

TAB D

Relator's Request for Findings of Fact and Conclusions of Law
(Filed November 7, 2025)

CAUSE NO. 2025-72470

Candace Louise Curtis,	§	IN THE DISTRICT COURT OF
Plaintiff	§	
v.	§	THE 269th JUDICIAL DISTRICT
	§	
Carl Henry Brunsting,	§	HARRIS COUNTY, TEXAS
Bobbie G. Bayless (and law Firm)	§	
Anita Brunsting	§	
Stephen Mendel (and law Firm)	§	
Amy Brunsting	§	
Neal Spielman (and law Firm)	§	
Carole Brunsting	§	
Bruse Loyd (and law Firm)	§	
Cory Reed (and law Firm)	§	
Candace Kunz-Freed (and law Firm)	§	
Defendants	§	

**PLAINTIFF’S REQUEST FOR FINDINGS OF FACT AND CONCLUSIONS OF LAW
TO THE HONORABLE JUDGE OF SAID COURT:**

Plaintiff, Candace Louise Curtis, appearing pro se, files this Request for Findings of Fact and Conclusions of Law pursuant to Texas Rule of Civil Procedure 296 and respectfully requests that the Court state in writing its findings of fact and conclusions of law supporting its "Final Order Dismissing for Lack of Jurisdiction," which was signed on October 29, 2025. Plaintiff requests that the Court make specific findings of fact and conclusions of law on the following issues, which were raised in Plaintiff’s pleadings, including her “Petition for Summary and Declaratory Judgment” and “Plaintiff’s Brief on District Court Jurisdiction to Review Void Probate Court Orders”:

1. **Findings of Fact and Conclusions of Law** regarding whether the 269th District Court, as a court of general jurisdiction under the Texas Constitution and Texas Government

Code, has subject-matter jurisdiction to hear a collateral attack seeking to declare orders from a statutory probate court void for lack of subject-matter jurisdiction.

2. **Conclusions of Law** identifying the specific legal basis (statutory, constitutional, or precedential) for the Court's determination that it "LACKS JURISDICTION over the claims asserted" by Plaintiff in this cause.

Findings of Fact regarding the basis for the Court's statement in its dismissal order that "The Plaintiff failed to provide any authority to this Court to support jurisdiction," considering that Plaintiff timely filed "Plaintiff's Brief on District Court Jurisdiction" which cited Article V, Section 8 of the Texas Constitution; Texas Government Code §§ 24.007-008; *In re United Services Auto. Ass'n*, 307 S.W.3d 299 (Tex. 2010); and the Memorandum Opinion in *Curtis v. Brunsting*, No. 01-23-00362-CV (Tex. App.—Houston [1st Dist.] Mar. 25, 2025), which stated that there is no statute of limitations affecting judgment's void for want of jurisdiction and that a collateral attack on a void judgment "may be brought in any court of general jurisdiction."

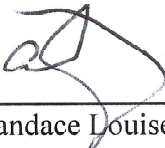
Plaintiff respectfully requests that the Court file its findings of fact and conclusions of law in accordance with the Texas Rules of Civil Procedure.

Certificate of Service

I certify that a true and correct copy of the foregoing instrument was served on the following parties via the court's electronic filing system and by email on this 7th day of November 2025.

Defendant Amy Ruth Brunsting, 2582 Country Ledge, New Braunfels, Texas 78132 At.home@yahoo.com	Defendant Anita Kay Brunsting 801 Bassington Ct. Pflugerville Texas 78660 akbrunsting@outlook.com
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<p>Defendant Carl Henry Brunsting 23410 Saxon Way, Hockley, TX 77447 Houston, Texas 77081 drinabrunsting@sbcglobal.net</p> <p>Defendant Stephen A. Mendel The Mendel Law Firm L.P. 1155 Dairy Ashford, Suite 104 Houston, TX 77079 info@mendellawfirm.com</p> <p>Defendant Carole Ann Brunsting 5822 Jason St. Houston, Texas 77074 cbrunsting@sbcglobal.net</p> <p>Defendant Candace Kunz-Freed 9545 Katy Freeway, Suite 390, Houston, Texas 77024 candace@freedlawyer.com</p>	<p>Defendant Bobbie G. Bayless Bayless & Stokes 2931 Ferndale St. Houston, Texas 77098 bayless@baylessstokes.com</p> <p>Defendant Neal Spielman Griffin & Matthews 1155 Dairy Ashford, Suite 300 Houston, Texas 77079 nspielman@grifmatlaw.com</p> <p>Defendant John Bruster Loyd Jones, Gillaspia & Loyd, L.L.P. 4400 Post Oak Pkwy, Suite 2360 Houston, TX 77027 bruse@jgl-law.com</p> <p>Defendant Cory Reed One Riverway, Suite 1400 Houston. Texas 77056 creed@thompsoncoe.com</p>
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11/07/2025
Candace Louise Curtis, Plaintiff Pro Se
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American Canyon, CA 94503
Email: occurtis@sbcgloabal.net
(925)759-9020

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

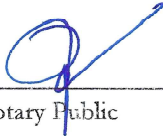
State of California

County of napa

On 11.7.2015 before me, T. Johnston, Notary Public, personally appeared
Candace Louise Curtis

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. I certify under Penalty of Perjury under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS MY HAND AND OFFICIAL SEAL.



Signature of Notary Public



(Notary Seal)

OPTIONAL INFORMATION

The acknowledgment contained within this document is in accordance with California law. Any certificate of acknowledgement performed within the State of California shall use the preceding wording pursuant to Civil Code section 1189. An acknowledgment cannot be affixed to a document sent by mail or otherwise delivered to a notary public, including electronic means, whereby the signer did not personally appear before the notary public, even if the signer is known by the notary public. In addition, the correct notarial wording can only be signed and sealed by a notary public. The seal and signature cannot be affixed to a document without the correct notarial wording.

DESCRIPTION OF ATTACHED DOCUMENT

Plaintiff's Request for Findings of Fact
(Title of document)
Number of Pages _____ (Including acknowledgment)
Document Date _____

CAPACITY CLAIMED BY SIGNER

____ Individual
____ Corporate Officer
____ Partner
____ Attorney-In-Fact
____ Trustee
____ Other: _____



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Status as of 11/10/2025 2:39 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Bobbie G.Bayless		bayless@baylessstokes.com	11/8/2025 12:54:20 AM	SENT
Stephen AnthonyMendel		info@mendellawfirm.com	11/8/2025 12:54:20 AM	SENT
Neal EvanSpielman		nspielman@grifmatlaw.com	11/8/2025 12:54:20 AM	SENT
John BrusterLoyd		bruse@jgl-law.com	11/8/2025 12:54:20 AM	ERROR



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this December 2, 2025

Certified Document Number: 123609865 Total Pages: 5

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com