CLERK OF THE COURT TABATHA FERGUSON BOSQUE COUNTY CLERK P O BOX 617 MERIDIAN, TX 76665

ATTORNEY FILING HOWARD M REINER ASHLEY N REINER 3410 MERCER STREET **HOUSTON TEXAS 77027** 

#### THE STATE OF TEXAS

TO ALL PERSONS INTERESTED IN THE PROBATE OF PAULA M. WOLLUM AKA PAULA MAE WOLLUM, Deceased, Docket No P08624, County Court at Law Bosque County, Texas.

**HOWARD M REINER** Dependent Administrator of the Estate, filed in the County Court at Law of Bosque County, Texas, on the 28th day of June, 2024, an APPLICATION FOR SELL OF REAL PROPERTY

### Description:

Field Notes for a Lot, Tract or Parcel of Land Containing 0.181 Acres, being 80 Feet of the South End of Lot 2 in Fractional Block 9 of The Nelson Brothers Addition to the City of Clifton According to the Plat Recorded in Volume 26, Page 165, of the Deed Records of Bosque County, Texas, Said Land is that certain tract described in a Deed from Kay Springer to Dennis O, Copeland Et Ux, Susan Gail Copeland Recorded in Volume 439, Page 749, of the Official Public Records of Bosque County, and is more Particularly Described by Metes and Bounds as follows:

Beginning at a -X- Cut on the West Edge of a Sidewalk at the Intersection of the West Line of State Highway 6 (S. Avenue "G") and the North Line of W. 13th Street, for the Southeast Corner of this;

Thence: S 67 Deg 00 Min 00 Sec W 93.93 Feet Along the North Line of W. 13th Street to a 1/2 Inch Iron Rod Set at its Intersection with the East Line of S. Avenue "H", for the Southwest Corner of this;

Thence: N 29 Deg 46 Min 22 Sec W 80.56 Feet Along the East Line of S. Avenue "H" To a 1/2 Inch Rod Set, for the Southwest Corner of a Tract of Land Described in a Deed to Jerry W. Golden Et Ux, Recorded in Volume 424, Page 668 of the Official Public Records of Bosque County, and the Northwest Corner of this:

Thence: N 67 Deg 00 Min 00 Sec E 103,50 Feet to a 1/2 Inch Iron Rod Set on the West Line of State Highway 6, for the Southeast Corner of said Golden Tract and the Northeast Corner of this;

Thence: S 22 Deg 57 Min 07 Sec E 80.00 Feet Along the West Line of State Highway 6 to the Point of Beginning, Containing 0.181 Acres of Land, Parcel No.: R02707

Anyone opposing the above sale has the right under Section 356.254 of the Estate Code to file such opposition in writing with the clerk of the court. Such opposition must be filed by said the First Monday next after the expiration of ten days from the date of posting this citation, the same being the 15th day of July, 2024, at the County Clerk's Office, 110 South Main, Meridian, TX

The officer executing this citation shall post the copy citation at the Courthouse Door of the county in which proceedings are pending, or at the place in or near said Courthouse where public notices customarily are posted, for not less than 10 days before the return day thereof, exclusive of the date of posting and return the original copy of this citation to the Clerk stating in a written return thereon the time when and the place where he posted such copy.

GIVEN UNDER MY HAND AND THE SEAL OF SAID COURT at office in Meridian, Texas, this the 1st day of July, 2024.

TABATHA FERGUSON BOSOUE COUNTY CLERK

# OFFICER'S RETURN ON CITATION

Came to hand on the day of, 20 24, at
12:52-o'clock P.M. and executed on the day of July 20 20
by posting a copy of the within citation for ten days, exclusive of the day of posting,
before the return day hereof, at the County Courthouse door of Bosque County,
Texas, or at the place in or near the said courthouse where public notices customarily are
posted, that is from 11, 204, through 115,
20 <u>2√</u> , inclusive.

CONSTABLE BOSQUE COUNTY, TEXAS

Filed: 6/28/2024 11:33 AM Tabatha Ferguson County Clerk Bosque County, Texas Sandra Wallis

#### **CAUSE NUMBER P08624**

IN THE ESTATE OF \$ IN THE COUNTY COURT

PAULA M. WOLLUM AKA \$ OF LAW

PAULA MAE WOLLUM, \$ BOSQUE COUNTY, TEXAS

# APPLICATION FOR SALE OF REAL PROPERTY LOCATED IN BOSQUE COUNTY, TEXAS

COMES NOW, HOWARD M. REINER, ("Applicant"), Dependent Administrator of the Estate of Paula M. Wollum AKA Paula Mae Wollum, DECEASED, and furnishes the following information to the Court:

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The Inventory, Appraisement, and List of Claims will be filed concurrently with this application.

Π.

A legal description of the real property ("the Property") sought to be sold and a description of the Estate's ownership interest in such property is as follows:

100% interest in 413 S Avenue G, Clifton, Texas 76634 (Legal Description Attached Hereto as Exhibit "B")

III.

A verified statement showing the condition of the Estate, the charges and claims approved or established by suit or that have been rejected and may yet be established, the amount of each claim, the property of the Estate remaining on hand, and all other facts tending to show the necessity and advisability of this proposed sale, is attached to this Application, designated as Exhibit "A", and made a part hereof for all purposes.

It is necessary and advisable to sell the Property to prevent further deterioration of the real property, to prevent loss due to vandalism, fire, or natural act, to pay the debts and expenses of the Estate, including property taxes and to distribute the Estate to Decedent's heirs.

This real property is secured by a lien held by Nationstar Mortgage, LLC ("Nationstar"), in the amount of \$106,042.10, as of November 10, 2023. The Authenticated Secured Claim of Nationstar had not yet been filed as of the date of the filing of the Application for Sale of Real Property.

٧.

The Property of the Estate will be sold at a private sale for cash or on credit or both.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that citation be issued to all persons interested in the Estate, as required by law, and that, the Court enter an Order authorizing Applicant to sell the Estate's interest in the above-described property, at a private sale, and enter such other orders as the Court may deem proper.

Respectfully submitted,

REINER LAW FIRM

HOWARD M. REINER, TBA #16754780 ASHLEY N. REINER, TBA #24103898

3410 Mercer Street

Houston, Texas 77027

(713) 963-8004

(713) 963-8044 Telecopy

ESTEBAN H. GONZALES, TBA #00795379

545 E. John Carpenter, Suite 618

Irving, Texas 75062

Firm@problaw.com

ATTORNEYS FOR DEPENDENT ADMINISTRATOR

#### **AFFIDAVIT**

§ § §

STATE OF TEXAS **COUNTY OF HARRIS** 

BEFORE ME, the undersigned authority, on this day personally appeared HOWARD M. REINER, "Affiant", a person whose identity is known to me. After I administered an oath to Affiant, Affiant testified:

- · 1. "My name is HOWARD M. REINER. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
- 2. I am the Applicant in the foregoing Application for Sale of Real Property Located in Bosque County, Texas. The facts stated in the Application are within my personal knowledge and are true and correct, and no material fact or circumstance has been omitted from said Application."

HOWARD M. REINER Dependent Administrator

SUBSCRIBED AND SWORN TO BEFORE ME by HOWARD M. REINER on this the

2024, to certify that which witness my hand and seal of office.

Notary Public, State of Pexas

# EXHIBIT "A" Verified Exhibit Showing Condition of Estate

STATE OF TEXAS §
COUNTY OF HARRIS §

On this day, HOWARD M. REINER, Affiant, personally appeared before me, and, after being duly sworn, stated the following:

Affiant is the duly appointed and qualified Dependent Administrator of the Estate of Paula M. Wollum AKA Paula Mae Wollum, DECEASED, and in support of Affiant's Application for Sale of Real Property Located in Bosque County, Texas, Affiant submits this Exhibit to the Court showing fully and in detail the condition of the Estate, as follows:

I.

The following are all the charges and claims against the Estate that have been approved or established by suit or have been rejected and may yet be established:

(A) The Authenticated Secured Claim held by Nationstar Mortgage, LLC has not been filed as of this filing and is pending approval from the Court as a Claim as a Preferred Debt and Lien Claim against the real property located at 413 S Avenue G, Clifton, Texas 76634. However, as stated in the Application for Letters for Dependent Administration, the debt as of November 10, 2023, was \$106,042.10.

II.

The following is a full and complete list, to the best of Affiant's knowledge and belief, of all property of the Estate still remaining on hand:

Legal Description	Tot	Total Value	
413 S Avenue G, Clifton, Texas 76634	\$	257,760.00	
(Legal Description Attached Hereto as Exhibit "B")			
Bosque County CAD 2023 Market Value			
TOTAL REAL PROPERTY	\$	257,760.00	

### LIST OF CLAIMS OWING TO THE ESTATE

#### NONE

The sale sought in the foregoing Application is necessary and advisable in order to prevent further deterioration of the real property to prevent loss due to vandalism, fire, or natural act, and to pay the debts and expenses of the Estate, including property taxes, and to distribute the Estate to Decedent's beneficiaries. This real property is secured by a lien held by Nationstar Mortgage, LLC ("Nationstar"), in the amount of \$106,042.10, as of November 10, 2023. The Authenticated Secured Claim of Nationstar had not yet been filed as of the date of the filing of the Application for Sale of Real Property.

> WARD M. REINER Dependent Administrator

SWORN TO AND SUBSCRIBED BEFORE ME by HOWARD M. REINER on this the

June, 2024, to certify which witness my hand and seal of office.

Notary Public, State of Texas

#### EXHIBIT "B"

### Legal Description

Field Notes for a Lot, Tract or Parcel of Land Containing 0.181 Acres, being 80 Feet of the South End of Lot 2 in Fractional Block 9 of The Nelson Brothers Addition to the City of Clifton According to the Plat Recorded in Volume 26, Page 165, of the Deed Records of Bosque County, Texas. Said Land is that certain tract described in a Deed from Kay Springer to Dennis O. Copeland Et Ux, Susan Gail Copeland Recorded in Volume 439, Page 749, of the Official Public Records of Bosque County, and is more Particularly Described by Metes and Bounds as follows:

Beginning at a -X- Cut on the West Edge of a Sidewalk at the Intersection of the West Line of State Highway 6 (S. Avenue "G") and the North Line of W. 13th Street, for the Southeast Corner of this;

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Thence: N 29 Deg 46 Min 22 Sec W 80.56 Feet Along the East Line of S. Avenue "H" To a 1/2 Inch Rod Set, for the Southwest Corner of a Tract of Land Described in a Deed to Jerry W. Golden Et Ux, Recorded in Volume 424, Page 668 of the Official Public Records of Bosque County, and the Northwest Corner of this;

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Thence: S 22 Deg 57 Min 07 Sec E 80.00 Feet Along the West Line of State Highway 6 to the Point of Beginning, Containing 0.181 Acres of Land, Parcel No.: R02707

# **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing APPLICATION FOR SALE OF REAL PROPERTY LOCATED IN BOSQUE COUNTY, TEXAS has been sent to the following parties via first class mail and via certified mail, return receipt requested on this the 28 day of June 2024:

# VIA ELECTRONIC SERVICE:

Nathan@mclaw.org
Nathan Smith
Malcolm Cisneros, A Law Corporation
2112 Business Center Drive
Irvine, CA 92612
ATTORNEY FOR NATIONSTAR
MORTGAGE, LLC

# <u>VIA CMRRR #94071118987654682857 59</u> & VIA FIRST CLASS MAU.:

Peggy Noll Wollum Dean 615 N. Ave. K, Unit B Clifton, TX 76634 HEIR

# <u>VIA CMRRR #94071118987654682857 04</u> <u>& VIA FIRST CLASS MAIL:</u>

Nina Joyce Wollum Andrews 4620 Concord Rd. Waco, TX 76705 HEIR

## <u>VIA CMRRR #94071118987654682857 80</u> & VIA FIRST CLASS MAIL:

Donna Sue Wollum Williams 500 E. Herndon Saint Jo, TX 76265 HEIR

# <u>VIA CMRRR #94071118987654682859 57</u> & VIA FIRST CLASS MAIL:

Orin Lee Tubbs 142 CR 1604 Clifton, TX 76634 HEIR

# <u>VIA CMRRR #94071118987654682859 02</u> <u>& VIA FIRST CLASS MAIL:</u>

Donnis Wade Allen 105 Peach St. Apt. A Crowley, TX 76036 HEIR

ESTEBAN II. GONZALES