

CITATION
THE STATE OF TEXAS

TO: Tizoc Strong
7110 Elmhurst Rd.
Amarillo, TX 79106

Defendant in the hereinafter styled and numbered cause: 2025-2095-A

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

You are hereby commanded to appear by filing a written answer to the Plaintiff's Amended Petition at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation to the clerk of the 188th District Court, Gregg County, at the Courthouse in said County in Longview, Texas.

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Amended Petition accompanying this citation and made a part hereof.

**BERNARD BLACK, INDIVIDUALLY AND AS CO-
TRUSTEE OF THE RUTH H. BLACK
REVOCABLE LIVING TRUST VS THE
UNKNOWN HEIRS OF SARAH L. DANSBY
DECEASED, ET AL**
Partition Suit

Filed in said court the 5th day of August, 2026

Issued and given under my hand and seal of said Court at office, 8/5/2026.

Attorney for Plaintiff:
DAKOTA J. WRINKLE
1910 PACIFIC AVENUE STE 8005
DALLAS TX 75201
469-833-3380

Clerk of the Court:
Trey Hattaway
District Clerk, Gregg County, Texas
P.O. Box 711
Longview, TX 75606



Signed: 8/5/2026 12:59:55 PM
By Dimenya Booker Deputy.

Officer/Authorized Person Return

Came to hand on the 5 day of August, 2026, at 550 o'clock P.M., and executed in Randall County, Texas, by delivering to each of the within named, in person, a true copy of this citation with the date of delivery endorsed thereon, together with the accompanying copy of the petition at the following times and places, to-wit:

Name	Date	Time	Place
<u>Tizoc Strong</u>	<u>8/7/26</u>	<u>115P</u>	<u>7110 Elmhurst Rd. Amarillo, TX 79106</u>

[] Not executed. The diligence use in finding defendant being _____

[] Information received as to the whereabouts of defendant being _____

Fees \$ _____

Sheriff / Constable _____ County, Texas
By Sgt Mull Deputy/Process Server

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is Susan Muller, my date of birth is _____, and my address is P.O. Box 19152
Amarillo, TX 79114

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in Randall County, State of Texas, on the _____ day of _____, 2026.
Declarant/Process Server
Sgt Mull ID # and Expiration of Certification PS-16067 5/31/27

On this day, _____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this Citation was executed by him/her in the exact manner recited on the return.

Sworn to and subscribed before me on _____, _____, _____ Notary Public

CAUSE NO. 2025-2095-A

BERNARD BLACK, individually	§	IN THE DISTRICT COURT
and as Co-Trustee of the Ruth H.	§	
Black Revocable Living Trust,	§	
<i>Plaintiff,</i>	§	
	§	
VS.	§	188th JUDICIAL DISTRICT
	§	
THE UNKNOWN HEIRS OF	§	
SARAH L. DANSBY, DECEASED,	§	
ET AL.,	§	
<i>Defendants.</i>	§	GREGG COUNTY, TEXAS

**PLAINTIFF'S THIRD AMENDED PETITION TO PARTITION REAL
PROPERTY**

COMES NOW, Bernard Black, individually and as Co-Trustee of the Ruth H. Black Revocable Living Trust, Plaintiff, by and through his attorney, Dakota J. Wrinkle, and files this Third Amended Petition to Partition Real Property against The Unknown Heirs of Sarah L. Dansby, Deceased, et al., Defendants, and for good and specific cause of action shows the Court as follows:

I. DISCOVERY CONTROL PLAN

1. As provided in the Texas Rules of Civil Procedure, Plaintiff intends to conduct discovery under Level 2.

II. PLAINTIFF

2. This Petition is filed by Bernard Black, individually and as Co-Trustee of the Ruth H. Black Revocable Living Trust (hereinafter the "Plaintiff"), an individual whose address is 1039 S Parker Rd, Apt E2, Denver, CO 80231. The last three digits of Plaintiff's Colorado driver's license are 926. The last three digits of Plaintiff's Social Security number are 314.

III. DEFENDANTS

3. The Unknown Heirs of Sarah L. Dansby, Deceased (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.
4. Karen Bey, as Trustee of the Dewey C. Dansby Trust 2007 (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 1418 5th St, #1, Alameda, CA 94501.
5. Kevin Black, individually and as Co-Trustee of the Ruth H. Black Revocable Living Trust (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 400 Dayton St, Tyler, TX 75702.
6. The Unknown Heirs of Homer Dansby Franklin Jr., Deceased (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.
7. The Unknown Heirs of Ernestine Walker Dansby (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.
8. The Unknown Heirs of Phyllis Dansby Fisher, Deceased (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.
9. Beryle Fisher Server (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 3410 Heritage Ln, Forest Hill, TX 76140.
10. Christopher Fisher (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 184 Dixon Ave, Amityville, NY 11701.

11. The Unknown Heirs of Clarence McLemore, Deceased (hereinafter a "Defendant") and their residences are unknown to Plaintiff.
12. Tammy McLemore (hereinafter a "Defendant") is an individual whose residence and whereabouts are unknown to Plaintiff.
13. Sonja B. McLemore Bolden (hereinafter a "Defendant") is an individual whose residence and whereabouts are unknown to Plaintiff.
14. Minnie McLemore Watson Horn (hereinafter a "Defendant") is an individual whose residence and whereabouts are unknown to Plaintiff.
15. Sandra Strong McLemore (hereinafter a "Defendant") is an individual whose residence and whereabouts are unknown to Plaintiff.
16. Linda R. Strong (hereinafter a "Defendant") is an individual who may be served with process at Defendant's residence by personal delivery at 3050 Remond Dr, Apt 3207, Dallas, TX 75211.
17. Bryany D. Strong (hereinafter a "Defendant") is an individual who may be served with process at Defendant's residence by personal delivery at 1520 N Beckley Ave, Apt 1126, Dallas, TX 75203.
18. The Unknown Heirs of Eric E. Strong, Deceased (hereinafter a "Defendant") and their residences are unknown to Plaintiff.
19. Eric J. Strong (hereinafter a "Defendant") is an individual who may be served with process at Defendant's residence by personal delivery at 3913 75th Pl, Lubbock, TX 79423.

20. Tizoc Strong (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 7110 Elmhurst Rd, Amarillo, TX 79106.
21. Tamitra Taylor (hereinafter a “Defendant”) is an individual whose residence is unknown to Plaintiff.
22. Destine Townley (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 5503 67th St, Lubbock, TX 79424.
23. Rowland L. Strong (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 2308 Forestcrest Dr, Plano, TX 75074.
24. Orlin Goode (hereinafter a “Defendant”) is an individual whose residence and whereabouts are unknown to Plaintiff.
25. Margeon Goode (hereinafter a “Defendant”) is an individual whose residence and whereabouts are unknown to Plaintiff.
26. Burkley Goode (hereinafter a “Defendant”) is an individual whose residence and whereabouts are unknown to Plaintiff.
27. Gregory Griffin (hereinafter a “Defendant”) is an individual whose residence and whereabouts are unknown to Plaintiff.
28. Gloria Griffin Devers (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 121 Boca Raton Way, Lancaster, TX 75146.

29. Sharon Lee Walker (hereinafter a “Defendant”) is an individual whose residence and whereabouts are unknown to Plaintiff.

30. Henry Lee Jr. (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 4500 Java Grove Ln, Arlington, TX 76005.

31. Shemetria Lee (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 709 Ascot Ct, Ennis, TX 75119.

32. The Unknown Heirs of James R. Dickey, Deceased (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.

33. Sarah Dickey-Hill (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 1313 Wyndmere Dr, Desoto, TX 75115.

34. Gilberta Dickey-Peugh (hereinafter a “Defendant”) is an individual who may be served with process at Defendant’s residence by personal delivery at 1220 Turtle Point Ct, Desoto, TX 75115.

35. The Unknown Owners or Claimants of an Interest in Land Located in Gregg County, Texas (hereinafter a “Defendant”) and their residences are unknown to Plaintiff.

IV. JURISDICTION AND VENUE

36. This is an action *in rem*, and this Court has jurisdiction because the *res* is located in whole or in part in this county.

37. Venue is proper in Gregg County in this cause under Texas Civil Practice and Remedies Code Section 15.011 because this action involves real property, and Gregg County is where all or part of the real property is located.

38. The damages sought in this suit are within the jurisdictional limits of the Court. Pursuant to Tex. R. Civ. P. 47(c), Plaintiff seeks monetary relief over \$1,000,000.00 and non-monetary relief. This court has jurisdiction over the subject matter of this dispute under Section 23.002(a) of the Texas Property Code.

V. FACTS

39. This is an action to Partition real property in accordance with the Texas Rules of Civil Procedure and the Texas Property Code.

40. Plaintiff owns an undivided one-sixteenth fee simple interest and Defendants own an undivided fifteen-sixteenths (15/16) undivided fee simple interest in real property located in Gregg County. The real property is described as:

TRACT I:

A part of the W. P. Chisum Survey of Gregg County, Texas, and described as follows:

BEGINNING at the N. E. Corner of Jesse King's Land;

THENCE N. 18 chains and 7 links to corner of Joe King's Land;

THENCE W. with Joe King's and Asia King's South line 45 chains and 75 links to Asia King's S. W. corner;

THENCE S. 18 chains to N. W. corner of Jesse King's Line 45 chains and 75 links to the place of BEGINNING, containing 82.67 acres of land.

TRACT II:

A part of the W. P. Chisum Survey of Gregg County, Texas, and described as follows:

BEGINNING at the S. W. corner of Paul Jones tract;

THENCE N. 6 chains and 35 links to corner;

THENCE W. 45 chains and 75 links to corner;

THENCE S. 6 chains and 35 links to corner on Blackmond's line;

THENCE E. 45 chains and 75 links to place of BEGINNING, containing 30 acres of land.

TRACT III:

A part of the W. P. Chisum Survey of Gregg County, Texas and described as follows; and being 14 acres out of the Northend of the 38.4 acre tract owned by me, Jesse King inherited from my parents in 1914, and said 38.4 acre tract out of which this 14 acre tract is sold is bounded on the North by Sarah L. Dansby tract and Paul Jones tract; on West by T. D. Blackmond; on the South by Solon King and Joe King; on the East by the church 2 acre tract and a 5 acre track sold to Cuney B. Dansby out of the Northeast corner of the said 38.4 acre tract.

TRACT IV:

A part of the Solomon Slaughter Survey of Gregg County, Texas and described as follows:

BEGINNING at the Southeast corner of a tract of land belonging to Dewey C. Dansby and on the North line of the W.M.H. JOHNSON H.R. Survey; an iron pin, fence line;

THENCE West 850 feet to corner on ravine, an iron pin, witness oak tree 30' West;

THENCE North 1100 feet to corner near Hilton creek, an iron pin;

THENCE West 517 feet to corner on East line of Coleman Survey, an iron pin;

THENCE North 857.2 feet to corner, an iron pin;

THENCE East 290 feet to corner, an iron pin;

THENCE North 300 feet to corner, an iron pin;

THENCE East 106 feet to corner, an iron pin;

THENCE North 21 degrees 30' W. 544.4 feet to corner, an iron pin in branch;

THENCE East 511.23 feet to corner, an iron pin;

THENCE South 2240.97 feet to place of BEGINNING, containing in all 58.35 acres of land, more or less. Said land being identical with land shown in Deed from King heirs to Jane King, recorded in Vol. 29, pages 268-69, Deed Records of Gregg County, Texas, and from Jane King heirs to Dewey Dansby recorded in Vol. 58, pages 240-41, Deed Records of Gregg County, Texas.

TRACT V:

A part of the Solomon Slaughter Survey of Gregg County, Texas, Beginning in Branch;

THENCE West 6 chains to corner with school Lot;

THENCE North 77 chains and 50 links;

THENCE East 2 chains;

THENCE Southeast with meanderings of branch to place of BEGINNING, and containing seven (7) acres of land.

TRACT VI:

A part of the Solomon Survey of Gregg County, Texas, and described as follows:

Being a two (2) acre tract of land conveyed to Trustees of school by Henry King and Jan King and recorded in Volume 32, page 203, Deed Records of Gregg County, Texas, reference to which is hereby made.

TRACT VII:

A part of the A. M. Coleman Survey of Gregg County, Texas,
and described as follows:

BEGINNING on the East line of the A. M. Coleman Survey on
Hilton Creek near the Mt. Pigsgah School house;

THENCE N. 18 chains to a pine on the South line of W. M. Liles
Survey;

THENCE W. 35 chains witness the Black Jack tree;

THENCE S. to Hiltons Creek;

THENCE E. with meanderings of said creek to place of
BEGINNING, containing 65 acres of land more or less; being
the same land described in Deed from Tully Choice to J. S.
Dansby, recorded in Vol. 38, page 324, Deed Records of Gregg
County, Texas.

TRACT VIII:

All that certain tract of land situated in Gregg County, Texas and
being a part of the Solomon Slaughter Survey and described as
follows:

Being (6) acres of land in the form of a square in the North East
corner of that certain 58.35 acre tract of land described in a deed
from Dewey C. Dansby Et. Ux. to Sarah L. Dansby, recording of
record in the deed records of Gregg County, Texas, said tract
being the same 58.35 acres deeded to Jane King by deed recorded
in Volume 29, Pages 268 and 269 of the deed records of Gregg
County, Texas, said (6) acres being more fully described in
application to sell, filed in the Guardianship of Alberta McNeely
on Jan. 21st, 1941.

TRACT IX:

Gregg County Central Appraisal District Property ID: 111760;
This tract may be the same property as one of the above-
described Tracts I-VIII.

TRACT X:

Gregg County Central Appraisal District Property ID: 11231;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XI:

Gregg County Central Appraisal District Property ID: 13889;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XII:

Gregg County Central Appraisal District Property ID: 13949;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XIII:

Gregg County Central Appraisal District Property ID: 13893;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XIX:

Gregg County Central Appraisal District Property ID: 28299;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XX:

Gregg County Central Appraisal District Property ID: 14494;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XXI:

Gregg County Central Appraisal District Property ID: 1602152;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XXII:

Gregg County Central Appraisal District Property ID: 28301;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XXIII:

Gregg County Central Appraisal District Property ID: 1186142;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XXIV:

Gregg County Central Appraisal District Property ID: 1186144;
This tract may be the same property as one of the above-described Tracts I-VIII.

TRACT XXV:

Gregg County Central Appraisal District Property ID: 1186145;
This tract may be the same property as one of the above-described Tracts I-VIII.

Tracts I through XXV are hereinafter collectively referred to as the "Property".

41. The estimated value of the Property is as follows:
 - a. Plaintiff possesses an undivided one-sixteenth ($1/16$) fee simple interest in the Property with an estimated value of \$62,500.00.
 - b. Defendants collectively possess an undivided fifteen-sixteenths ($15/16$) fee simple interest in the Property with an estimated value of \$937,500.00.
42. There are no liens or encumbrances on the Property appearing of record or known to the Plaintiff, and no persons other than the Plaintiff and the Defendants have an interest in the Property.

VI. CAUSE OF ACTION

43. According to Texas Property Code Section 23.001: “joint owner or claimant of real property or an interest in real property [] may compel a partition of the interest or the property among the joint owners or claimants under this chapter and the Texas Rules of Civil Procedure.”

44. According to Texas Property Code Section 23A.003: “In an action to partition real property under Chapter 23 [of the Texas Property Code], the court shall determine whether the property is heirs’ property. If the court determines that the property is heirs’ property, the property must be partitioned under this chapter unless all of the cotenants otherwise agree in a record.”

45. “Heirs’ property” means real property held in tenancy in common that satisfies all of the following requirements as of the filing of a partition action:

- (A) there is no agreement in a record binding all the cotenants that governs the partition of the property;
- (B) one or more of the cotenants acquired title from a relative, whether living or deceased; and
- (C) any of the following applies:
 - (i) 20 percent or more of the interests are held by cotenants who are relatives;
 - (ii) 20 percent or more of the interests are held by an individual who acquired title from a relative, whether living or deceased; or
 - (iii) 20 percent or more of the cotenants are relatives.

Texas Property Code § 23A.002(5).

46. Plaintiff alleges that this action falls within the purview of Section 23A of the Texas Property Code, because there is no agreement in a record binding all the cotenants, all of the co-tenants acquired title from a relative, and because the co-tenants are relatives.

VII. PRAYER

Plaintiff respectfully requests the Court cite Defendants to appear and answer, and on hearing of this action, order a just and equitable partition by sale or division of the Property in accordance with the Texas Rules of Civil Procedure and Chapters 23 and 23A of the Texas Property Code, reflecting the parties' interests, and grant all such further relief, at law and in equity, as deemed just and proper to which Plaintiff is entitled.

Respectfully submitted,

Texas Landowner Law Firm, PLLC
1910 Pacific Avenue, STE 8005
Dallas, TX 75201
P: (469) 833-3380

/s/ Dakota J. Wrinkle

Dakota J. Wrinkle
Bar no.: 24118592
E: dakota@texaslandownerfirm.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2026, I electronically transmitted and served the foregoing document to the Clerk of Court using the E-file system:

John R. Jarvis
State Bar No. 00798280
326 S. Fannin
Tyler, TX 75702
(T): (903) 592-6576
(E): john@jarvis.biz
Attorney for Defendant Karen Bey

Respectfully submitted,

/s/ Dakota J. Wrinkle
Dakota J. Wrinkle