson vs. Qijah Sheryl James, et al.

Signed: 5/21/2025

Joe Stephens

Justice of the Peace Precinct 3, Place 1

Pamela Richardson	<b>§</b>	In the Justice Court
Plaintiff(s)	<i>©</i>	Harris County, Texas
VS	<b>§</b>	Precinct 3, Place 1
Qijah Sheryl James	<b>§</b>	14350 Wallisville Road, Suite 102
Defendant(s)	<i>(</i>	Courtroom Suite 104
· ,	§	Houston Texas 77049
	<i>©</i>	713-274-0760
	-	www.jp.hctx.net

Qijah Sheryl James 2613 Emancipation Avenue Houston TX 77004

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Date: 4/3/2025



/s/ Tamara Broussard

Clerk of the Court Justice Court Precinct 3, Place 1

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Page 1 of 1 Revised: 6/29/2024