

THE STATE OF TEXAS
2024-DCL-07682-C

**DEUTSCHE BANK NATIONAL
TRUST COMPANY**

VS

Simon Rodriguez, III

§ IN THE 197TH DISTRICT
COURT

§ OF

§ CAMERON COUNTY, TEXAS

TO: Francisco Salvador Rodriguez, Ariel E. Rodriguez, The Unknown Heirs at Law of Simon Rodriguez AKA Simon Rodriguez Jr, Deceased, and The Unknown Heirs at Law of Leticia Rodriguez, Deceased

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 am on the Monday next following the expiration of 42 days after the date this citation was issued, 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](https://www.texaslawhelp.org)."

You are hereby commanded to appear by filing a written answer to the **Plaintiffs Original Petition** at or before 10:00 o'clock A.M. on the Monday next after the expiration of 42 days after the date of issuance of this citation before the Honorable 197th District Court of Cameron County, at the Courthouse in said County in Brownsville, Texas. Said **Plaintiffs Original Petition** was filed in said court on the 30th day of December, 2024 in the above entitled cause.

A brief statement of the nature of this suit is as follows, to-wit:

Plaintiff Deutsche Bank National Trust Company, as Trustee, in trust for Registered Holders of Long Beach Mortgage Loan Trust 2005-1, asset-backed certificates, Series 2005-1, its successors in interest or assigns, by and through its attorney of record Joseph M. Vacek of Robertson, Anschutz, Schneid, Crane & Partners, PLLC, 5601 Executive Dr., Suite 400, Irving, Texas 75038, brought suit against Simon Rodriguez III, Lino Esteban Rodriguez, Francisco Salvador Rodriguez, Julian Rodriguez, Ariel E. Rodriguez, The Unknown Heirs at Law of Simon Rodriguez aka Simon Rodriguez Jr, and The Unknown Heirs at Law of Leticia Rodriguez, Deceased and any other person claiming any subordinate right, title and/or interest in 5 Ruby Circle, Brownsville, Texas 78521 ("Property"), and legally described as:

LOT 1, BLOCK 10, VALLE DE ORO SUBDIVISION, CAMERON COUNTY, TEXAS, ACCORDING TO THE MAP THEREOF RECORDED IN CABINET 1, PAGE 419, A&B, MAP RECORDS, CAMERON COUNTY, TEXAS.

as is more fully shown by **Plaintiffs Original Petition** on file in this suit.

Issued and given under my hand and seal of said Court at Brownsville, Texas, on this the 8th day of January, 2026.

ATTORNEY:

JOSEPH M. VACEK
24039948
817-873-3080 x157
5601 Executive DR STE 400
Irving TX 75038



Laura Perez-Reyes
District Clerk of Cameron County
974 E Harrison Street
Brownsville, Texas 78520
Signed: 1/8/2026 9:06:52 AM

By: Esperanza Torres
Esperanza Torres, Deputy Clerk