CLERK'S RECORD

VOLUME 1 of 1

Trial Court Cause No. 03-26-00351-CV

In the 3rd County Court

of Lampasas County, Texas,

Honorable _____, Judge Presiding

In the Interest of J.V.G., a child

Appealed to the

Court of Appeals for the 3rd District of Texas, at Austin, Texas.

Attorney for Appellant(s):

Bobby Dale Barina

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Attorney for: RICHARD BADU, Appellant(s)

Linda Kay Burkett

Deputy District Clerk

Lampasas County, Texas

BILL OF COSTS

In the Interest of J.V.G., a child

Cause # 25DC 23996

Richard Badu; PETITIONER

Attorney for Petitioner: Bobby Dale Barina

Theneshia Yvonne Glaze; RESPONDENT

Attorney for Respondent: PRO SE

TO OFFICERS OF COURT

Court's Fee: FOR CLERKS RECORDS	$175.00
TOTAL:	$175.00
BALANCE PAID:	04/13/2026

A true and Correct Account

ATTEST:

Judith Virginia Harrison

Clerk, Court 27th District Lampasas County, Texas

By: Linda Kay Burkett, Deputy

COURT OF APPEALS

APPEAL NO. 03 26-00351-CV

CAUSE 25DC 23996

IN THE INTEREST OF J.V.G., a child

Richard Badu VS Theneshia Yvonne

Volume 1

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Erin Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Mata

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF JORDAN VONNE GLAZE, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent, ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

ORIGINAL PETITION FOR BILL OF REVIEW

TO THE HONORABLE JUDGE OF SAID COURT:
This petition is verified. See Unsworn Declaration.

COMES NOW, Richard K. Badu, Petitioner, appearing pro se, and respectfully files this Original Petition for Bill of Review to set aside the April 27, 2016 Order Establishing the Parent-Child Relationship in Cause No. 19476. In support thereof, Petitioner would show the Court as follows:

I. DISCOVERY LEVEL AND PARTIES

1. Discovery in this matter shall be conducted under Level 2 pursuant to Rule 190 of the Texas Rules of Civil Procedure.
2. Petitioner, **Richard K. Badu**, was the Respondent in the original Suit Affecting the Parent-Child Relationship ("SAPCR") under this Cause Number. The last three digits of Petitioner's driver's license are **540**, and the last three digits of his Social Security number are **937**. Petitioner's legal domicile is **Orlando, Florida**.
3. Respondent, **Theneshia Yvonne Glaze (also known as Theneshia Y. Culpepper-Glaze)**, is an individual and was the Petitioner in the original SAPCR. Her last known address is 1610 Stonebrooke Drive, Edwardsville, IL 62025.
4. **Eric L. Glaze, a presumed father of the child**, is a Proposed Necessary Party. The last known address for Eric Glaze from the Maryland divorce proceedings (**Case No. 08-C-14-000839**) was 11211 F Heron Lane, Waldorf, MD 20603. Petitioner, however, has recently discovered through

diligent investigation that Eric Glaze's current address is believed to be 6438 Ocelot St, Waldorf, MD 20603.

II. JURISDICTION AND VENUE

5. This Court retains continuing, exclusive jurisdiction over the parent-child relationship under Texas Family Code §155.001 because it rendered the 2016 order.

6. A bill of review attacking the Texas judgment properly lies in this court. The Court has personal jurisdiction over Petitioner (by filing) and Respondent (as original SAPCR petitioner).

7. Venue is proper in Lampasas County pursuant to Texas Civil Practice and Remedies Code §15.002(a)(1).

III. LEGAL STANDARDS

8. This Bill of Review is governed by the equitable standards requiring proof of:

    a) a meritorious defense,

    b) that Petitioner was prevented from asserting it by the opposing party's fraud, and

    c) that this was unmixed with Petitioner's own fault. See Caldwell v. Barnes, 975 S.W.2d 535 (Tex. 1998); King Ranch, Inc. v. Chapman, 118 S.W.3d 742, 751–52 (Tex. 2003) (distinguishing extrinsic from intrinsic fraud). In the Interest of Child v. H.C (2022), the appellate court emphasized that a misstatement regarding parentage within a proceeding is intrinsic fraud, which does not support a Bill of Review because it could have been litigated initially. In contrast, **Petitioner's case involves extrinsic fraud**. **Respondent deliberately concealed her divorce and the presumed father's identity**, preventing any meaningful opportunity to defend. This structural misconduct justifies equitable relief under a Bill of Review.

IV. NATURE OF SUIT AND STATUTE OF LIMITATIONS

9. This is a direct, equitable action to set aside the April 27, 2016 "Order Establishing the Parent-Child Relationship" (of which Petitioner requests this Court take judicial notice).

10. Although more than four years have elapsed, Petitioner asserts that the four-year statute of limitations for this action, pursuant to Tex. Civ. Prac. &

Rem. Code §16.051, has been equitably tolled by Respondent's extrinsic fraud. Petitioner pleads that this action was filed within a reasonable time after the discovery of said fraud.

11. This is not a paternity challenge under Tex. Fam. Code §160.607, but a direct equitable attack on the 2016 judgment based on extrinsic fraud. The limitations question is governed by equitable principles, and the residual four-year period is subject to tolling.

V. MERITORIOUS DEFENSE TO ORIGINAL ACTION

12. Petitioner has a meritorious defense to the finding that he is the father of **Jordan Vonne Glaze, born October 10, 2014**.

13. On **April 4, 2014**, Respondent, **Theneshia Yvonne Glaze**, filed a Complaint for Absolute Divorce against **Eric L. Glaze** in the Circuit Court for Charles County, Maryland (**Case No. 08-C-14-000839**). The Maryland docket reflects that the divorce was finalized on **June 12, 2014**, and that the child in this case was born after the divorce was granted. Subsequent docket entries in 2018 show "Custody or Visitation Issues" being addressed in the same Maryland case. While the docket does not specify which child or children were the subject of the 2018 custody/visitation proceeding, it nonetheless demonstrates that **Eric L. Glaze** remained active in Maryland family litigation after the Texas SAPCR was filed, confirming that he was a known and locatable party.

14. The **Judgment of Absolute Divorce** was entered on **June 12, 2014**. The **birth of the child** on **October 10, 2014** occurred **120 days after the divorce judgment**, well within the **301-day statutory window under Tex. Fam. Code §160.204(a)(2)**, creating a **legal presumption that Eric L. Glaze is the child's father**.

15. The Maryland docket further shows that **Eric L. Glaze** was served with process, filed an Answer on **April 15, 2014**, and participated in the divorce proceeding. He was therefore a known, locatable, and **legally presumed father at the time the Texas SAPCR was filed**.

16. Under **Tex. Fam. Code §§160.603 and 160.604**, a presumed father is a necessary party to any proceeding to adjudicate the parentage of a child. **The Texas court was required to join Eric L. Glaze before issuing any order establishing another man's parentage.**

17. Because **Eric L. Glaze** was not joined, the April 27, 2016 order was rendered without jurisdiction over all necessary parties, resulting in a defective and voidable judgment.

18. This Court was not made aware of Eric Glaze's legal presumption of paternity and therefore proceeded in error. The Original Order was issued without joinder of a necessary party, rendering it defective.

VI. EXTRINSIC FRAUD AND DUE PROCESS VIOLATION

19. Petitioner was prevented from presenting this defense due to Respondent's extrinsic, collateral fraud.

20. In her **January 23, 2015 *First Amended Petition* in this SAPCR**, Respondent falsely swore: "The child, JORDAN VONNE GLAZE, **has no presumed, acknowledged, or adjudicated father**."

21. This statement was materially false. At the time she filed this sworn pleading in Texas, Respondent:
a. Had recently obtained a divorce from **Eric L. Glaze** in Maryland;
b. Had addressed custody or visitation issues regarding the child in that Maryland proceeding; and
c. Knew that the child's birth date fell within the **301-day presumption period**, making ***Eric L. Glaze* the presumed father under Tex. Fam. Code §160.204(a)(2)**.

22. The Maryland court record confirms that Respondent knew the whereabouts of **Eric L. Glaze**, as he had been personally served, filed an Answer, and actively participated in the Maryland case.

23. Respondent's misrepresentation was outcome-determinative because it prevented the Texas court from applying the mandatory presumption of paternity and joinder provisions of Tex. Fam. Code Chapter 160. This omission corrupted the framework of the proceeding and denied Petitioner a fair opportunity to defend against the establishment of parentage.

24. The **fraud was extrinsic** in nature because it kept the Texas court from considering an indispensable party and deprived Petitioner of a meaningful opportunity to assert a complete defense. This structural defect is not cured by the passage of time and warrants equitable relief through this Bill of Review.

VII. NO FAULT OR NEGLIGENCE BY PETITIONER

24. Petitioner's failure to present his defense was unmixed with any fault or negligence. He had no verifiable knowledge of Respondent's prior marriage and relied entirely on her sworn statement. The Maryland record was not reasonably discoverable at the time due to out-of-state docket unfamiliarity, lack of identifying information to run targeted searches, and reliance on Respondent's sworn statements.

25. Petitioner exercised diligence but did not discover the fraud until August 5, 2025. While preparing for, and in the aftermath of, a July 23, 2025 hearing in a Florida child support proceeding (Case No. 48-2024-DR-009444-O), Petitioner conducted independent research that led to the discovery of previously concealed information.

27. Petitioner filed this Petition within a reasonable time after discovery.

VIII. DEPRIVATION OF FAIR OPPORTUNITY AND ONGOING HARM

28. As a direct result of Respondent's collateral misrepresentation, Petitioner was denied his day in court on the parentage framework and has been **prevented from establishing any relationship with the child**. **Petitioner has never met the child, who is now nearly 11 years old.** The same misrepresentation that corrupted the framework also produced ongoing deprivation. Equity should not allow a judgment rooted in a structural defect to stand where the petitioner acted promptly upon discovery.

IX. NO OTHER ADEQUATE LEGAL REMEDY

29. Petitioner had no opportunity to appeal or move for a new trial, as the fraud was not discovered in time.

X. PRAYER FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue citation to **Theneshia Yvonne Glaze** and **Eric Lemont Glaze**;
2. Set this matter for an evidentiary hearing.
3. Vacate the April 27, 2016 SAPCR order in Cause No. 19476;
4. Upon vacating the SAPCR, decline further jurisdiction under the **UCCJEA** and transfer the matter to Illinois as the more convenient forum under **Texas Family Code § 152.207**;
5. **In the alternative, if the Court retains jurisdiction:**
   a. Reopen the issue of parentage under **Texas Family Code Chapter 160** and join **Eric L. Glaze** as a party;
   b. Order genetic testing under **Texas Family Code § 160.502**; and
   c. Permit alternative service under **Rule 106** if necessary.
6. Order Respondent to pay attorney's fees, costs, and expenses as appropriate;
7. Issue an order prohibiting enforcement of the vacated Texas order in any other jurisdiction, including Florida (**Case No. 48-2024-DR-009444-O**); and
8. Grant such other and further relief to which Petitioner is justly entitled.

UNSWORN DECLARATION

My name is Richard K. Badu, my date of birth is July 14, 1980, and my address is 123 Aspire Dr., Kissimmee, FL 34747.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Orange County, Florida, on August 15, 2025.

EXHIBITS

- **Exhibit A**: True and correct printout from the Maryland Judiciary Case Search for **Case No. 08-C-14-000839** (Charles County Circuit Court). **Theneshia Y. Glaze v. Eric L. Glaze.**
  This docket is publicly accessible and can be independently verified by the Court at:
  https://casesearch.courts.state.md.us/casesearch/
  (Search: Court System –> Circuit Court; County –> Charles; Case Number : **08C14000839**)

Respectfully submitted.
By: /s/ Richard K. Badu
Richard K. Badu, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

"Exhibit A"

Maryland Judiciary Case Search

NOTICE: Available

Case Detail

Case Information

Court System: **Circuit Court For Charles County - Family**
Location: **Charles Circuit Court**
Case Number: **08-C-14-000839**
Title: **Theneshia Glaze vs Eric Glaze**
Case Type: **Divorce - Absolute**
Filing Date: **04/04/2014**
Case Status: **Closed**
Judicial Officer: **To Be Assigned, Judge**

Involved Parties Information

Converted Fee Party

Name: **FeeParty, Converted**

Defendant

Name: **Glaze, Eric**

Address: **11211 F Heron Lane**
City: **Waldorf** State: **MD** Zip Code: **20603**

Plaintiff

Name: **Glaze, Theneshia**

Address: **1610 Stonebrooke Drive**
City: **EDWARDSVILLE** State: **IL** Zip Code: **62025**

Attorney(s) for the Plaintiff

Name: **GUNDLACH, PHILIP L**
Appearance Date: **04/04/2014**
Removal Date: **09/02/2016**

Address Line 1: **PA HOTCHKISS & ASSOC**
Address Line 2: **PO BOX 465**
City: **RIDERWOOD** State: **MD** Zip Code: **21139**

Court Scheduling Information

Event Type	Event Date	Event Time	Judge	Court Location	Court Room	Result
Hearing - Settlement	03/28/2018	09:00:00	Cooley, Douglas C.	Charles County Family Magistrate		Concluded / Held
4D Hearing - Support	05/24/2018	14:00:00	Brown, Monise A.	Charles County Family Magistrate	Court Room F	

Judgment Information

Judgment Event Type: **Converted Judgment Event Type**
Judge:

Document Information

File Date: **04/04/2014**
Document Name: **Complaint - Absolute Divorce**
Comment: **Motion: 1 Sequence: 0 Create Initials: BRH Create Date: 04/04/2014 Update Initials: BG Update Date: 06/16/2014 DIDA - Complaint for Absolute Divorce with Separation Agreement and Case Information Report Filed: 04/04/2014 Party: PLT PartyNum: 1 PartyName: Theneshia Glaze**

File Date: **04/04/2014**
Document Name: **Custody or Visitation Issues**
Comment: **Motion: 2 Sequence: 0 Create Initials: BRH Create Date: 04/04/2014 Update Initials: BG Update Date: 06/16/2014 SCUV - **Custody or Visitation Issues** Filed: 04/04/2014 Party: PLT PartyNum: 1 PartyName: Theneshia Glaze**

File Date: **04/04/2014**
Document Name: **Summons Issued (Service Event)**
Comment: **Motion: 3 Sequence: 0 Create Initials: BRH Create Date: 04/04/2014 NWSU - Writ of Summons - Civil Issued Filed: 04/04/2014 Party: DEF PartyNum: 1 PartyName: Eric Glaze Routing: 04/04/2014**

File Date: **04/04/2014**
Document Name: **Service Issued**

Comment:	**ServedDate: Apr 15 2014 12:00AM ServiceAgency: Returned To Attorney ResponseDate: May 15 2014 12:00AM Party Name: Eric Glaze**

File Date:	**04/15/2014**
Document Name:	**Answer**
Comment:	**Motion: 1 Sequence: 1 Create Initials: RR Create Date: 04/17/2014 Update Initials: BG Update Date: 06/16/2014 DANS - Answer to complaint for absolute divorce Filed: 04/15/2014 Party: DEF PartyNum: 1 PartyName: Eric Glaze**

File Date:	**04/17/2014**
Document Name:	**One ProSe Party When Answer Received**
Comment:	**Motion: 4 Sequence: 0 Create Initials: RR Create Date: 04/17/2014 Update Initials: BG Update Date: 06/16/2014 SPSA - One ProSe Party when Answer Received Filed: 04/17/2014 Routing: 04/17/2014**

File Date:	**04/21/2014**
Document Name:	**Affidavit of Service**
Comment:	**Motion: 5 Sequence: 0 Create Initials: ABH Create Date: 04/22/2014 Update Initials: ABH Update Date: 04/22/2014 DAFS - Affidavit of Process Service Filed: 04/21/2014**

File Date:	**04/21/2014**
Document Name:	**Motion**
Comment:	**Motion: 6 Sequence: 0 Create Initials: ABH Create Date: 04/22/2014 Update Initials: BG Update Date: 05/08/2014 MMOT - Motion to Take Testimony Filed: 04/21/2014 Party: PLT PartyNum: 1 PartyName: Theneshia Glaze Decision: Granted - 05/08/2014**

File Date:	**05/08/2014**
Document Name:	**Response/Reply**
Comment:	**Motion: 6 Sequence: 1 Create Initials: BG Create Date: 05/08/2014 Update Initials: BG Update Date: 06/16/2014 DDEC - Order tht matter be referred to a Standing Examiner for taking of testimony. Copy mailed plt atty and deft. Filed: 05/08/2014**

File Date:	**05/19/2014**
Document Name:	**Miscellaneous**
Comment:	**Motion: 7 Sequence: 0 Create Initials: ABH Create Date: 05/20/2014 Update Initials: BG Update Date: 06/16/2014 DTTE - Notice of Time/Place of Taking Evidence Filed: 05/19/2014**

File Date:	**06/02/2014**

Document Name:	**Notice of Filing Record**
Comment:	**Motion: 8 Sequence: 0 Create Initials: ABH Create Date: 06/03/2014 Update Initials: BG Update Date: 06/16/2014 DNFR - Notice of the Date of Filing the Record Filed: 06/02/2014**

File Date:	**06/02/2014**
Document Name:	**Testimony Taken**
Comment:	**Motion: 9 Sequence: 0 Create Initials: ABH Create Date: 06/03/2014 Update Initials: ABH Update Date: 06/03/2014 DRPE - Testimony Filed: 06/02/2014**

File Date:	**06/12/2014**
Document Name:	**Judgment of Absolute Divorce**
Comment:	**Motion: 10 Sequence: 0 Create Initials: BG Create Date: 06/16/2014 Update Initials: BG Update Date: 06/16/2014 DDJA - Judgment of Absolute Divorce entered. Copy mailed atty and deft. Filed: 06/12/2014**

File Date:	**06/16/2014**
Document Name:	**One ProSe Party When Case Closed**
Comment:	**Motion: 11 Sequence: 0 Create Initials: BG Create Date: 06/16/2014 Update Initials: BG Update Date: 06/16/2014 SPTD - One ProSe Party when Case Closed Filed: 06/16/2014 Decision: Granted - 06/16/2014**

File Date:	**06/16/2014**
Document Name:	**Copy of Judgment for Divorce Fwd to Paper Vision Scanning**
Comment:	**Motion: 12 Sequence: 0 Create Initials: BG Create Date: 06/16/2014 XDIV - Copy of Judgment for Divorce forwarded to Paper Vision Scanning Filed: 06/16/2014**

File Date:	**09/02/2016**
Document Name:	**Attorney Appearance Terminated**
Comment:	**Motion: 13 Sequence: 0 Create Initials: SK Create Date: 09/02/2016 SATD - Attorney Appearance Terminated Philip L Gundlach Filed: 09/02/2016 Party: PLT PartyNum: 1 PartyName: Theneshia Glaze**

File Date: **12/20/2017**
Document Name: **Motion/Petition to Modify (Summons)**
Comment: **Child Support**

File Date: **12/20/2017**
Document Name: **Financial Statement**

Comment:

File Date: **12/20/2017**
Document Name: **Reopen**
Comment: **for Motion to Modify Child Support**

File Date: **12/20/2017**
Document Name: **Summons Issued (Service Event)**
Comment: **Forwarded to CCSO for Service. Money Order for Sheriff Submitted with Motion.**

File Date: **01/10/2018**
Document Name: **Sheriffs Return**
Comment: **Service for DEF**

File Date: **02/08/2018**
Document Name: **Answer**
Comment:

File Date: **02/27/2018**
Document Name: **Hearing Notice Issued**
Comment: **Notice of Settlement Conference sest for 03/28/2018 at 9am before Magistrate Cooley.**

File Date: **03/27/2018**
Document Name: **Correspondence**
Comment: **Requesting to Appear by Phone. Per Magistrate notation, MOOT**

File Date: **03/28/2018**
Document Name: **Title 4D Hearing Sheet**
Comment:

File Date: **04/02/2018**
Document Name: **Hearing Notice Issued**
Comment: **hearing set for 5/24/18 at 2pm. Notices sent by Magistrate's Office.**

File Date: **04/16/2018**
Document Name: **Returned/Undeliverable Mail**
Comment: **def returned mail**

File Date: **05/29/2018**

Document Name: **Child Support Guidelines Worksheet**
Comment:

File Date: **05/29/2018**
Document Name: **Title 4D Magistrate's Report and Recommendation**
Comment: **Findings And Recommendations Of The Family Magistrate from hearing on 5/24/18**

File Date: **06/06/2018**
Document Name: **Title 4D Order**
Comment: **Order Of Court. Ordered that the Findings and Recommendations of the Family Magistrate dated 05/24/18 are adopted and incorporated into this Order of Court. Copies to PLT, DEF, DSS/OSC**

File Date: **06/15/2020**
Document Name: **Returned Paper Filing Status Notice - MDEC Action**
Comment:

Service Information

Service Type	Issued Date
Writ of Summons	**04/04/2014**
Summons Issued	**12/20/2017**

This is an electronic case record. Full case information cannot be made available either because of legal restrictions on access to case records found in Maryland Rules, or because of the practical difficulties inherent in reducing a case record into an electronic format.

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Service Desk: (410) 260-1114

Filed 9/18/2025 1:24 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent	§	
ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

RESPONDENT'S ORIGINAL ANSWER TO PETITION FOR BILL OF REVIEW

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Theneshia Yvonne Glaze, Respondent in the above-entitled and numbered cause, and files this Original Answer to Petitioner's Bill of Review, and in support thereof respectfully shows the Court the following:

I. GENERAL DENIAL

Pursuant to *Rule 92 of the Texas Rules of Civil Procedure*, Respondent generally denies every allegation contained in Petitioner's Petition for Bill of Review, and demands strict proof thereof by a preponderance of the evidence as required by the laws of the State of Texas.

II. SPECIFIC DENIAL

Without waiving the foregoing general denial, Respondent specifically denies the following allegations and requests for relief contained in Petitioner's Petition, as follows:

1. **Denial of Extrinsic Fraud**
   Respondent denies that any fraud, accident, or wrongful act prevented Petitioner from fully participating in the original case, *In the Interest of J.V.G., a Child, 27th District Court, Lampasas County, Texas, Cause No. 19476.* Court records reflect that Petitioner

was aware of Respondent's prior marital status. Respondent denies that any misrepresentation during the original case occurred and demands strict proof of such allegations. Additionally, Petitioner complied with court-ordered genetic testing, which conclusively established Petitioner as the biological father. Petitioner did not contest the results.

2. **Denial of Non-Joinder Defect**
Respondent denies that the judgment is void due to failure to join a "necessary party." While Respondent's prior marriage ended within 301 days of the child's birth, creating a rebuttable presumption of paternity under *Tex. Fam. Code § 160.204(a)(2)*, that presumption was fully rebutted by court-ordered genetic testing, which confirmed Petitioner as the biological father. Court records reflect that Petitioner was aware of Respondent's prior marital status and had the opportunity to raise joinder issues during the proceeding, which he did not. Non-joinder does not constitute extrinsic fraud or render the judgment void.

3. **Denial of Meritorious Defense Based on Prior Marriage and Presumption Argument Under Tex. Fam. Code § 160.204**
Respondent denies that Petitioner has any meritorious defense to the finding of paternity based on Respondent's prior marriage. While Respondent was previously married, albeit geographically and legally separated, that marriage was dissolved four (4) months before the child's birth. Court records reflect that Petitioner was aware of Respondent's prior marital status. Moreover, Petitioner complied with court-ordered genetic testing, which conclusively established him as the biological father. Under *Tex. Fam. Code §§ 160.204* and *160.631*, any presumption of paternity arising from Respondent's prior marriage was fully rebutted by the genetic test results. Accordingly, Petitioner cannot establish a meritorious defense to the original judgment.

4. **Denial Regarding Ex-Husband as Necessary Party**
Respondent denies that Respondent's former husband is a necessary party to this Bill of Review proceeding. The ex-husband has no legal or factual role in the matters raised by Petitioner. Under *Texas Rule of Civil Procedure 39*, a necessary party is one whose presence is required to afford complete relief or protect their interest. The ex-husband does not meet this standard, and his attendance at any hearing in this matter is neither required nor appropriate.

5. **Denial of False Statement Allegation**
Respondent denies Petitioner's claim that Respondent "falsely stated the child has no presumed, acknowledged, or adjudicated father" in the original case. At the time of the original proceeding, Respondent's prior marriage had been dissolved four (4) months before the child's birth, and therefore, no presumed father existed under *Tex. Fam. Code § 160.204*. The pleadings in question were prepared and filed by Respondent's attorney of record, not by Respondent personally. In any event, the statement was legally correct at the time: the child had no acknowledged or adjudicated father until the court-ordered genetic testing confirmed Petitioner as the biological father. This allegation cannot support a Bill of Review.

6. **Denial of Custody Issues in Divorce Proceedings**
Respondent denies Petitioner's claim that custody of the child at issue in this case was

addressed during Respondent's divorce proceedings. The only child referenced in Respondent's divorce was the child shared with Respondent's ex-husband. The child at issue here was not included in those proceedings, and no custody or paternity orders relating to this child were entered in the divorce decree. Petitioner's allegation is false and does not support his claim for Bill of Review relief.

7. **Denial of Ongoing Deprivation Claim**
Respondent denies Petitioner's allegation that he has been prevented from establishing a relationship with the child. Respondent made reasonable efforts over the years to inform Petitioner of the child's welfare and to open a line of communication. Any lack of relationship is due to Petitioner's own inaction and not any fraud or interference by Respondent.

8. **Denial of Requested Relief**
Respondent denies that the original Suit Affecting the Parent-Child Relationship (SAPCR) should be vacated, that the Court should decline further jurisdiction under the UCCJEA, or that the matter should be transferred to Illinois. While the child now resides in Illinois and the Petitioner resides in Florida, the Texas court had proper jurisdiction over the original proceedings, and the paternity finding was supported by court-ordered DNA testing. Petitioner has no extrinsic fraud or meritorious defense warranting such relief. Florida is the home state for child support enforcement, and any request to vacate or transfer the case is without merit and should be denied.

9. **Denial of Relief Prohibiting Enforcement in Other Jurisdictions**
Respondent denies that the Court should issue any order prohibiting enforcement of the order in any other jurisdiction, including Florida. Petitioner's child support case is pending in Florida, which is the Petitioner's home state, and Florida has proper jurisdiction over Petitioner for child support enforcement. Texas does not have authority to control enforcement in Florida or Illinois, and Petitioner's request is beyond the Court's power and without merit.

10. **Denial of Evidentiary Hearing**
Respondent acknowledges that Petitioner requests an evidentiary hearing. Respondent denies that such a hearing is necessary, as the allegations in the Bill of Review are without merit and can be decided based on the existing record.

11. **Denial of Hyphenated Name**
Respondent denies that she is legally known by any hyphenated name as alleged by Petitioner. Any reference to such a name in Petitioner's filing is inaccurate; Respondent's legal name is Theneshia Yvonne Glaze.

12. **Denial of Concealed Information**
Respondent denies Petitioner's allegation that the divorce was concealed. The divorce was a matter of public record. Regardless, the status of the divorce has no bearing on the validity of the original paternity finding or the allegations in the Bill of Review.

III. REFERENCE TO EVIDENCE (NO EXHIBITS ATTACHED)

Respondent has not attached exhibits to this Answer. Respondent may rely on publicly filed court records, personal knowledge, or other evidence if requested by the Court or at any hearing scheduled on this matter.

IV. AFFIRMATIVE DEFENSES

1. **Statute of Limitations**
   Respondent asserts that Petitioner's Bill of Review is barred by the statute of limitations. Under *Tex. Civ. Prac. & Rem. Code § 16.051*, a Bill of Review must be filed within four (4) years after the judgment is signed, unless the judgment is void. Petitioner's filing is untimely and should be dismissed.

2. **No Extrinsic Fraud**
   Respondent denies that any extrinsic fraud occurred. Petitioner was aware of Respondent's prior marriage before and during the original proceedings. Petitioner complied with court-ordered genetic testing, which conclusively established him as the biological father. Any claim of nondisclosure is without merit.

3. **Improper Purpose and Delay of Child Support**
   Respondent asserts that Petitioner filed this Bill of Review for the improper purpose of delaying the enforcement of child support. Petitioner has previously filed multiple motions in Florida to delay child support proceedings, all of which were denied. Petitioner recently filed an **Emergency Motion to Stay Proceedings Pending Resolution of Texas Bill of Review** in Florida, **and the virtual hearing for this motion has been set for 31 October 2025 at 10:45am EST.** These frivolous motions have caused unnecessary delays and multiplied proceedings. Filing this Bill of Review in Texas constitutes an abuse of the judicial process and further supports dismissal.

4. **No Defect from Non-Joinder of Presumed Father**
   Petitioner argues the original order was defective due to non-joinder of a presumed father (Respondent's former husband). This argument fails. Under *Tex. Fam. Code § 160.204*, any presumption of paternity was rebutted by genetic testing, which confirmed Petitioner as the biological father. Petitioner complied with the court-ordered genetic testing and had the opportunity to raise any joinder issue at the time of the original proceeding. Non-joinder is not extrinsic fraud, does not deprive the court of jurisdiction, and does not render the judgment void. At most, it is an intrinsic matter that cannot support a Bill of Review.

V. RESPONSE TO PETITIONER'S PRAYER FOR RELIEF

Respondent specifically denies that Petitioner is entitled to any of the relief requested in his Bill of Review, including but not limited to setting aside prior orders, vacating established paternity, or interfering with child support enforcement. Respondent prays that all such relief be denied in its entirety.

VI. REQUEST FOR ATTORNEY'S FEES AND COSTS

Respondent retained counsel in Florida to pursue the establishment and enforcement of child support for the child. Filing was delayed due to Respondent not knowing Petitioner's physical location for several years. Once Petitioner's location was discovered, Respondent promptly filed the case in Florida, Petitioner's state of residence.

Petitioner's repeated frivolous motions in Florida and now in Texas have needlessly multiplied proceedings and directly increased Respondent's litigation costs. Respondent has been forced to expend attorney's fees in Florida solely as a result of Petitioner's improper tactics, and is now forced to defend against this baseless Bill of Review in Texas.

Accordingly, Respondent respectfully requests that this Court award her reasonable attorney's fees, costs, and expenses, including those incurred in Florida proceedings necessitated by Petitioner's conduct, pursuant to *Tex. Civ. Prac. & Rem. Code §§ 9.011–9.012, 10.001–10.004*, and the Court's inherent authority to sanction abusive litigation practices.

VII. PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that the Court:

1. Deny and dismiss Petitioner's Bill of Review, with prejudice;
2. Confirm the validity of the prior adjudication of paternity and related orders;
3. Award Respondent her reasonable attorney's fees, costs, and expenses, including those incurred in Florida, pursuant to *Tex. Civ. Prac. & Rem. Code §§ 9.011–9.012, 10.001–10.004*, and the Court's inherent authority to sanction abusive litigation practices;
4. Set this matter for hearing as soon as practicable and expedite consideration of the Bill of Review; and
5. Grant Respondent such other and further relief, at law or in equity, to which she may be justly entitled.

VIII. SIGNATURE AND VERIFICATION

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.

Executed on this **18th day of September 2025**, by:

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE
Respondent, Pro Se
1610 Stonebrooke Drive
Edwardsville, IL 62025
theneshia03@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **RESPONDENT'S ORIGINAL ANSWER TO PETITION FOR BILL OF REVIEW** was served on Petitioner, Richard K. Badu, Pro Se at 123 Aspire Dr. Kissimmee, FL 34747, Richard.badu@protonmail.com, on this **18th day of September 2025**, by:

☒ Certified Mail, Return Receipt Requested
☐ Email (by consent)
☐ Hand Delivery
☒ eFileTexas Electronic Service

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE
Respondent, Pro Se
1610 Stonebrooke Drive
Edwardsville, IL 62025
theneshia03@gmail.com

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Status as of 9/19/2025 10:54 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Theneshia YvonneGlaze		theneshia03@gmail.com	9/18/2025 1:24:55 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	9/18/2025 1:24:55 PM	SENT
Richard K.Badu		richard.badu@protonmail.com	9/18/2025 1:24:55 PM	SENT

Filed 9/18/2025 1:24 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent	§	
ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

RESPONDENT'S MOTION TO DISMISS PETITIONER'S BILL OF REVIEW

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Theneshia Yvonne Glaze, Respondent, respectfully moves this Court to dismiss Petitioner's Bill of Review for failure to state a valid claim upon which relief can be granted, and in support thereof would show the Court the following:

I. Nature of the Case

Petitioner seeks to set aside a prior adjudication of paternity through a Bill of Review. Petitioner alleges he was unaware of Respondent's prior marriage. Petitioner's claim fails as a matter of law because:

1. He was fully aware of Respondent's prior marriage;
2. DNA testing confirmed his paternity;
3. He had a full and fair opportunity to be heard in prior proceedings, and
4. His Bill of Review is time-barred.

II. Legal Standard

A Bill of Review is an extraordinary remedy, available only when a petitioner demonstrates:

1. A meritorious defense;

2. That he was prevented from asserting it due to fraud, accident, or wrongful act of the opposing party; and
3. He was not at fault or negligent. *Caldwell v. Barnes, 154 S.W.3d 93, 96 (Tex. 2004).*

Only **extrinsic fraud** that prevented participation in the original proceeding may support a Bill of Review. *King Ranch, Inc. v. Chapman, 118 S.W.3d 742, 752 (Tex. 2003).*

The burden is strictly on the Petitioner, and failure to establish *each* element requires dismissal.

III. Statute of Limitations

A Bill of Review must be filed within **four (4) years** of the judgment being challenged. *Tex. Civ. Prac. & Rem. Code § 16.051.* In family law cases involving paternity, a party must challenge adjudication within **one (1) year** unless newly discovered genetic evidence exists. *Tex. Fam. Code § 160.609.*

Here, DNA testing conclusively established paternity, and Petitioner was adjudicated the father, and no newly discovered genetic evidence exists. Petitioner's Bill of Review is therefore untimely.

IV. Failure as a Matter of Law

Petitioner's Bill of Review fails as a matter of law because paternity was conclusively adjudicated through court-ordered DNA testing in the prior proceedings (*In the Interest of J.V.G., a Child, 27th District Court, Lampasas County, Texas, Cause No. 19476).* Texas law prohibits relitigation of adjudicated paternity in a Bill of Review absent newly discovered genetic evidence, which does not exist here.

V. Failure to State a Claim/Extrinsic Fraud Not Alleged

Petitioner alleges he was unaware of the respondent's prior marriage; however, the record shows he was fully aware before the original proceedings. This does not constitute extrinsic fraud. Petitioner's allegations, even if taken as true for purposes of this motion, do not constitute extrinsic fraud and therefore do not support a Bill of Review.

VI. Pattern of Delay

Petitioner has repeatedly filed unsuccessful motions in Florida to challenge child support enforcement – all motions denied. The present Bill of Review appears to be another attempt to delay his obligations and should be dismissed.

VII. Objection to Initial Disclosures and Discovery

Respondent objects to any required initial disclosures or discovery at this time, as the Petitioner's Bill of Review is subject to dismissal under Respondent's Motion to Dismiss. Requiring disclosures or discovery before a ruling on dismissal would be **premature, unnecessary, and burdensome** because the Bill of Review fails to meet the legal standard for extrinsic fraud and

other elements necessary to proceed. Respondent reserves the right to comply with any discovery or disclosures **if and only if** the Court denies the Motion to Dismiss and allows the case to proceed.

VIII. Dismissal of Proposed Necessary Party

Respondent respectfully requests that the Court dismiss **Eric L. Glaze** as a Necessary Party. He has no legal or factual role in this Bill of Review proceeding. Under *Texas Rule of Civil Procedure 39*, a necessary party is one whose presence is required to afford complete relief or to protect their interest. Eric L. Glaze does not meet this standard. His attendance at any hearing or participation in this action is neither required nor appropriate.

IX. Prayer

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that the Court:

1. Grant this Motion;
2. Dismiss Petitioner's Bill of Review with prejudice;
3. Dismiss Eric L. Glaze as a Necessary Party;
4. Award Respondent costs and fees incurred in defending against this proceeding, as justice requires; and
5. Grant such other relief to which Respondent may be justly entitled.

Respectfully submitted,

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE
Respondent, Pro Se
1610 Stonebrooke Drive
Edwardsville, IL 62025
theneshia03@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Dismiss was served on Petitioner, Richard K. Badu, Pro Se at 123 Aspire Dr. Kissimmee, FL 34747, Richard.badu@protonmail.com, on this **18th day of September 2025,** by:

☒ Certified Mail, Return Receipt Requested
☐ Email (by consent)
☐ Hand Delivery
☒ eFileTexas Electronic Service

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE

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Richard K.Badu		richard.badu@protonmail.com	9/18/2025 1:24:55 PM	SENT

Filed 9/22/2025 10:37 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Dasia Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent, ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

PETITIONER'S RESPONSE IN OPPOSITION TO RESPONDENT'S MOTION TO DISMISS

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner, Richard K. Badu, appearing pro se, respectfully files this Consolidated Response in Opposition to Respondent's Motion to Dismiss and would show the Court as follows:

Pursuant to Texas Rule of Civil Procedure 21c, the minor child who is the subject of this suit is referred to by the initials J.V.G.

I. INTRODUCTION

Respondent seeks dismissal while avoiding the central defect of the 2016 judgment: it was procured by **extrinsic fraud**. By swearing in her SAPCR petition that the child had "no presumed father," Respondent concealed the existence of **Eric L. Glaze**, a presumed father under Texas Family Code §160.204.

This concealment deprived the Court of jurisdiction over a **necessary party** and denied Petitioner a fair opportunity to contest parentage. Texas law does not bless a judgment obtained through structural fraud. Respondent's Motion to Dismiss is without merit and must be denied.

II. STANDARD

To the extent Respondent proceeds under **Rule 91a,** dismissal is proper only when the pleading has **no basis in law or fact**, with all well-pleaded facts taken as true and construed in the non-movant's favor. A **Bill of Review** is an equitable action; relief is available when the petitioner (1) has a **meritorious defense**, (2) was **prevented** from asserting it by the **fraud, accident, or wrongful act** of the opposing party, and (3) the failure was **unmixed with the petitioner's own negligence**. See **Caldwell v. Barnes**, 975 S.W.2d 535, 537 (Tex. 1998); **King Ranch, Inc. v. Chapman**, 118 S.W.3d 742, 751 (Tex. 2003).

III. ARGUMENT & AUTHORITIES

A. Concealment of a Presumed Father Constitutes Extrinsic Fraud

As established by the standard above, Petitioner must prove three elements. He meets every element, beginning with the Respondent's extrinsic fraud that prevented him from asserting his meritorious defense.

1. **Presumption of Paternity is Undisputed.**
   The child was born **October 10, 2014**, just **120 days** after Respondent's Maryland divorce from Eric L. Glaze on June 12, 2014. Under **Tex. Fam. Code §160.204(a)(2)**, Mr. Glaze is a **presumed father by operation of law**.

2. **Mandatory Joinder Was Ignored.**
   Tex. Fam. Code §§160.603–.604 required Eric L. Glaze to be joined as a party in the 2016 adjudication. This was not optional; it was a jurisdictional prerequisite.

3. **Respondent's False Statement.**
   Respondent swore in her 2015 SAPCR that the child had "no presumed father." That statement was **materially false**. Her Answer confirms the divorce and birth timeline that prove its falsity. Her attempt to shift blame to her attorney is unavailing; "[s]tatements of an attorney in pleadings are admissions of the client." *Johnson v. Andrews*, 9 S.W.3d 123, 129 (Tex. App.—Houston [14th Dist.] 1999).

   Filing a knowingly false statement in a judicial proceeding also constitutes **aggravated perjury** under Tex. Penal Code §37.03, which is classified as a third-degree felony punishable under Tex. Penal Code §12.34 by 2–10 years confinement and a fine up to $10,000. While Petitioner does not seek criminal sanctions, the seriousness of Respondent's conduct underscores why equity cannot sustain the 2016 judgment.

4. **The Fraud Was Extrinsic.**
   Concealment of a necessary party kept the Court from acquiring jurisdiction over Eric Glaze and prevented a fair adversarial process. This is the classic definition of **extrinsic fraud**. *Montgomery v. Kennedy*, 669 S.W.2d 309, 312 (Tex. 1984).

B. DNA Testing Cannot Retroactively Cure Jurisdictional Defects

Respondent argues that DNA testing "rebutted" the presumption of paternity. This is legally irrelevant. A presumption may only be rebutted in a valid proceeding with **all necessary parties joined**. Fraudulently omitting a presumed father and then claiming DNA evidence later validated the result cannot cure the jurisdictional defect. *In re E.R.*, 385 S.W.3d 552, 566 (Tex. 2012).

C. Limitations Are Tolled by Fraudulent Concealment

Respondent claims this action is untimely. This fails. Texas law tolls limitations where fraud prevents discovery. *Browning v. Prostok*, 165 S.W.3d 336, 349 (Tex. 2005).

- Petitioner had **no verifiable knowledge** of Respondent's prior marriage or of Eric Glaze's presumed status. He reasonably relied on Respondent's sworn statement that no presumed father existed.
- Petitioner discovered the concealed Maryland divorce and the presumption on **August 5, 2025**, during Florida child support proceedings. He filed this Bill of Review within ten days.

This is diligence, not negligence.

D. Respondent's Credibility is Destroyed by a Pattern of Misrepresentation

In her verified Answer, Respondent denies under penalty of perjury that she is known by a hyphenated name. This sworn statement is demonstrably false, as proven by the collection of public records attached hereto as **Exhibit A**. The evidence shows Respondent actively and consistently uses a hyphenated name in her professional life across multiple platforms.

This is not a minor inconsistency; it is a calculated falsehood. As shown in **Exhibit A**, Respondent markets herself across multiple platforms as either "**Theneshia Culpepper-Glaze**" or "**Theneshia Glaze-Culpepper.**" This includes:

- Her official realtor profiles with Coldwell Banker Brown Realtors.
- Her personal realtor website, where the URL itself contains the hyphenated name.
- Other professional real estate platforms, such as Brevitas.
- Her public profile as a running coach, where she is identified as "Theneshia Glaze-Culpepper."

This easily verifiable falsehood, made under oath about the simple matter of her own name, demonstrates a clear pattern of misrepresentation. It fatally undermines her credibility on all other matters before this Court. If Respondent is willing to mislead the Court on such a basic fact, her self-serving denials regarding the extrinsic fraud that corrupted the original judgment cannot be considered credible.

E. Respondent's Request for Attorney's Fees is Meritless

Respondent requests that the Court order Petitioner to pay her attorney's fees, including those from a separate Florida action, as a sanction. This request should be denied for two primary reasons.

First, this Bill of Review, grounded in documented extrinsic fraud and mandatory joinder statutes, is a necessary and proper equitable action. It is not a frivolous or bad-faith pleading that would warrant sanctions under the Texas Civil Practice and Remedies Code.

Second, and more importantly, equity does not reward a party whose own fraudulent conduct is the sole reason for the current litigation. It was Respondent's false statement in the original proceeding that created the defective judgment, forcing Petitioner to seek this remedy. To award her fees would be to sanction the very fraud this Court is being asked to correct.

IV. EQUITY & THE BEST INTERESTS OF THE CHILD

Texas law elevates the **best interest of the child** as the Court's primary consideration. See **Tex. Fam. Code § 153.002.** Here, equity and best interests align with correcting the 2016 error:

- **No bonding or relationship:** Petitioner has **never met** J.V.G., has **never been treated as** or called "father/dad," and has **never functioned** as a parent in any capacity.
- **Child's surname:** J.V.G. carries **Eric Glaze's surname,** which **reinforces the statutory presumption** and the practical understanding of who the law presumed to be father.
- **Child's age (nearly 11):** Undoing a misdirected 2016 adjudication does not sever or destabilize any parent-child relationship, because none has ever existed between Petitioner and J.V.G. Instead, it restores legal integrity consistent with the reality the child has always lived.
- **Fairness and due process:** Enforcement of a judgment procured by concealing a presumed father **warps** parentage law and risks misallocating legal and financial obligations contrary to both equity and best interests.

Correcting an adjudication produced by **extrinsic fraud;** with **no countervailing bond to destabilize;** is exactly what a court of equity should do.

V. PRAYER

WHEREFORE, Petitioner respectfully prays that the Court:

1. **DENY** Respondent's Motion to Dismiss in its entirety;
2. **DENY** Respondent's request for attorney's fees;
3. Alternatively, **grant leave to amend** if the Court believes any additional factual detail is warranted;
4. Set this matter for an **evidentiary hearing on the merits** of the Bill of Review (or hear merits contemporaneously with any dismissal hearing); and
5. Grant such other and further relief, at law or in equity, to which Petitioner may be justly entitled.

Respectfully submitted,

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

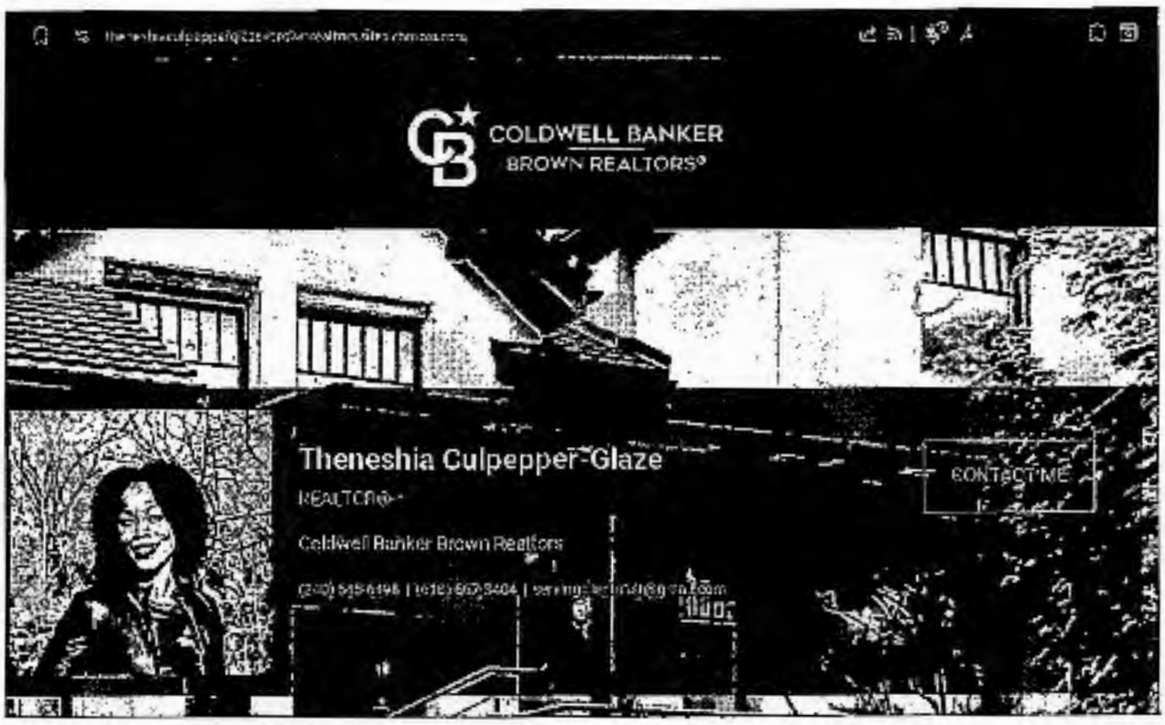
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on Respondent, Theneshia Yvonne Glaze, at the email address provided in her filings (theneshia03@gmail.com), via the electronic service system (eFileTexas.gov) and by email, on this 22nd day of September, 2025.

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

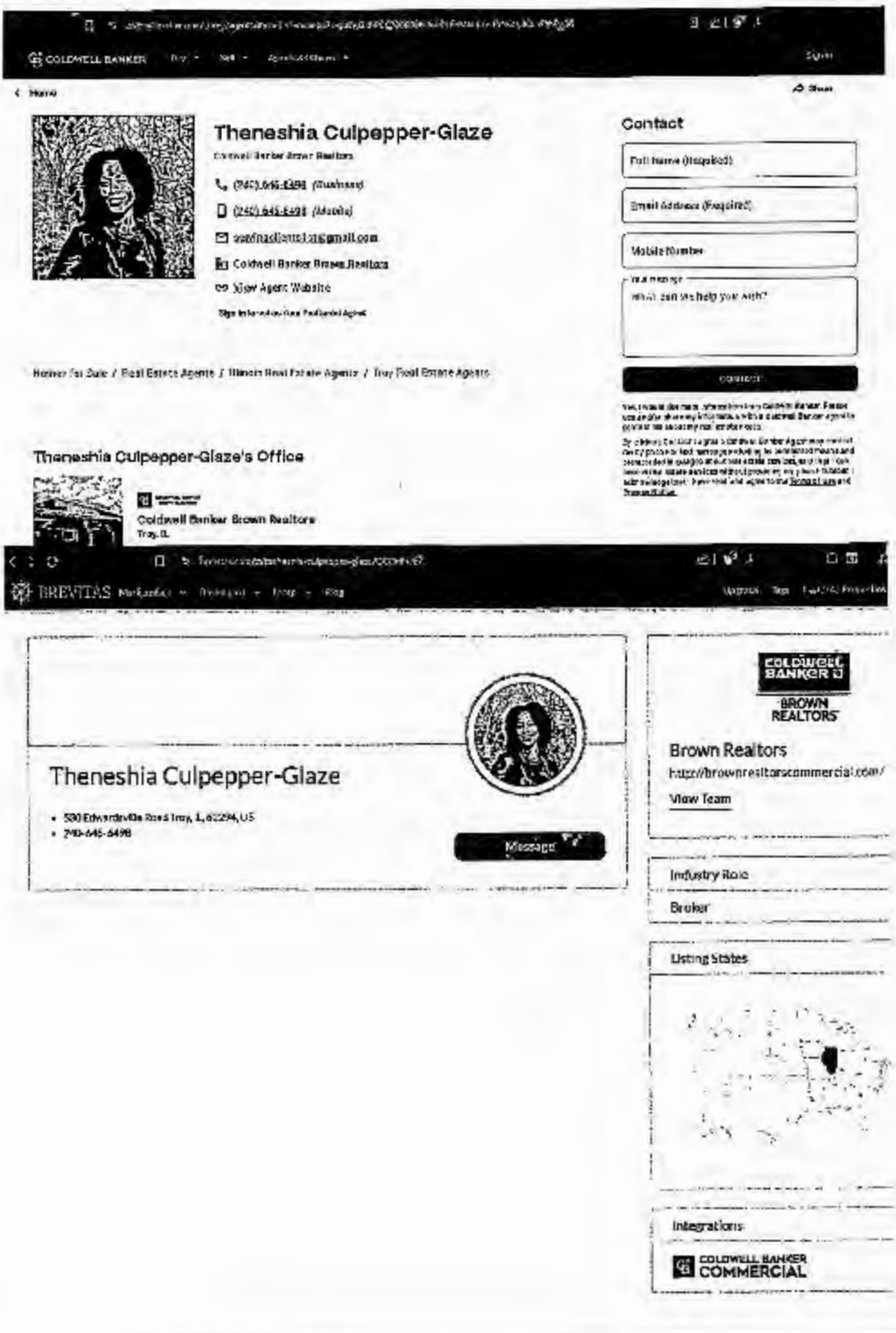
"EXHIBIT A"

- Her official realtor profiles with Coldwell Banker Brown Realtors.





- Her personal realtor website, where the URL itself contains the hyphenated name.


COLDWELL BANKER
Sign In
Home
Theneshia Culpepper-Glaze
Coldwell Banker Brown Realtors
(240) 645-6498 (Business)
(240) 645-6498 (Mobile)
Coldwell Banker Brown Realtors
View Agent Website
Contact
Full Name (Required)
Email Address (Required)
Mobile Number
What can We help you with?
Connect
Home for Sale / Real Estate Agents / Illinois Real Estate Agents / Troy Real Estate Agents
Theneshia Culpepper-Glaze's Office
Coldwell Banker Brown Realtors
Troy, IL
BREVITAS
Theneshia Culpepper-Glaze
530 Edwardsville Road Troy, IL 62294, US
240-645-6498
Message
COLDWELL BANKER
BROWN
REALTORS
Brown Realtors
http://brownrealtorscommercial.com/
View Team
Industry Role
Broker
Listing States
Integrations
COLDWELL BANKER
COMMERCIAL

- Her public profile as a running coach, where she is identified as "Theneshia Glaze-Culpepper."

With their wealth of knowledge and expertise, the three Game Changer coaches we're talking to today are here to help you unlock your full potential on the track.

Almetria Turner: A Multi-Hyphenate Wellness DisruptHER, Doula, and Health Equity Advocate, Almetria is certified in various disciplines, including distance run coaching and track and field coaching. She's the owner of Fit and Finally Free, RunHer Performance, and Roots and River Wellness, empowering individuals to lead healthier lifestyles.

Theneshia Glaze-Culpepper (Coach T): Coach T, as she's fondly known, is a RRCA certified run coach, Cross-Country coach, and a Level 1 USA Track & Field Coach. She brings her passion as an official racer and run coach to the table, helping runners achieve their goals.

Tiffany Martin: With over 35 years of running experience, Tiffany is a certified USATF and NFHS Track and Field and Cross-Country Coach. As a mentor coach for Game Changers, she's dedicated to creating inclusive and equitable experiences for all runners.

CHALLENGE: Take Part in Brooks' May 5K

Why Track Workouts?

Track workouts offer a myriad of benefits, from improving speed and strength to enhancing running efficiency and form. Almetria emphasizes that "track workouts can be adapted to fit all levels of running, plus it gives runners an opportunity to change up their scenery, route, running surface and type of workouts."



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Status as of 9/22/2025 11:10 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	9/22/2025 10:37:00 AM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	9/22/2025 10:37:00 AM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	9/22/2025 10:37:00 AM	SENT

Filed 9/29/2025 12:00 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent, ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

FIRST AMENDED ORIGINAL PETITION FOR BILL OF REVIEW

TO THE HONORABLE JUDGE OF SAID COURT:
This petition is verified. See Unsworn Declaration.

COMES NOW, Richard K. Badu, Petitioner, appearing pro se, and respectfully files this First Amended Original Petition for Bill of Review to set aside the April 27, 2016 Order Establishing the Parent-Child Relationship in Cause No. 19476.

This First Amended Petition amends and supersedes the Original Petition previously filed in this cause.

This filing complies with **Texas Rule of Civil Procedure 21c; the minor child is referred to herein only by the initials J.V.G. and birth date with month and year.**

In support thereof, Petitioner would show the Court as follows:

I. DISCOVERY LEVEL AND PARTIES

1. Discovery in this matter shall be conducted under Level 2 pursuant to Rule 190 of the Texas Rules of Civil Procedure.
2. Petitioner, **Richard K. Badu**, was the Respondent in the original Suit Affecting the Parent-Child Relationship ("SAPCR") under this Cause Number. The last three

digits of Petitioner's driver's license are **540**, and the last three digits of his Social Security number are **937**. Petitioner's legal domicile is **Orlando, Florida**.

3. Respondent, **Theneshia Yvonne Glaze (also known as Theneshia Y. Culpepper-Glaze)**, is an individual and was the Petitioner in the original SAPCR. Her last known address is 1610 Stonebrooke Drive, Edwardsville, IL 62025.

4. **Eric L. Glaze, a presumed father of the child**, is a Proposed Necessary Party. The last known address for Eric Glaze from the Maryland divorce proceedings (**Case No. 08-C-14-000839**) was 11211 F Heron Lane, Waldorf, MD 20603. Petitioner, however, has recently discovered through diligent investigation that Eric Glaze's current address is believed to be 6438 Ocelot St, Waldorf, MD 20603.

II. JURISDICTION AND VENUE

5. This Court retains continuing, exclusive jurisdiction over the parent-child relationship under Texas Family Code §155.001 because it rendered the 2016 order.

6. A bill of review attacking the Texas judgment properly lies in this court. The Court has personal jurisdiction over Petitioner (by filing) and Respondent (as original SAPCR petitioner).

7. Venue is proper in Lampasas County pursuant to Texas Civil Practice and Remedies Code §15.002(a)(1).

III. LEGAL STANDARDS

8. This Bill of Review is governed by the equitable standards requiring proof of:
    a) a meritorious defense,
    b) that Petitioner was prevented from asserting it by the opposing party's fraud, and
    c) that this was unmixed with Petitioner's own fault. See Caldwell v. Barnes, 975 S.W.2d 535 (Tex. 1998); King Ranch, Inc. v. Chapman, 118 S.W.3d 742, 751–52 (Tex. 2003) (distinguishing extrinsic from

intrinsic fraud). In the Interest of Child v. H.C. (2022), the appellate court emphasized that a misstatement regarding parentage within a proceeding is intrinsic fraud, which does not support a Bill of Review because it could have been litigated initially. In contrast, **Petitioner's case involves extrinsic fraud: Respondent deliberately concealed her divorce and the presumed father's identity**, preventing any meaningful opportunity to defend. This structural misconduct justifies equitable relief under a Bill of Review.

IV. NATURE OF SUIT AND STATUTE OF LIMITATIONS

9. This is a direct, equitable action to set aside the April 27, 2016 "Order Establishing the Parent-Child Relationship" (of which Petitioner requests this Court take judicial notice).

10. Although more than four years have elapsed, Petitioner asserts that the four-year statute of limitations for this action, pursuant to Tex. Civ. Prac. & Rem. Code §16.051, has been equitably tolled by Respondent's extrinsic fraud. Petitioner pleads that this action was filed within a reasonable time after the discovery of said fraud.

11. This is not a paternity challenge under Tex. Fam. Code §160.607, but a direct equitable attack on the 2016 judgment based on extrinsic fraud. The limitations question is governed by equitable principles, and the residual four-year period is subject to tolling.

V. MERITORIOUS DEFENSE TO ORIGINAL ACTION

12. Petitioner has a meritorious defense to the finding that he is the father of the minor child, **J.V.G, born October 2014**.

13. On **April 4, 2014**, Respondent, **Theneshia Yvonne Glaze**, filed a Complaint for Absolute Divorce against **Eric L. Glaze** in the Circuit Court for Charles County, Maryland (**Case No. 08-C-14-000839**). The Maryland docket reflects that the divorce was finalized on **June 12, 2014**, and that the child in this case was born af-

ter the divorce was granted. Subsequent docket entries in 2018 show "Custody or Visitation Issues" being addressed in the same Maryland case. While the docket does not specify which child or children were the subject of the 2018 custody/visitation proceeding, it nonetheless demonstrates that **Eric L. Glaze** remained active in Maryland family litigation after the Texas SAPCR was filed, confirming that he was a known and locatable party.

14. The **Judgment of Absolute Divorce** was entered on **June 12, 2014**. The **birth of the child in October 2014** occurred **120 days after the divorce judgment**, well within the **301-day statutory window under Tex. Fam. Code §160.204(a)(2)**, creating a **legal presumption that Eric L. Glaze is the child's father.**

15. The Maryland docket further shows that **Eric L. Glaze** was served with process, filed an Answer on **April 15, 2014**, and participated in the divorce proceeding. He was therefore a known, locatable, and **legally presumed father at the time the Texas SAPCR was filed**.

16. Under **Tex. Fam. Code §§160.603 and 160.604**, a presumed father is a necessary party to any proceeding to adjudicate the parentage of a child. **The Texas court was required to join Eric L. Glaze before issuing any order establishing another man's parentage.**

17. Because **Eric L. Glaze** was not joined, the April 27, 2016 order was rendered without jurisdiction over all necessary parties, resulting in a defective and voidable judgment.

18. This Court was not made aware of Eric Glaze's legal presumption of paternity and therefore proceeded in error. The Original Order was issued without joinder of a necessary party, rendering it defective.

VI. EXTRINSIC FRAUD AND DUE PROCESS VIOLATION

19. Petitioner was prevented from presenting this defense due to Respondent's extrinsic, collateral fraud.

20. In her **January 23, 2015 *First Amended Petition* in this SAPCR**, Respondent falsely swore: "The child, J.V.G, **has no presumed, acknowledged, or adjudicated father.**"

21. This statement was materially false. At the time she filed this sworn pleading in Texas, Respondent:
a. Had recently obtained a divorce from **Eric L. Glaze** in Maryland;
b. Had addressed custody or visitation issues regarding the child in that Maryland proceeding; and
c. Knew that the child's birth date fell within the **301-day presumption period**, making ***Eric L. Glaze* the presumed father under Tex. Fam. Code §160.204(a)(2)**.

22. The Maryland court record confirms that Respondent knew the whereabouts of **Eric L. Glaze**, as he had been personally served, filed an Answer, and actively participated in the Maryland case.
23. Respondent's misrepresentation was outcome-determinative because it prevented the Texas court from applying the mandatory presumption of paternity and joinder provisions of Tex. Fam. Code Chapter 160. This omission corrupted the framework of the proceeding and denied Petitioner a fair opportunity to defend against the establishment of parentage.
24. The **fraud was extrinsic** in nature because it kept the Texas court from considering an indispensable party and deprived Petitioner of a meaningful opportunity to assert a complete defense. This structural defect is not cured by the passage of time and warrants equitable relief through this Bill of Review.

VII. NO FAULT OR NEGLIGENCE BY PETITIONER

25. Petitioner's failure to present his defense was unmixed with any fault or negligence. He had no verifiable knowledge of Respondent's prior marriage and relied entirely on her sworn statement. The Maryland record was not reasonably discoverable at the time due to out-of-state docket unfamiliarity, lack of identifying information to run targeted searches, and reliance on Respondent's sworn statements.

26. Petitioner exercised diligence but did not discover the fraud until August 5, 2025. While preparing for, and in the aftermath of, a July 23, 2025 hearing in a Florida child support proceeding (Case No. 48-2024-DR-009444-O), Petitioner conducted independent research that led to the discovery of previously concealed information.

27. Petitioner filed this Petition within a reasonable time after discovery.

VIII. DEPRIVATION OF FAIR OPPORTUNITY AND ONGOING HARM

28. As a direct result of Respondent's collateral misrepresentation, Petitioner was denied his day in court on the parentage framework and has been **prevented from establishing any relationship with the child. Petitioner has never met the child, who is now nearly 11 years old**. The same misrepresentation that corrupted the framework also produced ongoing deprivation. Equity should not allow a judgment rooted in a structural defect to stand where the petitioner acted promptly upon discovery.

IX. NO OTHER ADEQUATE LEGAL REMEDY

29. Petitioner had no opportunity to appeal or move for a new trial, as the fraud was not discovered in time.

X. PRAYER FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue citation to **Theneshia Yvonne Glaze** and **Eric Lemont Glaze**;
2. Set this matter for an evidentiary hearing;
3. Vacate the April 27, 2016 SAPCR order in Cause No. 19476;
4. Upon vacating the SAPCR, decline further jurisdiction under the **UCCJEA** and transfer the matter to Illinois as the more convenient forum under **Texas Family Code § 152.207** (Mother and Child are residence of Illinois of more than 10 years);
5. **In the alternative, if the Court retains jurisdiction:**
   a. Reopen the issue of parentage under **Texas Family Code Chapter 160** and join **Eric L. Glaze** as a party;

b. Order genetic testing under **Texas Family Code § 160.502**; and
c. Permit alternative service under **Rule 106** if necessary;

6. Order Respondent to pay attorney's fees, costs, and expenses as appropriate;
7. Issue an order prohibiting enforcement of the vacated Texas order in any other jurisdiction, including Florida (**Case No. 48-2024-DR-009444-O**); and
8. Grant such other and further relief to which Petitioner is justly entitled.

UNSWORN DECLARATION

My name is Richard K. Badu, my date of birth is July 14, 1980, and my address is 123 Aspire Dr., Kissimmee, FL 34747.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Orange County, Florida, on September 27, 2025.

EXHIBITS

- **Exhibit A**: True and correct printout from the Maryland Judiciary Case Search for **Case No. 08-C-14-000839** (Charles County Circuit Court), **Theneshia Y. Glaze v. Eric L. Glaze**.
  This docket is publicly accessible and can be independently verified by the Court at:
  https://casesearch.courts.state.md.us/casesearch/
  (Search: Court System –> Circuit Court; County –> Charles; Case Number: **08C14000839**)

Respectfully submitted,

By: /s/ Richard K. Badu
Richard K. Badu, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 106163306
Filing Code Description: Amended Filing
Filing Description: First Amended `Original Petition for Bill of Review
Status as of 9/29/2025 8:21 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	9/27/2025 1:53:31 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	9/27/2025 1:53:31 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	9/27/2025 1:53:31 PM	SENT

Filed 10/7/2025 3:57 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Deeta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent, ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

MOTION FOR ENTRY OF DEFAULT AND TO DEEM ERIC L. GLAZE IN DEFAULT

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner, Richard K. Badu, appearing pro se, respectfully moves for entry of default against **Eric L. Glaze**, a presumed father and necessary party to this Bill of Review, and would show the Court as follows:

I. SERVICE OF PROCESS

1. On September 15, 2025, **Eric L. Glaze** was personally served at 6438 Ocelot Street, Waldorf, Maryland 20603, with a true and correct copy of the **Citation** and **Original Petition for Bill of Review**, as confirmed by the Affidavit of Service filed with this Court on September 18, 2025 (Proof of Service by Yvette Butler, Waldorf Legal Services, LLC)

   Exhibit A: Proof of Service_Eric Glaze.

2. The citation was properly issued and served in accordance with **Texas Rules of Civil Procedure 99, 106, and 107**, and more than twenty (20) days have elapsed since the date of service.

II. FAILURE TO APPEAR OR ANSWER

3. As of October 6, 2025, Eric L. Glaze has not filed an Answer, made any appearance, or otherwise responded to the Citation and Petition.
4. Eric L. Glaze also failed to appear at the October 2, 2025 hearing on the Bill of Review.
5. Accordingly, he is **wholly in default** under **Texas Rule of Civil Procedure 239**, and his default should be entered of record.

III. LEGAL BASIS

6. Under Rule 239, when a defendant has been duly served and fails to file an answer within the time allowed by law, the plaintiff is entitled to judgment by default.
7. Entry of default here is particularly important because Eric L. Glaze is a statutorily **presumed father** under Texas Family Code §160.204(a)(2). His default therefore satisfies the requirement that he be joined and afforded an opportunity to respond in this Bill of Review.
8. Having been served and afforded due process, his non-response removes any jurisdictional impediment to the Court's ruling on the Bill of Review and vacating the 2016 order.

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that the Court:

1. Find that Eric L. Glaze was duly served on September 15, 2025;
2. Find that the time for filing an Answer expired on October 6, 2025;
3. Enter of record that Eric L. Glaze is in default under Rule 239; and
4. Grant such other and further relief in law or in equity to which Petitioner may be justly entitled.

Respectfully submitted,

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion for Entry of Default Against Eric L. Glaze has been served on the following parties via the Texas eFile system and by email on this 7th day of October, 2025:

- **Theneshia Yvonne Glaze**, Respondent, at *theneshia03@gmail.com*
- **Eric L. Glaze**, Necessary Party, at *ericglaze11@hotmail.com*

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 106561305
Filing Code Description: Motion (No Fee)
Filing Description: Motion for Entry of Default and to Deem Eric L. Glaze in Default
Status as of 10/9/2025 12:34 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	10/7/2025 3:57:26 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	10/7/2025 3:57:26 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	10/7/2025 3:57:26 PM	SENT

Filed 10/10/2025 11:43 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Nichol Roberts

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent	§	
ERIC L. GLAZE, Proposed Necessary Party	§	LAMPASAS COUNTY, TEXAS

RESPONDENT'S OBJECTION TO PETITIONER'S MOTION FOR ENTRY OF DEFAULT AND TO DEEM ERIC L. GLAZE IN DEFAULT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Theneshia Yvonne Glaze, Respondent, respectfully submits this Objection to Petitioner's Motion for Default Judgment, and in support thereof respectfully states the following:

1. On 7 October 2025, Petitioner filed a Motion for Default Judgment against Eric Glaze due to his failure to file an Answer to the Petition for Bill of Review, and the Petitioner asserts that Eric Glaze's non-response removes any jurisdictional impediment to vacating the 2016 order, which is legally inaccurate under Texas Law. Entry of a default judgment against Eric Glaze would not relieve Petitioner of his burden to prove the required elements of a Bill of Review under Texas law, nor would it affect the substantive issues already presented and argued before this Court.

2. While Petitioner may have the procedural right to request a default against a non-responding party, this Motion is **untimely, procedurally improper, and unnecessary**. The Court has already conducted a hearing (02 October 2025) on the Bill of Review, at which all parties were afforded due process, and the matter was taken under advisement by the Court.

3. Importantly, Eric Glaze was **not in default at the time of the hearing**, and Petitioner's filing of this motion **after the hearing** appears to be an attempt to supplement or influence the Court's pending ruling. The timing of the motion further underscores its lack of procedural necessity and fairness.

4. Furthermore, the Respondent's appearance and opposition preserve this Court's obligation to evaluate the Bill of Review on its merits. Texas courts have consistently held that when one defendant defaults and another answers, the plaintiff must still prove his case as to the answering party. A default by one party does not bind or affect the rights of another who has appeared, ***Frymire Engineering Co. v. Grantham*, 524 S.W.2d 680 (Tex. 1975)**.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully requests that this Court **deny or disregard Petitioner's Motion for Default Judgment** as untimely, procedurally improper, and moot, and for such other and further relief to which Respondent may be justly entitled.

Respectfully submitted,

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE
Respondent, Pro Se
1610 Stonebrooke Drive
Edwardsville, IL 62025
theneshia03@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Respondent's Response to Petitioner's Motion for Default Judgment was served on Petitioner, Richard K. Badu, Pro Se, to the email address provided in his filings, Richard.badu@protonmail.com, and through the eFileTexas Electronic Service on this **10th day of October 2025**, by:

☒ Email

☒ eFileTexas Electronic Service

/s/ THENESHIA YVONNE GLAZE
THENESHIA YVONNE GLAZE

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 106702377
Filing Code Description: Answer/Response
Filing Description: Respondent's objection/response to Petitioner's Motion for Default Judgment
Status as of 10/14/2025 9:43 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	10/10/2025 11:43:46 AM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	10/10/2025 11:43:46 AM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	10/10/2025 11:43:46 AM	SENT

Filed 10/28/2025 3:41 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NUMBER 25DC23996

RICHARD K. BADU	**IN THE DISTRICT COURT**
VS.	**27TH JUDICIAL DISTRICT**
THENESHIA YVONNE GLAZE	**LAMPASAS COUNTY, TEXAS**

MEMORANDUM RULING

This case came before the Court on October 2, 2025. Petitioner, Richard K. Badu, appeared in person as a self-represented litigant. Respondent, Theneshia Yvonne Glaze, appeared in person as a self-represented litigant. A substitute Court Reporter served as the Official Court Reporter for the 27th Judicial District Court. Based upon the Court's review of the testimony, exhibits, and the underlying Order Establishing Paternity, the Court makes the following interim finding and ruling:

(1) The Court finds that there is a fatal flaw in Petitioner's pleadings. The Order he seeks to vacate is an Order Establishing Paternity, which was heard on April 27, 2016, and the Order signed by the Court on January 25, 2017. Petitioner was represented by an attorney at the hearing. The State of Texas became a party in the case on June 17, 2015, when the Child Support Division of the Texas Attorney General's Office intervened in the case. This Bill of Review does not include the State of Texas as a party, and they must have an opportunity to respond to Petitioner's request to vacate the Order Establishing Paternity.

(2) Thus, the Court cannot issue a final appealable ruling on Petitioner's Bill of Review at this time. Petitioner is ordered to file an amended pleading including the State of Texas as a party to his Bill of Review. The amended Petition must be efiled with the Lampasas County District Clerk on or before November 26, 2025, and Petitioner must promptly serve it on the Child Support Division of the Texas Attorney General's Office, who represents the State of Texas in this matter.

Signed this 28th day of October, 2025.

Judge Presiding

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 107392470
Filing Code Description: No Fee Documents
Filing Description: Memorandum Filing
Status as of 10/28/2025 3:45 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	10/28/2025 3:41:46 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	10/28/2025 3:41:46 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	10/28/2025 3:41:46 PM	SENT

Filed 10/30/2025 10:10 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, **Petitioner**, Pro Se,	§	
v.	§	27TH JUDICIAL DISTRICT
THENESHIA YVONNE GLAZE,	§	
AND ERIC L. GLAZE,	§	
AND THE STATE OF TEXAS ex rel. OFFICE OF THE ATTORNEY GENERAL, CHILD SUPPORT DIVISION, **Respondents.**	§	LAMPASAS COUNTY, TEXAS
	§	
	§	

SECOND AMENDED ORIGINAL PETITION FOR BILL OF REVIEW

TO THE HONORABLE JUDGE OF SAID COURT:
This petition is verified. See Unsworn Declaration.

COMES NOW, Richard K. Badu, Petitioner, appearing *pro se,* and respectfully files this *Second Amended Original Petition for Bill of Review* to set aside the *Order Establishing the Parent-Child Relationship* signed by this Court on **January 25, 2017**, following a hearing held on **April 27, 2016**, in Cause No. 19476.

This Second Amended Petition amends and supersedes all prior petitions previously filed in this cause.

This filing complies with Texas Rule of Civil Procedure 21c; the minor child is referred to herein only by the initials J.V.G. and by month and year of birth.

COMPLIANCE WITH COURT'S OCTOBER 28, 2025 MEMORANDUM RULING

Petitioner files this *Amended Verified Original Petition for Bill of Review* pursuant to the Court's Memorandum Ruling dated October 28, 2025, to join as an additional respondent the **State of Texas ex rel. Office of the Attorney General, Child Support Division** ("OAG"). The OAG was a nominal intervenor in the underlying 2016 SAPCR proceeding (Cause No. 19476) but was not named in the prior Bill of Review filings. This amendment cures that omission and ensures all necessary parties are properly before the Court.

In support thereof, Petitioner would show the Court as follows:

I. DISCOVERY LEVEL AND PARTIES

1. Discovery in this matter shall be conducted under Level 2 pursuant to Rule 190 of the Texas Rules of Civil Procedure.
2. Petitioner, **Richard K. Badu**, was the Respondent in the original Suit Affecting the Parent-Child Relationship ("SAPCR") under this Cause Number. The last three digits of Petitioner's driver's license are **540**, and the last three digits of his Social Security number are **937**. Petitioner's legal domicile is **Orlando, Florida**.
3. Respondent, **Theneshia Yvonne Glaze (also known as Theneshia Y. Culpepper-Glaze)**, is an individual and was the Petitioner in the original SAPCR. Her last known address is 1610 Stonebrooke Drive, Edwardsville, IL 62025.
4. **Eric L. Glaze, a presumed father of the child**, is a Proposed Necessary Party. The last known address for Eric Glaze from the Maryland divorce proceedings (**Case No. 08-C-14-000839**) was 11211 F Heron Lane, Waldorf, MD 20603. Petitioner, however, has recently discovered through diligent investigation that Eric Glaze's current address is believed to be 6438 Ocelot St, Waldorf, MD 20603.

II. JURISDICTION AND VENUE

5. This Court retains continuing, exclusive jurisdiction over the parent-child relationship under Texas Family Code §155.001 because it rendered the 2016 order.
6. A bill of review attacking the Texas judgment properly lies in this court. The Court has personal jurisdiction over Petitioner (by filing) and Respondent (as original SAPCR petitioner).
7. Venue is proper in Lampasas County pursuant to Texas Civil Practice and Remedies Code §15.002(a)(1).

III. LEGAL STANDARDS

8. This Bill of Review is governed by the equitable standards requiring proof of:
    a) a meritorious defense,
    b) that Petitioner was prevented from asserting it by the opposing party's fraud, and

c) that this was unmixed with Petitioner's own fault. See Caldwell v. Barnes, 975 S.W.2d 535 (Tex. 1998); King Ranch, Inc. v. Chapman, 118 S.W.3d 742, 751–52 (Tex. 2003) (distinguishing extrinsic from intrinsic fraud). In the Interest of Child v. H.C. (2022), the appellate court emphasized that a misstatement regarding parentage within a proceeding is intrinsic fraud, which does not support a Bill of Review because it could have been litigated initially. In contrast, **Petitioner's case involves extrinsic fraud**: **Respondent deliberately concealed her divorce and the presumed father's identity**, preventing any meaningful opportunity to defend. This structural misconduct justifies equitable relief under a Bill of Review.

IV. NATURE OF SUIT AND STATUTE OF LIMITATIONS

9. This is a direct, equitable action to set aside the April 27, 2016 "Order Establishing the Parent-Child Relationship" (of which Petitioner requests this Court take judicial notice).

10. Although more than four years have elapsed, Petitioner asserts that the four-year statute of limitations for this action, pursuant to Tex. Civ. Prac. & Rem. Code §16.051, has been equitably tolled by Respondent's extrinsic fraud. Petitioner pleads that this action was filed within a reasonable time after the discovery of said fraud.

11. This is not a paternity challenge under Tex. Fam. Code §160.607, but a direct equitable attack on the 2016 judgment based on extrinsic fraud. The limitations question is governed by equitable principles, and the residual four-year period is subject to tolling.

V. MERITORIOUS DEFENSE TO ORIGINAL ACTION

12. Petitioner has a meritorious defense to the finding that he is the father of the minor child, **J.V.G, born October 2014**.

13. On **April 4, 2014**, Respondent, **Theneshia Yvonne Glaze**, filed a Complaint for Absolute Divorce against **Eric L. Glaze** in the Circuit Court for Charles County, Maryland (**Case No. 08-C-14-000839**). The Maryland docket reflects that the divorce was finalized on **June 12, 2014**, and that the child in this case was born after the divorce was granted. Subsequent docket entries in 2018 show "Custody or Visitation Issues" being addressed in the same Maryland case. While the docket does not specify which child or children were the subject of the 2018 custody/visitation proceeding, it nonetheless demonstrates that **Eric**

L. Glaze remained active in Maryland family litigation after the Texas SAPCR was filed, confirming that he was a known and locatable party.

14. The **Judgment of Absolute Divorce** was entered on **June 12, 2014**. The **birth of the child in October 2014** occurred **120 days after the divorce judgment**, well within the **301-day statutory window under Tex. Fam. Code §160.204(a)(2)**, creating a **legal presumption that Eric L. Glaze is the child's father**.

15. The Maryland docket further shows that **Eric** L. **Glaze** was served with process, filed an Answer on **April 15, 2014**, and participated in the divorce proceeding. He was therefore a known, locatable, and **legally presumed father at the time the Texas SAPCR was filed**.

16. Under **Tex. Fam. Code §§160.603 and 160.604**, a presumed father is a necessary party to any proceeding to adjudicate the parentage of a child. **The Texas court was required to join Eric L. Glaze before issuing any order establishing another man's parentage.**

17. Because **Eric L. Glaze** was not joined, the April 27, 2016 order was rendered without jurisdiction over all necessary parties, resulting in a defective and voidable judgment.

18. This Court was not made aware of Eric Glaze's legal presumption of paternity and therefore proceeded in error. The Original Order was issued without joinder of a necessary party, rendering it defective.

VI. EXTRINSIC FRAUD AND DUE PROCESS VIOLATION

19. Petitioner was prevented from presenting this defense due to Respondent's extrinsic, collateral fraud.

20. In her **January 23, 2015 *First Amended Petition* in this SAPCR**, Respondent falsely swore: "The child, J.V.G, **has no presumed, acknowledged, or adjudicated father**."

21. This statement was materially false. At the time she filed this sworn pleading in Texas, Respondent:
a. Had recently obtained a divorce from **Eric L. Glaze** in Maryland;
b. Had addressed custody or visitation issues regarding the child in that Maryland proceeding; and
c. Knew that the child's birth date fell within the **301-day presumption period**, making ***Eric L. Glaze* the presumed father under Tex. Fam. Code §160.204(a)(2)**.

22. The Maryland court record confirms that Respondent knew the whereabouts of **Eric L. Glaze**, as he had been personally served, filed an Answer, and actively participated in the Maryland case.
23. Respondent's misrepresentation was outcome-determinative because it prevented the Texas court from applying the mandatory presumption of paternity and joinder provisions of Tex. Fam. Code Chapter 160. This omission corrupted the framework of the proceeding and denied Petitioner a fair opportunity to defend against the establishment of parentage.
24. The **fraud was extrinsic** in nature because it kept the Texas court from considering an indispensable party and deprived Petitioner of a meaningful opportunity to assert a complete defense. This structural defect is not cured by the passage of time and warrants equitable relief through this Bill of Review.

VII. NO FAULT OR NEGLIGENCE BY PETITIONER

25. Petitioner's failure to present his defense was unmixed with any fault or negligence. He had no verifiable knowledge of Respondent's prior marriage and relied entirely on her sworn statement. The Maryland record was not reasonably discoverable at the time due to out-of-state docket unfamiliarity, lack of identifying information to run targeted searches, and reliance on Respondent's sworn statements.
26. Petitioner exercised diligence but did not discover the fraud until August 5, 2025. While preparing for, and in the aftermath of, a July 23, 2025 hearing in a Florida child support proceeding (Case No. 48-2024-DR-009444-O), Petitioner conducted independent research that led to the discovery of previously concealed information.
27. Petitioner filed this Petition within a reasonable time after discovery.

VIII. DEPRIVATION OF FAIR OPPORTUNITY AND ONGOING HARM

28. As a direct result of Respondent's collateral misrepresentation, Petitioner was denied his day in court on the parentage framework and has been **prevented from establishing any relationship with the child**. **Petitioner has never met the child, who is now nearly 11 years old**. The same misrepresentation that corrupted the framework also produced ongoing deprivation. Equity should not allow a judgment rooted in a structural defect to stand where the petitioner acted promptly upon discovery.

IX. NO OTHER ADEQUATE LEGAL REMEDY

29. Petitioner had no opportunity to appeal or move for a new trial, as the fraud was not discovered in time.

X. PRAYER FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue citation to **Theneshia Yvonne Glaze** and **Eric Lemont Glaze**;
2. Set this matter for an evidentiary hearing;
3. Vacate the April 27, 2016 SAPCR order in Cause No. 19476;
4. Upon vacating the SAPCR, decline further jurisdiction under the **UCCJEA** and transfer the matter to Illinois as the more convenient forum under **Texas Family Code § 152.207** (Mother and Child are residence of Illinois of more than 10 years);
5. **In the alternative, if the Court retains jurisdiction:**
   a. Reopen the issue of parentage under **Texas Family Code Chapter 160** and join **Eric L. Glaze** as a party;
   b. Order genetic testing under **Texas Family Code § 160.502**; and
   c. Permit alternative service under **Rule 106** if necessary;
6. Order Respondent to pay attorney's fees, costs, and expenses as appropriate;
7. Issue an order prohibiting enforcement of the vacated Texas order in any other jurisdiction, including Florida (**Case No. 48-2024-DR-009444-O**); and
8. Grant such other and further relief to which Petitioner is justly entitled.

UNSWORN DECLARATION

My name is Richard K. Badu, my date of birth is July 14, 1980, and my address is 123 Aspire Dr., Kissimmee, FL 34747.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Orange County, Florida, on October 30, 2025.

EXHIBITS

- **Exhibit A:** True and correct printout from the Maryland Judiciary Case Search for **Case No. 08-C-14-000839** (Charles County Circuit Court), **Theneshia Y. Glaze v. Eric L. Glaze.**
  This docket is publicly accessible and can be independently verified by the Court at: https://casesearch.courts.state.md.us/casesearch/

(Search: Court System –> Circuit Court; County –> Charles; Case Number: **08C14000839**)

Respectfully submitted,
By: /s/ Richard K. Badu
Richard K. Badu, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this *Second Amended Original Petition for Bill of Review* was served on **October 30, 2025,** as follows:

– Via electronic service through eFileTexas and by certified mail, return receipt requested, to:

Office of the Attorney General – Child Support Division
Attn: Managing Attorney / Legal Docket
3011 Salisbury Drive
Temple, TX 76504-2273
Email: *CSD-legal-704@texasattorneygeneral.gov*

– Via electronic service to all other parties of record.

Respectfully submitted,
By: /s/ Richard K. Badu
Richard K. Badu, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

TLL/CPS 12-GP1541

IN THE INTEREST OF J. V. G., A CHILD

2/9/2015 DISTRICT CLERK
2:34pm
LAMPASAS COUNTY, TEXAS

DOCKET NO. 19476

Citation

RICHARD K BADU, 701 SOUTH HOWARD AVENUE, SUITE 106-424, TAMPA, FL 33606

You are hereby commanded to appear before the 27th JUDICIAL DISTRICT COURT of LAMPASAS County, Texas by filing a written answer to the petition of plaintiff at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof, a copy of which accompanies this citation, FIRST AMENDED PETITION IN SUIT AFFECTING PARENT-CHILD RELATIONSHIP AND TO ADJUDICATE PARENTAGE in cause numbered 19476, styled IN THE INTEREST OF J. V. G, A CHILD, THENESHIA YVONNE GLAZE, Plaintiff vs. RICHARD K BADU, Respondent filed in said court on the 23rd day of January, 2015.

The name and address of the attorney for plaintiff, or the address of plaintiff is:
THOMAS J. BAKER, 208 EAST CENTRAL AVENUE STE 106, BELTON, TX 76513

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 (20) days after you were served this citation and petition, a default judgment may be taken against you.

WITNESS, TERRI COX, Clerk of the 27th JUDICIAL DISTRICT COURT of LAMPASAS County, Texas.

Issued and give under my hand and seal this 23rd day of January, 2015.

TERRI COX, Clerk of the 27th JUDICIAL DISTRICT COURT of LAMPASAS County, Texas.
LAMPASAS COUNTY COURTHOUSE P.O. Box 327 LAMPASAS, TEXAS 76550

By _____ District Clerk
By Tricia Fabra Deputy

Officer/Authorized Person Return

Came to hand on the ____ day of _____, 20____, at _____ o'clock __.M. Executed at (address) _____ in the County of _____ Texas, at _____ o'clock __.M. on the ____ day of _____, 20_____ by delivering to _____, in person a true copy of this Citation together with the accompanying _____ copy(ies) of the _____ Petition attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this ____ day of _____, 20____.

FEE: $_____ Delivered by: _____

_____ County, Texas

By _____ Deputy

_____ Affiant

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

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. 19,476

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
J.V.G.	§	**27TH JUDICIAL DISTRICT**
	§	
A CHILD	§	**LAMPASAS COUNTY, TEXAS**

FIRST AMENDED PETITION IN SUIT AFFECTING PARENT-CHILD RELATIONSHIP AND TO ADJUDICATE PARENTAGE

1. *Discovery Level*

Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

2. *Petitioner*

This suit is brought by THENESHIA YVONNE GLAZE, Petitioner. Petitioner is the mother of the child.

The last three numbers of Petitioner's driver's license number are 812. The last three numbers of Petitioner's Social Security number are 724.

3. *Jurisdiction*

No court has continuing jurisdiction of this suit or of the child the subject of this suit.

4. *Required Information about Child*

Information required by section 154.181(b) of the Texas Family Code is provided in the statement attached as Exhibit A.

FILED
a.m. 3:2 p.m. o'clock
JAN 23 2015
TERRI COX
District Court, Lampasas County, TX
Deputy

5. *Child*

The following child is the subject of this suit:

Name: JORDAN VONNE GLAZE
Sex: Female
Birth date: October 10, 2014
County of residence: Lampasas
Home State: Texas

The child, JORDAN VONNE GLAZE, has no presumed, acknowledged, or adjudicated father.

6. *Persons Entitled to Citation*

The alleged father of the child, JORDAN VONNE GLAZE, the subject of this suit is

RICHARD K. BADU.

Process should be served at 701 South Howard Avenue, Suite 106-424, Tampa, Florida 33606.

There are no court-ordered conservatorships, court-ordered guardianships, or other court-ordered relationships affecting the child the subject of this suit.

7. *Nonresident Entitled to Citation*

RICHARD K. BADU, named above, is a nonresident of Texas.

The nonresident person has traveled to and in Texas in February 2014 before the filing of this suit.

The child the subject of this suit resides in Texas as a result of the acts or directives of the nonresident person.

8. *Property*

No property of consequence is owned or possessed by the child the subject of this suit.

9. *Purpose of Suit*

The purpose of this suit is to establish the parent-child relationship between RICHARD K. BADU and the child the subject of this suit.

10. *Conservatorship*

The best interest of the child the subject of this suit will be served by the appointment of THENESHIA YVONNE GLAZE as joint managing conservator with the exclusive right to designate the primary residence of the child, and Petitioner so requests. Petitioner further requests that appropriate orders be made for access to the child and the allocation of the rights and duties of the conservators.

11. *Support*

Petitioner requests that appropriate orders be made for support of the child, including retroactive child support.

Petitioner requests that RICHARD K. BADU be ordered to pay an equitable portion of all prenatal and postnatal health-care expenses of the mother and the child, JORDAN VONNE GLAZE.

12. *Attorney's Fees, Expenses, Costs, and Interest*

It was necessary for Petitioner to secure the services of Thomas J. Baker, a licensed attorney, to prepare and prosecute this suit. Judgment for reasonable attorney's fees, expenses,

and costs through trial and appeal should be granted against RICHARD K. BADU and in favor of Petitioner for the use and benefit of Petitioner's attorneys and be ordered paid directly to Petitioner's attorney, who may enforce the judgment in the attorney's own name. Petitioner requests postjudgment interest as allowed by law.

13. Genetic Testing

Petitioner requests that genetic testing be ordered in accordance with chapter 160 of the Texas Family Code as soon as all necessary parties are before the Court. Petitioner requests that the arrangements prescribed by the Court for genetic testing include provisions for making blood, buccal cells, bone, hair, or other body tissue or fluid samples available to Petitioner's expert, who is qualified in genetic testing and who is employed by Petitioner.

14. Temporary Orders

Petitioner requests the Court on notice and hearing to render a temporary order for child support if the alleged father is shown by clear and convincing evidence to be the father.

Petitioner requests the Court on notice and hearing to render a temporary order appointing THENESHIA YVONNE GLAZE as joint managing conservator with the exclusive right to designate the primary residence of the child. Petitioner further requests that appropriate temporary orders be made for access to the child and the allocation of the rights and duties of the conservators.

Petitioner requests the Court, after notice and hearing, to make temporary orders for the safety and welfare of the child, including but not limited to the following:

Enjoining RICHARD K. BADU from removing the child beyond a geographical area identified by the Court, acting directly or in concert with others.

Ordering RICHARD K. BADU to produce copies of income tax returns for tax years 2012 and 2013, a financial statement, and current pay stubs by a date certain.

15. Request for Temporary Restraining Order

The Lampasas and Bell counties' Standing Order is attached hereto and is incorporated herein by reference as if set forth in full.

16. Request for Temporary Orders and Injunction

Petitioner requests the Court to dispense with the necessity of a bond, and Petitioner requests that, after notice and hearing, RICHARD K. BADU be further restrained and enjoined, pending the further order of this Court, from:

Disturbing the child or Petitioner or interfering in any way with Petitioner's possession of the child by taking or attempting to take possession of the child, directly or through any other person, from the residence, school, or any other place.

Withdrawing the child from enrollment in the school or day-care facility where the child is presently enrolled.

Hiding or secreting the child from Petitioner.

Making disparaging remarks regarding Petitioner or Petitioner's family in the presence or within the hearing of the child.

Consuming alcohol within the 24 hours before or during the period of possession of or access to the child.

17. Prayer

Petitioner prays that citation and notice issue as required by law.

Petitioner prays for an order adjudicating parentage, that THENESHIA YVONNE GLAZE be appointed joint managing conservator with the exclusive right to designate the primary residence of the child, that appropriate orders be made for the support of the child and for payment of an equitable portion of all prenatal and postnatal health-care expenses of the mother and child, and payment of the fees, expenses, and costs of Petitioner in bringing this action.

Petitioner prays for attorney's fees, expenses, costs, and interest as requested above.

Petitioner prays for general relief.

THOMAS J. BAKER
100 West Central Texas Expressway, Suite 303
Harker Heights, Texas 76548
Tel: (254) 634-8600
Fax: (254) 554-6686

By: Thomas J Baker
Thomas J. Baker
State Bar No. 01595700
thomasjbaker_atty@hotmail.com
Attorney for Petitioner

LAMPASAS COUNTY STANDING ORDER REGARDING CHILDREN, PROPERTY, AND CONDUCT OF THE PARTIES

THE LAMPASAS COUNTY DISTRICT COURT STANDING ORDER REGARDING CHILDREN, PROPERTY, AND CONDUCT OF THE PARTIES IS BINDING ON (1) THE PARTIES, (2) THE PARTIES' OFFICERS, AGENTS, SERVANTS, EMPLOYEES, AND ATTORNEYS, AND (3) ANY OTHER PERSON WHO ACTS IN CONCERT WITH THE PARTIES OR THEIR AGENTS AND WHO RECEIVES ACTUAL NOTICE OF THESE ORDERS, AND IS ENFORCEABLE BY CONTEMPT OF COURT, INCLUDING FINE AND/OR IMPRISONMENT.

No party in this lawsuit has requested this order. Rather, this order is a standing order of the Lampasas County District Court that applies in every divorce suit and every suit affecting the parent-child relationship filed in Lampasas County, Texas. The Lampasas County District Court has adopted this order because the parties and their children should be protected and their property preserved while the lawsuit is pending before the Court. The term "party" as used in this order does not include the Attorney General of Texas, or the Lampasas County District and County Attorney.

IT IS THEREFORE ORDERED:

1. **NO DISRUPTION OF CHILDREN.** All parties are ORDERED to refrain from doing the following acts concerning the children who are subjects of this cause:

   1.1 Removing the children from the State of Texas for the purpose of changing the children's domicile or residence, acting directly or in concert with others, without the written agreement of all parties or an Order of this Court; provided, however, that this paragraph shall not prohibit or restrict a party from removing the children if an active prior court order gives that party the right to designate the children's primary residence outside the State of Texas or without regard to geographic location.

   1.2 Disrupting or withdrawing the children from the school or day-care facility where the children are presently enrolled without the written agreement of all parties or an Order of this Court; provided, however that this paragraph shall not prohibit or restrict a party from so withdrawing the children from a school or day-care facility if that party is changing the children's domicile or residence within that party's rights pursuant to an active prior court order as described in Section 1.1 above.

   1.3 Hiding or secreting the children from the other party.

   1.4 Changing the children's current place of abode without the written agreement of all parties or an Order of this Court; provided, however, that this paragraph shall not prohibit or restrict a party from changing such place of abode if an active prior order gives that party the right to designate the children's primary residence without geographic restriction,

or if the new place of abode lies within the geographic limits established by that active prior court order.

1.5 Disturbing the peace of the children.

1.6 Making disparaging remarks about another party or another party's family members, including but not limited to the child's grandparents, aunts, uncles, stepparents, or anyone with whom the other party has a dating relationship.

1.7 Discussing with the children, or with any other person in the presence of the children, any litigation related to the children or the other party.

1.8 If this is an original divorce action, allowing anyone with whom the party has a dating relationship to be in the same dwelling or on the same premises overnight while in possession of the child. Overnight is defined from 10:00 p.m. until 7:00 a.m.

2. **CONDUCT OF THE PARTIES DURING THE CASE.** All parties are ORDERED to refrain from doing the following acts with the intent to harass, annoy, alarm, abuse, torment, or embarrass another party:

2.1 Using vulgar, profane, obscene, coarse, offensive or indecent language to communicate with another party, whether in person, by telephone, or in writing, including by email, text message, or any other electronic communication.

2.2 Threatening another party in person, by telephone, or in writing, including by email, text message, or any other electronic communication, to take unlawful action against the party, or member of the party's family, including but not limited to anyone with whom the party has a dating relationship, or the party's property.

2.3 Placing or transmitting one or more telephone calls, emails, text messages, or other electronic communications to another party at an unreasonable hour, in an offensive or repetitious manner, anonymously, or without legitimate purpose of communication.

3. **PRESERVATION OF PROPERTY AND USE OF FUNDS DURING DIVORCE CASE.** If this is a divorce case, both parties to the marriage are ORDERED to refrain from the following conduct:

3.1 Destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of one or both of the parties, regardless of whether it is personal or real property and whether it is claimed as separate or community property.

3.2 Misrepresenting or refusing to disclose to the other party or to the Court, on proper request, the existence, amount, or location of any property of one or both of the parties, regardless of whether it is personal or real property and whether it is claimed as separate or community property.

3.3 Damaging, destroying or tampering with the tangible property of one or both of the parties, including any document that represents or embodies

anything of value, regardless of whether it is personal or real property and whether it is claimed as separate or community property.

3.4 Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of either party, regardless of whether it is personal or real property and whether it is claimed as separate or community property, except as specifically authorized by this Order or a subsequent Order of this Court.

3.5 Incurring any indebtedness, including cash advances from a credit card or line of credit, other than legal expense in connection with this suit, except as specifically authorized by this Order or a subsequent order of this Court.

3.6 Making withdrawals or transfers from any account in any financial institution for any purpose, except as specifically authorized by this Order or a subsequent Order of this Court.

3.7 Spending any sum of cash in either party's possession or subject to either party's control for any purpose, except as specifically authorized by this Order or a subsequent Order of this Court.

3.8 Withdrawing or borrowing in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan or employee savings plan or from any individual retirement account or Keogh account, except as specifically authorized by this Order or a subsequent Order of this Court.

3.9 Signing or endorsing the other party's name on any negotiable instrument, check, or draft, such as tax refunds, insurance payments, and dividends, or attempting to negotiate any negotiable instrument payable to the other party without the personal signature of the other party.

3.10 Taking any action to terminate, close, restrict, or limit lines of credit, credit cards, charge cards, or financial accounts in the name of or subject to the control of the other party, whether owned individually or jointly, except by subsequent Order or written agreement signed by each party permitting such action.

3.11 Entering, operating, or exercising control over the motor vehicle in the possession of the other party.

3.12 Discontinuing or altering the withholding for federal income taxes on wages or salary while this suit is pending.

3.13 Terminating or in any manner affecting the service of water, electricity, gas, telephone, cable television, or other contractual services, such as security, pest control, landscaping, or yard maintenance at the other party's residence or in any manner attempting to withdraw any deposits for service in connection with such services.

3.14 Unlawfully intercepting or recording the other party's electronic communications.

3.15 Opening, diverting, or disposing of mail addressed to the other party.

3.16 Excluding a spouse from the use and enjoyment of the marital residence in which the spouse had been residing within the thirty (30) day period prior to the date the original petition for divorce was filed.

3.17 Communicating with the other party's employer or a person with whom the other party has a business relationship without a legitimate purpose.

3.18 Entering any safe deposit box in the name of or subject to the control of a party, whether owned individually or jointly, except by subsequent Court Order or written agreement signed by each party permitting such entrance.

4. **PERSONAL AND BUSINESS RECORDS IN DIVORCE CASE.** If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts:

4.1 Concealing or destroying any family records, property records, financial records, business records or any records of income, debts, or other obligations.

4.2 Falsifying any writing or record relating to the property of either party.

4.3 "Records" includes e-mail or other digital or electronic data, whether stored on a computer hard drive, diskette or other electronic storage device.

5. **INSURANCE IN DIVORCE CASE.** If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts, except by written agreement signed by each party permitting such acts:

5.1 Withdrawing or borrowing in any manner all or any part of the cash surrender value of life insurance policies on the life of either party, except as specifically authorized by this Order or a subsequent Order of this Court.

5.2 Changing or in any manner altering the beneficiary designation on any life insurance on the life of either party or the parties' children.

5.3 Canceling, altering, or in any manner affecting any casualty, automobile, or health insurance policies insuring the parties' property or persons including the parties' minor children.

6. **SPECIFIC AUTHORIZATION IN DIVORCE CASE.** If this is a Divorce Case, both parties to the marriage are specifically authorized to do the following:

6.1 To engage in acts reasonable and necessary to the conduct of that party's usual business and occupation.

6.2 To make expenditures and incur indebtedness for reasonable attorney's fees and expenses in connection with this suit.

6.3 To make expenditures and incur indebtedness for reasonable and necessary living expenses.

6.4 To make withdrawals from accounts in financial institutions only for the purposes authorized by this order.

7. **SERVICE AND APPLICATION OF THIS ORDER.**

7.1 The Petitioner shall attach a copy of this Order to the original petition and to each copy of the petition. At the time the petition is filed, if the Petitioner has failed to attach a copy of this Order to the petition and any copy of the petition, the Clerk shall ensure that a copy of this Order is attached to the petition and every copy of the petition presented.

7.2 This Order is effective upon the filing of the original petition and shall remain in full force and effect as a Temporary Restraining Order for fourteen days after the date of the filing of the original petition. If, after service, no party contests this Order by presenting evidence at a hearing on or before fourteen days after the date of service of the original petition, this Order shall continue in full force and effect as a Temporary Injunction until further Order of this Court. This entire Order will terminate and will no longer be effective only upon further Order of the Court, entry of a Final Order or dismissal of the case.

7.3 In addition to any other remedies available for the enforcement of this Order, at the Court's discretion, the Court may award reasonable and necessary attorney fees against a party found to have violated a provision of this order.

8. **EFFECT OF OTHER COURT ORDERS.** If any part of this Order conflicts with any part of a Protective Order that has already been entered or is later entered, the Protective Order provisions prevail. Any part of this Order not changed by some later Order remains in full force and effect until the Court signs a Final Decree, other Final Order, or a Dismissal Order.

9. **PARTIES ENCOURAGED TO MEDIATE/COLLABORATE.** The parties are encouraged to settle their disputes amicably without Court intervention. The parties are encouraged to use alternative dispute resolution methods, such as mediation or the collaborative law process, to resolve the conflicts that may arise in this lawsuit.

10. **PARENT EDUCATION AND STABILIZATION.** Parents of minor children are ORDERED to attend a parent education and stabilization program or an approved parenting class within sixty (60) days of the filing date of the Petition for Divorce and/or Suit Affecting the Parent Child Relationship, unless waived by the Court.

11. **APPLICATION FOR EX PARTE ORDERS**

By presenting any application for an ex parte order, counsel is deemed to represent to the Court that:

a. to the best of counsel's knowledge, the party against whom the relief is sought is not represented by counsel; or

b. if the party against whom the relief is sought is represented by counsel, that (i) such counsel has been notified of the application and does not wish

to be heard by the Court thereon; or (ii) counsel presenting the application has diligently attempted to notify opposing counsel, has been unable to do so, and the circumstances do not permit additional efforts to give such notice.

12. **TIME LIMITS IN TEMPORARY HEARINGS.** In all matters in which temporary managing conservatorship is in issue, the parties shall be granted not more than two (2) hours to present the case, which time shall be equally divided. In all other temporary matters, including a modification of a temporary order, the parties shall be granted not more than one (1) hour to present the case, which time shall be equally divided. Counsel should request a special setting at the time the application for temporary relief is presented to the Court for scheduling when, because of unusual circumstances, the time limits are unworkable or inappropriate. The Court shall then determine the amount of time that shall be allotted for the hearing.

13. **DOCUMENTS REQUIRED IN TEMPORARY HEARINGS.** In all cases in which temporary support of a spouse and/or the child is in issue, each party shall be required to furnish:

13.1 A statement of monthly income and expenses in a form substantially similar to the form found in the current Texas Family Law Practice manual published by the State Bar of Texas or in a form approved by this Court.

13.2 Copies of that party's federal income tax returns for the two calendar years prior to the temporary hearing.

13.3 All payroll statements, pay stubs, W2 forms, and 1099 forms which evidence that party's earnings for the calendar year prior to the temporary hearing and from January 1 of the current year through the date of the temporary hearing.

14. **PROPOSED PROPERTY DIVISION FORM REQUIRED**

14.1 In all cases in which the character, value or division of property or debts is in issue, each party shall file, not less that ten (10) days prior to trial, a proposed property division form including all of the separate and community property owned or claimed by the parties and all debts and liabilities owed by the parties. It is recommended that each party file this proposed property division form in a form substantially similar to the form found in the current Texas Family Law Practice manual published by the State Bar of Texas or in a form approved by the Court.

14.2 If a party or the parties fail to prepare and/or file the proposed property division form as required, the Court may conduct a pretrial hearing and make such orders with regard to the failure as are just, including but not limited to, sanctions pursuant to Rule 215(2)(b) of the Texas Rules of Civil Procedure, as amended.

THIS LAMPASAS COUNTY DISTRICT COURT STANDING ORDER REGARDING CHILDREN, PROPERTY, AND CONDUCT OF THE PARTIES IS EFFECTIVE IN ALL DIVORCE SUITS AND SUITS AFFECTING THE PARENT-CHILD RELATIONSHIP FILED ON OR AFTER OCTOBER 15, 2013.

JUDGE JOHN GAUNTT
27th DISTRICT COURT

NOTICE TO SHOW CAUSE

CLERK OF THE COURT

Terri Cox
P.O. Box 327
Lampasas Texas 76550

ATTORNEY FOR PLAINTIFF OR PLAINTIFF

Thomas J Baker
100 West Central Texas Expressway, Suite 303
Harker Heights, Texas 76548

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 notice by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this notice and petition, a default judgment will be taken against you."

THE STATE OF TEXAS

TO RICHARD K BADU
701 SOUTH HOWARD AVENUE, SUITE 106-424
TAMPA, FL 33606

GREETING:

WHEREAS, THENESHIA YVONNE GLAZE , of the County of Lampasas, State of Texas, did on the 23rd day of January, 2015 file in the District Court of Lampasas ORDER SETTING HEARING Suit No. 19476 on the Civil Docket of said Court, wherein IN THE INTEREST OF JORDAN VONNE GLAZE, Plaintiff, and RICHARD K BADU, Defendant and alleges as follows:

SEE ATTACHED:

AND WHEREAS, the Honorable John Grimm, Judge of said Court, has entered the following order, to-wit:

SEE ATTACHED

AND WHEREAS, the said NOTICE OF HEARING FOR TEMPORARY ORDERS will be heard by the said Court, at Lampasas Texas, **on the 20th day of February, 2015, at 09:00:00 o'clock a.m.**

THESE ARE, THEREFORE, to require you to appear at the time and place as above stated, and answer said Show Cause, showing cause, if any you can, why same should not be granted.

Given under my hand and seal of said Court, at office in Lampasas, Texas, this the 23rd day of January, 2015.

Lampasas District Clerk

27th District Court, Lampasas County, Texas.

By _____ District Clerk.

By Shawn Fitt Deputy.

COPY

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. 19476

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
J.V.G.	§	**27TH JUDICIAL DISTRICT**
	§	
A CHILD	§	**LAMPASAS COUNTY, TEXAS**

MOTION FOR TEMPORARY ORDERS

This motion is brought by THENESHIA YVONNE GLAZE, Petitioner, who shows in support:

1. THENESHIA YVONNE GLAZE requests that the Court set a hearing and issue appropriate orders for genetic testing, including the assessment of costs and additionally:

2. Temporary orders for support, conservatorship, and access should be rendered pending final hearing in this case.

3. RICHARD K. BADU should be ordered to pay child support to THENESHIA YVONNE GLAZE for the benefit of the child.

4. Child support should be paid to Petitioner by RICHARD K. BADU, the alleged father, who has been identified as the father through genetic testing.

5. THENESHIA YVONNE GLAZE requests that the Court set a hearing and issue appropriate orders for the safety and welfare of the child, including but not limited to-

a. Naming THENESHIA YVONNE GLAZE Temporary Primary Joint Managing Conservator with the exclusive right to designate the primary residence of the child.

b. Naming RICHARD K. BADU Temporary Secondary Joint Managing Conservator of the child.

c. Ordering RICHARD K. BADU to pay child support to THENESHIA YVONNE GLAZE for the use and benefit of the child.

d. Awarding RICHARD K. BADU periods of access to and possession of the child.

e. Ordering that, after notice and hearing, RICHARD K. BADU be restrained and enjoined, pending the further order of this Court, from:

Disturbing the child or the other party or interfering in any way with the

other party's possession of the child by taking or attempting to take possession of the child, directly or through any other person, from the residence, school, or any other place.

Withdrawing the child from enrollment in the school or day-care facility where the child is presently enrolled.

Hiding or secreting the child from the other party.

Making disparaging remarks regarding Petitioner or Petitioner's family in the presence or within the hearing of the child.

Consuming alcohol within the 24 hours before or during the period of possession of or access to the child.

f. Ordering RICHARD K. BADU to pay reasonable attorney's fees and expenses.

6. THENESHIA YVONNE GLAZE prays that the Court set a hearing and grant the requested relief.

THENESHIA YVONNE GLAZE prays for attorney's fees.

THENESHIA YVONNE GLAZE prays for general relief.

FILED
3:10 a.m. p.m. o'clock
DEC 22 2014
By [illegible] Clerk
District Court, Lampasas County, Tx

THOMAS J. BAKER
100 West Central Texas Expressway, Suite 303
Harker Heights, Texas 76548
Tel: (254) 634-8600
Fax: (254) 554-6686

By: Thomas J Baker
Thomas J. Baker
State Bar No. 01595700
thomasjbaker_atty@hotmail.com
Attorney for THENESHIA YVONNE GLAZE

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on December ____, 2014.

Thomas J Baker
Thomas J. Baker
Attorney for THENESHIA YVONNE GLAZE

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. 19476

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
J.V.G.	§	**27TH JUDICIAL DISTRICT**
	§	
A CHILD	§	**LAMPASAS COUNTY, TEXAS**

ORDER SETTING HEARING

On 01-23-2015 the Court considered the Motion for Temporary Orders filed by THENESHIA YVONNE GLAZE, Petitioner.

IT IS ORDERED that a hearing is set on 2-20-2015 at 9:00 A.M. The purpose of the hearing is to determine whether, while this case is pending,

a. THENESHIA YVONNE GLAZE should be named Temporary Primary Joint Managing Conservator with the exclusive right to designate the primary residence of the child.

b. RICHARD K. BADU should be named Temporary Secondary Joint Managing Conservator of the child.

c. RICHARD K. BADU should be ordered to pay child support to THENESHIA YVONNE GLAZE for the use and benefit of the child.

d. RICHARD K. BADU should be awarded periods of access to and possession of the child.

e. RICHARD K. BADU should be restrained and enjoined, pending the further order of this Court, from:

Disturbing the child or the other party or interfering in any way with the other party's possession of the child by taking or attempting to take possession of the child, directly or through any other person, from the residence, school, or any other place.

Withdrawing the child from enrollment in the school or day-care facility where the child is presently enrolled.

Hiding or secreting the child from the other party.

Making disparaging remarks regarding Petitioner or Petitioner's family in the presence or within the hearing of the child.

3

Consuming alcohol within the 24 hours before or during the period of possession of or access to the child.

f. RICHARD K. BADU should be ordered to pay reasonable attorney's fees and expenses.

SIGNED on JAN 23 2015 at 3:40 P.M.

/s/ John Gauntt
JUDGE PRESIDING

FILED
a.m. 3:50 p.m. o'clock

JAN 23 2015

TERRI COX
District Court, Lampasas County, TX
By Deputy

AFFIDAVIT OF SERVICE

State of Texas **County of Lampasa** **District Clerk Court**

Case Number: 19476

Plaintiff:
IN THE INTEREST OF JORDAN VONNE GLAZE, A CHILD
vs.
Defendant:
RICHARD K. BADU

For:
Thomas J. Baker
100 West Central Texas Expressway
Suite 303
Harker Heights, TX 76548

Received by Tevitt Givens on the 9th day of February, 2015 at 10:13 am to be served on **Richard K. Badu, 701 South Howard Avenue, Suite 106-424, Tampa, FL 33606.**

I, Tevitt Givens, being duly sworn, depose and say that on the **9th day of February, 2015** at **11:25 am**, I:

SUBSTITUTE served by delivering a true copy of the **Citation, First Amended Petition in Suit Affecting Parent-Child Relationship and To Adjudicate Parentage, Lampasa County Standing Order Regarding Children, Property, and Conduct Of The Parties, Notice To Show Cause, Motion For Temporary Orders, and Order Setting Hearing** to: **Kaylin Miglin**, a person in charge at the recipient's **PRIVATE MAILBOX** location at the address of: **701 South Howard Avenue, Ste 106-424, Tampa, FL 33606**; the only address known after reasonable investigation and after determining that the person or business to be served maintains a mailbox at this location, in compliance with State Statutes.

Additional Information pertaining to this Service:
2/9/2015 11:25 am Server observed the listed address is a UPS Store. Server spoke to a 23 year old, Caucasian woman, 5'3" tall, 120 lbs, brown hair, and glasses named Kaylin Miglin. Kaylin identified herself as a UPS Store Associate who then subsequently verified that box# 424 belongs to Richard K. Badu. Kaylin was then subsequently served.

Description of Person Served: Age: 23, Sex: F, Race/Skin Color: Caucasian, Height: 5'3", Weight: 120, Hair: Brown, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 17 day of February, 2015 by the affiant who is personally known to me.

NOTARY PUBLIC

JORDAN CUNNINGHAM
Notary Public - State of Florida
My Comm. Expires Jun 10, 2017
Commission # FF 26972

Tevitt Givens
CPS# 12-681841

Alliance Process Services, LLC
4726 West Bradley Street
Tampa, FL 33616
(813) 856-8906

Our Job Serial Number: TIV-2015000016

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AFFIDAVIT OF SERVICE

State of Texas **County of Lampasa** **District Clerk Court**

Case Number: 19476

Plaintiff:
IN THE INTEREST OF JORDAN VONNE GLAZE, A CHILD

vs.

Defendant:
RICHARD K. BADU

For:
Thomas J. Baker
100 West Central Texas Expressway
Suite 303
Harker Heights, TX 76548

Received by Tevitt Givens on the 9th day of February, 2015 at 10:13 am to be served on **Richard K. Badu, 701 South Howard Avenue, Suite 106-424, Tampa, FL 33606.**

I, Tevitt Givens, being duly sworn, depose and say that on the **9th day of February, 2015** at **11:25 am**, I:

SUBSTITUTE served by delivering a true copy of the **Citation, First Amended Petition In Suit Affecting Parent-Child Relationship and To Adjudicate Parentage, Lampasa County Standing Order Regarding Children, Property, and Conduct Of The Parties, Notice To Show Cause, Motion For Temporary Orders, and Order Setting Hearing** to: **Kaylin Miglin**, a person in charge at the recipient's **PRIVATE MAILBOX** location at the address of: **701 South Howard Avenue, Ste 106-424, Tampa, FL 33606**; the only address known after reasonable investigation and after determining that the person or business to be served maintains a mailbox at this location, in compliance with State Statutes.

Additional Information pertaining to this Service:
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Description of Person Served: Age: 23, Sex: F, Race/Skin Color: Caucasian, Height: 5'3", Weight: 120, Hair: Brown, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 17 day of February, 2015 by the affiant who is personally known to me.

NOTARY PUBLIC

JORDAN CUNNINGHAM
Notary Public - State of Florida
My Comm. Expires Jun 19, 2017
Commission # FF 25672

Tevitt Givens
CPS# 12-661841

Alliance Process Services, LLC
4728 West Bradley Street
Tampa, FL 33616
(813) 856-5906

Our Job Serial Number: TIV-2015000016

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Envelope ID: 107469968
Filing Code Description: Amended Filing
Filing Description: Second Amended Original Petition for Bill of Review (Compliance with Court???s Oct. 28, 2025 Memorandum Ruling)
Status as of 10/30/2025 10:46 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	10/30/2025 10:10:18 AM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	10/30/2025 10:10:18 AM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	10/30/2025 10:10:18 AM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	10/30/2025 10:10:18 AM	SENT

EXHIBIT A – Order for Parentage Testing

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
NCP Name: *RICHARD K BADU*
CP Name: *THENESHIA YVONNE GLAZE*
OAG Number: **0013138237**

CAUSE NUMBER *19,476*

IN THE INTEREST OF	§	IN THE *27TH JUDICIAL DISTRICT COURT*
JORDAN VONNE GLAZE	§	OF
A CHILD	§	*LAMPASAS* COUNTY, TEXAS

ORDER FOR PARENTAGE TESTING

It is FOUND that the taking of blood, body fluid or tissue samples for scientifically accepted parentage testing and examination by experts is required in the above numbered and entitled cause pursuant to Texas Family Code Chapter 160.

RICHARD K BADU is ORDERED to bring a photo identification (e.g. a drivers license) and report as directed by the Office of the Attorney General to provide samples of blood, body fluid or tissue as required for parentage testing.

THENESHIA YVONNE GLAZE is ORDERED to bring a photo identification (e.g. a drivers license) and report with the following child:

Name	Sex	Date of Birth
JORDAN VONNE GLAZE	F	10/10/2014

as directed by the Office of the Attorney General to provide samples of blood, body fluid or tissue as required for parentage testing.

DNA Diagnostics Center, by its agents, is APPOINTED as the expert to perform parentage testing and it is ORDERED that said expert is to identify the aforementioned persons; to take photographs of the aforementioned persons; and to obtain a sample of blood, body fluids or tissue from each sufficient for parentage testing in accordance with this order. Said expert shall conduct such testing as is necessary to ascertain the possibility of the alleged father's paternity and to exclude at least 99% of the male population from the possibility of being the father of the said child. The aforementioned persons are ORDERED to report and provide an additional sample of blood, body fluid or tissue if the expert deems additional samples necessary.

Upon completion of the parentage tests, *DNA Diagnostics Center* shall promptly report the results of the tests, and its findings, conclusions, and opinions concerning whether *RICHARD K BADU* is the biological father of the child to the *Attorney General, 3011 SAULSBURY DRIVE, TEMPLE, TX, 76504-2273*. The costs and expenses of the testing, including the costs of any report, depositions or trial appearance by said expert shall be advanced by the Attorney

General. Such costs and expenses shall be taxed as costs in this proceeding, and adjudged as appropriate on final hearing.

If any party is incarcerated in a criminal correction facility at the time he is to provide samples of blood, body fluid or tissue as required for parentage testing, it is ORDERED that samples to be taken from the incarcerated party by the court-appointed expert shall be obtained in the correction facility. Further it is ORDERED that the correction agency shall allow access to the incarcerated party by the court appointed expert and shall allow the court-appointed expert to photograph the incarcerated party.

ORDER SETTING HEARING

The parties are ORDERED to appear before this Court, *LAMPASAS CNTY OFFICE BLDG, 409 S PECAN, LAMPASAS, TX 76550*, in person or by counsel, at **9:00 o'clock a.m., on the 25th day of August, 2015**, for hearing on the merits.

The Court notifies all parties that refusal to submit to testing as ordered above may result in the adjudication of paternity by the Court at the above-scheduled hearing, and/or a finding of contempt, pursuant to the Texas Family Code §160.622.

Signed this _____ day of _____, 20_____.

_____
JUDGE PRESIDING

Cause Number 19,476; LAMPASAS County, Texas

Phillip F. Arrien SBN: 01357500
Dawn Baardsen SBN: 24045430
Kara Bojko SBN: 24089994
Leslie Capace SBN: 24080621
John G. Jenkins SBN: 24074485
Shinia Lambert SBN: 24060127
Attorney of Record
Child Support Division
3011 SAULSBURY DRIVE
TEMPLE, TX 76504-2273
Email CSD-legal-704@texasattorneygeneral.gov
Telephone No. (254)778-1841
Toll Free 1(800)252-8014
FAX No. (254)771-2791

_____
THENESHIA YVONNE GLAZE, Obligee

_____
RICHARD K BADU, Obligor

_____
THOMAS J BAKER - SBN: 01595700
Attorney for Obligee

_____
BRYON BARNHILL - SBN: 00795017
Attorney for Obligor

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Envelope ID: 110466389
Filing Code Description: Motion (No Fee)
Filing Description: Petitioner???s Motion to Correct, Modify, or Clarify Memorandum Ruling Signed January 22, 2026 (Or, in the Alternative, Motion for New Trial)
Status as of 1/28/2026 4:41 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	1/26/2026 1:38:54 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	1/26/2026 1:38:54 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	1/26/2026 1:38:54 PM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	1/26/2026 1:38:54 PM	SENT

Filed 12/30/2025 4:32 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Becky Whitt

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	
v.	§	27TH JUDICIAL DISTRICT
THENESHIA YVONNE GLAZE,	§	
AND	§	
ERIC L. GLAZE,	§	
AND	§	LAMPASAS COUNTY, TEXAS
THE STATE OF TEXAS ex rel. OFFICE OF THE ATTORNEY GENERAL, CHILD SUPPORT DIVISION, **Respondents.**		

PETITIONER'S STATEMENT TO STAND ON EXISTING TESTIMONY AND ARGUMENT

COMES NOW **Petitioner, Richard Badu**, and respectfully files this Statement pursuant to the Court's instruction, and states as follows:

1. Petitioner agrees to stand on the testimony, evidence, and oral argument previously presented to the Court in connection with the Second Amended Original Bill of Review.
2. Petitioner does not request the presentation of additional testimony, evidence, or oral argument.
3. Petitioner respectfully requests that the Court consider the matter submitted on the existing record and issue its ruling without the need for a further hearing.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully prays that the Court proceed to rule on the Second Amended Original Bill of Review based on the existing record.

Respectfully submitted,

By: /s/ Richard K. Badu

Richard K. Badu, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 109549092
Filing Code Description: Request
Filing Description: Petitioner???s Statement to Stand on Existing Testimony and Argument
Status as of 12/31/2025 10:05 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	12/30/2025 4:32:02 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	12/30/2025 4:32:02 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	12/30/2025 4:32:02 PM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	12/30/2025 4:32:02 PM	SENT

Filed 1/23/2026 8:14 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NUMBER 25DC23996

RICHARD K. BADU	**IN THE DISTRICT COURT**
VS.	**27TH JUDICIAL DISTRICT**
THENESHIA YVONNE GLAZE	**LAMPASAS COUNTY, TEXAS**

MEMORANDUM RULING

This case came before the Court on October 2, 2025. Petitioner, Richard K. Badu, appeared in person as a self-represented litigant. Respondent, Theneshia Yvonne Glaze, appeared in person as a self-represented litigant. A substitute Court Reporter served as the Official Court Reporter for the 27th Judicial District Court. Following the October 2, 2025 hearing, the Child Support Division of the Attorney General's Office was added as a necessary party and given notice of the pending Bill of Review. The Attorney General's Office did not file an Answer or make an appearance. Due to the long distances traveled and the associated costs for both self-represented litigants to appear at the hearing on October 2, 2025, the parties waived a bifurcated hearing, waived having a hearing to present additional evidence and further oral argument, and requested that the Court rule based upon the October 2, 2025 hearing. Thus, based upon the testimony, exhibits, and the closing arguments, the Court makes the following findings and rulings:

(1) Respondent's (Ms. Glaze's) Motion to Dismiss Petitioner's Bill of Review is GRANTED; The Court finds that Petitioner did not make a prima facie case that he had a meritorious defense to the paternity suit; and
(2) In addition, or in the alternative, Petitioner's (Mr. Badu's) Bill of Review is DENIED; Petitioner did not prove the elements of his Bill of Review by a preponderance of the evidence; The Court finds that Ms. Glaze's prior husband was not a necessary party to the paternity suit, and that Mr. Badu and his attorney had every opportunity in the hearing to question her about any previous marriages; The Court also finds that in the underlying IV-D Paternity suit, Petitioner requested and agreed to a DNA Paternity Test, which found he was not excluded as the biological father; The IV-D Court then signed on January 25, 2017, an Agreed Paternity Order establishing that Petitioner was the legal father of the child the subject of the suit; Petitioner was not prevented from presenting his defense because of the extrinsic fraud of Respondent. (Ms. Glaze to prepare Order Granting her Motion to Dismiss and Denying Mr. Badu's Bill of Review)

Signed this 22nd day of January, 2026.

Judge Presiding

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Envelope ID: 110389963
Filing Code Description: No Fee Documents
Filing Description: Memorandum Ruling
Status as of 1/23/2026 11:29 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	1/23/2026 8:14:33 AM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	1/23/2026 8:14:33 AM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	1/23/2026 8:14:33 AM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	1/23/2026 8:14:33 AM	SENT

Filed 1/26/2026 1:38 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se,	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, ERIC L. GLAZE, THE STATE OF TEXAS ex rel. CHILD SUPPORT DIVISION., **Respondents.**	§	LAMPASAS COUNTY, TEXAS

PETITIONER'S MOTION TO CORRECT, MODIFY, OR CLARIFY MEMORANDUM RULING SIGNED JANUARY 22, 2026 (OR, IN THE ALTERNATIVE, MOTION FOR NEW TRIAL)

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **Petitioner, Richard K. Badu**, appearing pro se, and respectfully files this **Motion to Correct, Modify, or Clarify the Memorandum Ruling signed January 22, 2026**, or, in the alternative, a **Motion for New Trial**, and in support would respectfully show the Court as follows:

I. PROCEDURAL POSTURE AND LIMITED PURPOSE OF THIS MOTION

1. This Motion is **not** filed to relitigate evidence, retry credibility, or reargue the merits of biological parentage.
2. Rather, this Motion is narrowly directed to:
   - Correct **material misstatements of the procedural record**;
   - Clarify **unaddressed statutory prerequisites** expressly raised in the pleadings;
   - Address **intervening procedural developments** ordered by the Court but not reflected in the Memorandum Ruling;
   - Preserve accuracy of the record prior to entry of a final order and any potential appellate review.

3. Petitioner files this Motion in good faith, with respect for the Court, and to ensure that the written ruling accurately reflects both the record and the governing statutory framework.

II. THE MEMORANDUM RULING CONTAINS MATERIAL MISCHARACTERIZATIONS OF THE RECORD REGARDING GENETIC TESTING

4. The Memorandum Ruling states, in substance, that Petitioner "requested and agreed to" genetic testing in the underlying IV-D proceeding.

5. The record reflects otherwise.

6. Genetic testing was **ordered by the Court**, pursuant to **Texas Family Code Chapter 160**, through an **Order for Parentage Testing** issued at the request of the Office of the Attorney General. A true and correct copy of the Order for Parentage Testing is attached hereto as *Exhibit A*.

7. The Order for Parentage Testing:

   - Contains mandatory language ("IS ORDERED");
   - Required Petitioner to report and submit samples as directed;
   - Does not contain agreed-order language;
   - Does not reflect a negotiated or voluntary request by Petitioner.

8. Compliance with a court-ordered genetic test is not equivalent to requesting or agreeing to such testing and should not be construed as a waiver, election, or concession for purposes of a Bill of Review analysis.

9. Petitioner respectfully requests that the Court **correct or clarify** this portion of the Memorandum Ruling to accurately reflect that genetic testing occurred **by court order**, not by Petitioner's voluntary request.

III. THE MEMORANDUM RULING DOES NOT ADDRESS COURT-ORDERED JOINDER AND SUBSEQUENT DEFAULTS

A. Joinder of the Texas Office of the Attorney General

10. Following the October 2, 2025 hearing, the Court expressly identified the absence of the Texas Office of the Attorney General ("OAG") as a procedural defect and afforded Petitioner the opportunity to cure that defect.

11. Petitioner timely joined the OAG as ordered.

12. The OAG was properly served and **did not file an answer or otherwise appear**.

13. The Memorandum Ruling does not address:

- The fact of OAG joinder;
- The OAG's default;
- Whether the defect identified by the Court was deemed cured.

14. Petitioner respectfully requests clarification as to how the Court weighed, or declined to weigh, this procedural posture in reaching its ruling.

B. Joinder and Default of Eric Glaze (Presumed Father)

15. It is undisputed that:

- Respondent was married to **Eric Glaze** at the time of conception and during a substantial portion of the pregnancy;
- Texas Family Code §160.204 creates a presumption of paternity under these circumstances;
- Texas Family Code §160.603 mandates joinder of a presumed father in a proceeding to adjudicate parentage.

16. Eric Glaze was subsequently joined in this Bill of Review proceeding.

17. Eric Glaze **did not file an answer, did not appear, and did not participate.**

18. Petitioner submitted a proposed default order as to Eric Glaze; however, no default order was signed by the Court.

19. The Memorandum Ruling states that Eric Glaze "was not a necessary party," but does not address:

- The statutory basis for dispensing with mandatory joinder under §160.603;
- The effect, if any, of Eric Glaze's nonappearance;
- How the statutory presumption under §160.204 was adjudicated, rebutted, or rendered inapplicable.

20. Petitioner does **not** argue that Eric Glaze's default retroactively cures statutory defects. Rather, Petitioner respectfully submits that the absence of findings on this issue creates ambiguity and internal inconsistency warranting clarification.

IV. THE MEMORANDUM RULING CONFLATES EXTRINSIC FRAUD WITH OPPORTUNITY FOR DISCOVERY

21. The Memorandum Ruling acknowledges concealment of Respondent's marital status but concludes that Petitioner was not prevented from presenting a defense because he had an opportunity to question Respondent.

22. Petitioner respectfully submits that concealment of a legally presumed father is not merely a credibility issue but implicates:

- Statutory joinder requirements;
- The identity of necessary parties;
- The framework within which parentage could legally be adjudicated.

23. This Motion does not ask the Court to reverse its fraud determination but requests clarification as to whether the Court intended to classify the concealment as intrinsic fraud as a matter of law, and how that classification interacts with mandatory joinder statutes.

V. THE ORAL RULING AND SUBSEQUENT MEMORANDUM CREATE PROCEDURAL AMBIGUITY

24. On October 2, 2025, the Court denied Respondent's Motion to Dismiss in open court and proceeded to hear the Bill of Review on the merits.

25. The Court later identified a procedural defect and afforded Petitioner an opportunity to cure it, which Petitioner did.

26. The Memorandum Ruling subsequently grants the Motion to Dismiss but does not expressly address:

- The intervening joinder;
- The defaults that followed;
- Whether the ruling reflects reconsideration or modification of the Court's earlier oral rulings.

27. Petitioner respectfully requests clarification to ensure the written ruling accurately reflects the Court's intended procedural and legal determinations.

VI. RELIEF REQUESTED

Petitioner respectfully requests that the Court:

1. **Correct or clarify** the Memorandum Ruling to accurately reflect that genetic testing was court-ordered;

2. **Clarify** whether and how the joinder and default of the Texas OAG were considered;
3. **Clarify** the Court's legal basis for concluding that Eric Glaze was not a necessary party under Texas Family Code §160.603;
4. **Clarify** whether concealment of marital status was treated as intrinsic fraud as a matter of law;
5. Alternatively, grant a **new trial** to allow these issues to be addressed on a complete and accurate record.

VII. PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully prays that the Court grant this Motion to Correct, Modify, or Clarify, or alternatively grant a New Trial, and for such other and further relief to which Petitioner may be justly entitled.

Respectfully submitted,

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

"EXHIBIT A – Order for Parentage Testing"

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on Respondent, Theneshia Yvonne Glaze, at the email address provided in her filings (theneshia03@gmail.com), via the electronic service system (eFileTexas.gov) and by email, on this 26th day of January, 2026.

/s/ Richard K. Badu
Richard K. Badu
Petitioner, Pro Se
123 Aspire Dr.
Kissimmee, FL 34747
richard.badu@protonmail.com

Filed 1/26/2026 4:17 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Desta Morua

CAUSE NO. 25DC 23996

IN RE: THE PARENT-CHILD RELATIONSHIP OF J.V.G, A CHILD	§	IN THE DISTRICT COURT
AND	§	
RICHARD K. BADU, Petitioner, Pro Se	§	27TH JUDICIAL DISTRICT
v.	§	
THENESHIA YVONNE GLAZE, Respondent	§	
ERIC L. GLAZE	§	
	§	LAMPASAS COUNTY, TEXAS
AND	§	
The State of Texas ex rel.	§	
Office of the Attorney General,	§	
Child Support Division, Respondent	§	

ORDER GRANTING RESPONDENT'S MOTION TO DISMISS AND DENYING PETITIONER'S BILL OF REVIEW

On this day, the Court considered **Respondent's Motion to Dismiss Petitioner's Bill of Review and Petitioner's Original and Amended Petition for Bill of Review**, based upon the pleadings, testimony, exhibits, and arguments presented at the hearing held on **October 2, 2025**, and the matters thereafter submitted to the Court.

I. APPEARANCES AND PROCEDURAL HISTORY

Respondent, Theneshia Yvonne Glaze, appeared in person and represented herself pro se. Petitioner, Richard K. Badu, appeared in person and represented himself pro se. A substitute Court Reporter served as the Official Court Reporter for the 27th Judicial District Court.

Following the hearing held on October 2, 2025, the **Child Support Division of the Office of the Attorney General of Texas** was added as a necessary party and provided notice of the pending Bill of Review. The Office of the Attorney General did not file an Answer or make an appearance.

The parties waived a bifurcated hearing, waived the presentation of additional evidence and further oral argument, and requested that the Court rule based upon the testimony, evidence, and arguments presented at the October 2, 2025 hearing.

II. FINDINGS AND RULINGS

After considering all matters before the Court, the Court finds as follows:

1. **Respondent's Motion to Dismiss Petitioner's Bill of Review is GRANTED**. The Court finds that Petitioner failed to make a prima facie case that he had a meritorious defense to the underlying paternity suit.

2. **In addition, or in the alternative, Petitioner's Bill of Review is DENIED**. The Court finds that Petitioner failed to prove the elements required for a Bill of Review by a preponderance of the evidence.

3. The Court finds that **Respondent's prior husband was not a necessary party** to the underlying paternity suit.

4. The Court finds that **Petitioner and his attorney had full opportunity in the underlying proceeding to question Respondent regarding any prior marriages.**

5. The Court finds that in the underlying **IV-D paternity proceeding, court-ordered DNA testing was conducted, Petitioner did not contest or object to the testing**, was **not excluded as the biological father**, and thereafter entered into an **Agreed Order of Paternity**, signed on January 25, 2017, adjudicating Petitioner as both the legal and biological father of the child.

III ORDER

IT IS THEREFORE ORDERED that:

1. Respondent's Motion to Dismiss Petitioner's Bill of Review is GRANTED;

2. Petitioner's Original and Amended Petition for Bill of Review are DENIED in their entirety;

3. All relief requested by Petitioner and not expressly granted herein is DENIED.

This Order disposes of all claims and parties and is a final, appealable order.

SIGNED on this 5th day of Feb., 2026.

Brenda H. Adams
JUDGE PRESIDING
27th Judicial District Court
Lampasas County, Texas

FILED
a.m. 5:00 p.m. o'clock
FEB 05 2026
By Deputy
District Court, Lampasas County, TX
Clerk, Edith Wagner Harrison

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Envelope ID: 110475894
Filing Code Description: Proposed Order
Filing Description: Proposed Order GRANTING Respondent's Motion to Dismiss BoR; DENYING Petitioner's BoR
Status as of 1/28/2026 4:47 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Richard K.Badu		richard.badu@protonmail.com	1/26/2026 4:17:31 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	1/26/2026 4:17:31 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	1/26/2026 4:17:31 PM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	1/26/2026 4:17:31 PM	SENT

Filed 2/19/2026 9:23 AM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Linda Burkett

CAUSE NO. 25DC 23996

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
J.V.G.,	§	**27TH DISTRICT COURT**
	§	
	§	
A CHILD	§	**LAMPASAS COUNTY, TEXAS**

PETITIONER'S NOTICE OF APPEAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Richard K. Badu, Petitioner in the above-styled and numbered cause, and files this Notice of Appeal pursuant to Texas Rule of Appellate Procedure 25.1, and in support shows the following:

1. Trial Court and Case Number This appeal is taken from the 27th Judicial District Court of Lampasas County, Texas, in Cause Number 25DC 23996.

2. Order Appealed Petitioner desires to appeal from the Order Granting Respondent's Motion to Dismiss and Denying Petitioner's Bill of Review, signed by the Court on February 5, 2026.

3. Court of Appeals This appeal is taken to the Third Court of Appeals of Texas, located in Austin, Texas, which has appellate jurisdiction over Lampasas County.

4. Party Filing Notice This notice is filed by Richard K. Badu, Petitioner, appearing through counsel.

5. Timeliness of Appeal. This appeal is timely filed. The judgment was signed on February 5, 2026. Petitioner filed a *Motion to Correct, Modify, or Clarify Memorandum Ruling (Or, In the Alternative, Motion for New Trial)* on January 26, 2026. Pursuant to Texas Rule of Civil Procedure 306c and Texas Rule of Appellate Procedure 27.2, this premature motion is deemed filed on the date of, but subsequent to, the signing of the judgment. Accordingly, the deadline to file this Notice of Appeal was extended to 90 days after the judgment was signed pursuant to Texas Rule of Appellate Procedure 26.1(a).

6. Information Required by TRAP 25.1(d)(9) This appeal involves a matter brought by or against a governmental unit (The State of Texas ex rel. Office of the Attorney General, Child Support Division).

Respectfully submitted,

BARINA LAW GROUP, PLLC
2207 Birdcreek Drive
Temple, TX 76502

/s/ Bobby Dale Barina
Bobby Dale Barina
Attorney for Richard K. Badu
Bar no: 01738480
Office Phone: (254) 699-3755
Email: serve@barinalaw.com

Certificate of Service

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on February 19, 2026:

Theneshia Yvonne Glaze Email: theneshia03@gmail.com

Eric L. Glaze Email: ericglaze11@hotmail.com

Office of the Attorney General – Child Support Division Email: CSD-legal-704@texasattorneygeneral.gov

/s/ Bobby Dale Barina
Bobby Dale Barina
Attorney for Richard K. Badu

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Bobby Barina on behalf of Bobby Barina
Bar No. 1738480
bobbydalebarina@barinalaw.com
Envelope ID: 111444700
Filing Code Description: Notice of Appeal
Filing Description: Petitioners Notice of Appeal
Status as of 2/19/2026 11:03 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Eric LemontGlaze		ericglaze11@hotmail.com	2/19/2026 9:23:26 AM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	2/19/2026 9:23:26 AM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	2/19/2026 9:23:26 AM	SENT
Bobby DBarina		serve@barinalaw.com	2/19/2026 9:23:26 AM	SENT

Filed 2/27/2026 3:14 PM
Edith Wagner Harrison
District Clerk
Lampasas County, Texas
Reviewed By: Linda Burkett

CAUSE NO. 25DC 23996

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
	§	
	§	
J.V.G.,	§	**27th JUDICIAL DISTRICT**
	§	
	§	
	§	
	§	
A CHILD,	§	**LAMPASAS COUNTY, TEXAS**

APPELLANT'S REQUEST FOR PREPARATION OF THE CLERK'S RECORD AND REPORTER'S RECORD

TO THE DISTRICT CLERK OF LAMPASAS COUNTY AND THE OFFICIAL COURT REPORTER OF THE 27TH JUDICIAL DISTRICT COURT:

COMES NOW, Richard K. Badu, Petitioner/Appellant, through his attorney, Bobby Dale Barina, files this Request for Preparation of the Clerk's Record and Reporter's Record pursuant to Texas Rules of Appellate Procedure 34.5 and 34.6.

I. REQUEST FOR CLERK'S RECORD Appellant requests that the District Clerk prepare the Clerk's Record in this case. Pursuant to Texas Rule of Appellate Procedure 34.5, Appellant requests that the Clerk's Record include all items required by TRAP 34.5(a), including the court's docket sheet, as well as the following specific documents and any attached exhibits filed in this cause:

1. Petitioner's Original Petition for Bill of Review (filed August 15, 2025);

2. Respondent's Original Answer to Petition for Bill of Review (filed September 18, 2025);

3. Respondent's Motion to Dismiss and Proposed Order (filed September 18, 2025);

4. Petitioner's Response in Opposition to Respondent's Motion to Dismiss (filed September 22, 2025);

5. Petitioner's First Amended Original Petition for Bill of Review (filed September 29, 2025);

6. Petitioner's Motion for Entry of Default and to Deem Eric L. Glaze in Default (filed October 7, 2025);

7. Respondent's Objection/Response to Petitioner's Motion for Default Judgment (filed October 10, 2025);

8. The Court's Memorandum Ruling (signed October 28, 2025);

9. Petitioner's Second Amended Original Petition for Bill of Review (filed October 30, 2025);

10. Petitioner's Statement to Stand on Existing Testimony and Argument (filed December 30, 2025);

11. The Court's Memorandum Ruling (signed January 22, 2026);

12. Petitioner's Motion to Correct, Modify, or Clarify Memorandum Ruling Signed January 22, 2026 (Or, In the Alternative, Motion for New Trial) (filed January 26, 2026);

13. Order Granting Respondent's Motion to Dismiss and Denying Petitioner's Bill of Review (signed February 5, 2026);

14. Petitioner's Notice of Appeal (filed February 19, 2026);

15. This Request for Preparation of the Clerk's Record and Reporter's Record; and

16. Any Statement of Inability to Afford Payment of Court Costs filed by Petitioner (if applicable).

II. REQUEST FOR REPORTER'S RECORD Pursuant to Texas Rule of Appellate Procedure 34.6(b), Appellant requests that, Melinda Walker, the Official Court Reporter (or the substitute Court Reporter who served on the date of the hearing) prepare a Reporter's Record of the proceedings. Appellant requests that the Reporter's Record include the full transcript of all testimony, oral arguments, and all exhibits admitted or offered into evidence during the following hearing:

- **Date:** October 2, 2025

- **Matter:** Hearing on the Merits of Petitioner's Bill of Review and Respondent's Motion to Dismiss.

Respectfully submitted,

Barina Law Group, PLLC
2207 Birdcreek Drive
Temple, Tx 76502

/s/ Bobby Dale Barina
Bobby Dale Barina
State Bar No. 01738480
Attorney for Richard K. Badu

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record, unrepresented parties, and the Official Court Reporter for the 27th Judicial District Court via the Texas e-filing system (eFileTexas.gov), email, and/or certified mail on this 27 day of February, 2026:

Court Reporter, 27th Judicial District Court Melinda Walker, Lampasas County Courthouse Melwalker213@gmail.com

Theneshia Yvonne Glaze Email: theneshia03@gmail.com

Eric L. Glaze Email: ericglaze11@hotmail.com

Office of the Attorney General – Child Support Division Email: CSD-legal-704@texasattorneygeneral.gov

/s/ Bobby Dale Barina
Bobby Dale Barina
Attorney for Richard K. Badu

Automated Certificate of eService

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Bobby Barina on behalf of Bobby Barina
Bar No. 1738480
bobbydalebarina@barinalaw.com
Envelope ID: 111824852
Filing Code Description: Request
Filing Description: REQUEST FOR PREPARATION OF THE CLERK???S RECORD AND REPORTER???S RECORD
Status as of 3/10/2026 8:47 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Bobby DBarina		serve@barinalaw.com	2/27/2026 3:14:10 PM	SENT
Eric LemontGlaze		ericglaze11@hotmail.com	2/27/2026 3:14:10 PM	SENT
Theneshia YvonneGlaze		theneshia03@gmail.com	2/27/2026 3:14:10 PM	SENT
Managing Attorney		CSD-legal-704@texasattorneygeneral.gov	2/27/2026 3:14:10 PM	SENT
Bobby Barina		bobbydalebarina@barinalaw.com	2/27/2026 3:14:10 PM	SENT

CIVIL DOCKET No. 25DC 23996

NUMBER OF CASE	STYLE OF CASE	ATTORNEYS	KIND OF ACTION	DATE OF FILING Month Day Year
25DC 23996	THE PARENT-CHILD RELATIONSHIP OF; JORDAN VONNE GLAZE, A CHILD; RICHARD K. BADU		ALL OTHER CIVIL CASES	08/19/2025
	VS	Plaintiffs		Jury Demanded by
Fee Book	THENESHIA YVONNE GLAZE; ERIC L. GLAZE			Jury Fee. $
Vol Page		Defendants		Paid by

DATE OF ORDERS Month	Day	Year	WAS STENOGRAPHER USED: _____	ORDER OF COURT	MINUTE BOOK VOL.	PAGE	PROCESS
10	2	2025		M & A appear pro se; Record made. - BW; Opening Statements; M & A Testify; Closing Argu. made; Taken under Advisement.			
11	22	2025		Respondent Motion for Dismissal - Granted Petitioner Bill of Review - Denied - Memorandum Ruling - JFF			
2	5	2026		Order signed Granting Motion to Dismiss & Denying Pet's Bill of Review. JFF			

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CLERK'S CERTIFICATE THAT APPELLATE RECORDS ARE TRUE AND CORRECT

The State of Texas
County of Lampasas

I, Edith Wagner Harrison, Clerk of the 27th District Court of Lampasas County, Texas do hereby certify that the documents contained in this record to which this certification is attached are all of the documents specified by Texas Rule of Appellate Procedure 34.5(a) and all other documents timely requested by a party to this proceeding under Texas Rule of Appellate Procedure 34.5(b). GIVEN UNDER MY HAND AND SEAL at my office in Lampasas, County, Texas this 28th day of March, 2024.

Signature of Clerk Linda Kay Burkett

Name of Clerk Linda Kay Burkett

Title Deputy District Clerk