

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") complaining of the Texas Department of Motor Vehicles ("Defendant") and would show this Court as follows:

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, Ms. Sarah I. Swanson, Associate General Counsel, Office of General Counsel, 4000 Jackson Avenue, Austin, Texas 78731.
3. 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 \_\_\_\_\_.
4. 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,

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