

CAUSE NO. _____

(Plaintiff)

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IN THE _____ COURT
(County or District)

VS.

OF LAW NO. _____

TEXAS DEPARTMENT OF
MOTOR VEHICLES
(List other potential defendants)
(Defendants)

(Name of County) 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 Vehicle Identification Number (VIN) and Certificate of Title to the Plaintiff on a _____ (the “Vehicle”) and for cause of action would show:

1. Plaintiff is an individual residing in _____ County, Texas.
2. 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.
3. This action involves the refusal of the Department to issue a **Vehicle Identification Number (VIN) and a Certificate of Title** to the Vehicle lawfully purchased by Plaintiff.

4. Plaintiff is unable to comply with the standard requirements of the TxDMV to produce the required paperwork necessary to apply for title because

5. If the normally required documents cannot be obtained, the Defendant requires that a Court order be obtained from a County Court at Law or higher. This is the basis of this lawsuit.

6. 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 Defendant be ordered to issue title to the Vehicle in Plaintiff's name, that all other titles to the vehicle be canceled and that all pending title applications for the vehicle be rejected.

Respectfully submitted,

Plaintiff, *pro se* or Plaintiff's Attorney
Address:
City, State, Zip Code:
Telephone:
Facsimile:
E-mail:
State Bar No.