

CAUSE NO. _____

(Plaintiffs)

VS.

TEXAS DEPARTMENT OF
MOTOR VEHICLES
(List other interested parties which may
include the owner and lienholder of record)
(Defendants)

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IN THE _____ COURT
(County or District)

OF LAW NO. _____

(Name of County) COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, _____ ("Plaintiff") complaining of the Texas Department of Motor Vehicles ("Defendant") and (list other defendants), and would show this Court as follows:

1. Plaintiff is an individual residing in _____ County, Texas.
2. Defendant, _____, an individual, may be served with process at _____.

3. The Texas Department of Motor Vehicles ("Defendant or TxDMV") is a public agency and may be served with informal process by serving its representative, Mrs. Sarah I. Swanson, Associate General Counsel, Office of General Counsel, 4000 Jackson Avenue, Austin, Texas 78731.

4. On or about date, Plaintiff contracted to sell a (year/make), vehicle identification number _____ (the "Vehicle") to (purchaser's name). Plaintiff, in good faith, executed the necessary documents to transfer title to the Vehicle to purchaser's name, but _____.

5. Specifically, the Texas Certificate of Title and associated title documents for the Vehicle were presented to Defendant along with an Application for Title in the name of (purchaser's name). A true and correct copy of the vehicle purchase order is attached hereto as Exhibit "A" and made a part hereof for all purposes.

5. All of the title documents including the manufacturer's certificate of origin have been sent for processing to the Defendant to title and register the Vehicle in (customer's name).

6. Plaintiff would request this Court to enter its judgment upon conclusion of this cause ordering the Defendant to return to Plaintiff the manufacturer's certificate of origin together with all other papers relative to the Vehicle, or allow Plaintiff to obtain a duplicate manufacturer's certificate of origin if a certificate of title has been issued.

Wherefore, Premises Considered, Plaintiff prays that Defendant be served with citation herein and that this Court order the Defendant to return the manufacturer's certificate of origin and all other documents relative to the Vehicle to Plaintiff, or allow Plaintiff to obtain a duplicate manufacturer's certificate of origin if a certificate of title has been issued and for such other and further relief to which Plaintiff may be entitled.

Respectfully submitted,

Plaintiff, *pro se* or Plaintiff's Attorney

Address:

City, State, Zip Code:

Telephone:

Facsimile:

E-mail:

State Bar No.