CAUSE NO._____

| | | |
|---|---|---|
| PLAINTIFF NAME | § | IN THE DISTRICT COURT |
| | § | |
| VS. | § | ____ JUDICIAL DISTRICT |
| | § | |
| DEFENDANT NAME | § | ____ COUNTY, TEXAS |

**MOTION TO ENLARGE THE ORDER APPOINTING THE RECEIVER**

NOW COMES PLAINTIFF, _____ (*Plaintiff's Name*), who complains of _____ (*Defendant's Name*). and would respectfully show this Court the following:

**I.**

**FACTUAL BACKGROUND**

1. By its Order Appointing Receiver on _____ (*date of Original Order*), this Court appointed Receiver _____ (*Receiver's name*). Pursuant to the Court's Order, the Receiver _____ (*description of actions from original Order – eg: entered the premises to possess, control, and deal with the business operations and property or otherwise apply the property and/or proceeds toward satisfaction of Judgment Creditor's judgment*). The Order states that all persons, firms and corporations are hereby enjoined from interfering with the receiver's exclusive possession of the above described property until final judgment of this Court.

2. (*Additional facts about why the Receivership Estate should be enlarged*)

## II.

## REQUESTED RELIEF

3. Therefore, based upon the foregoing facts, Plaintiff requests that the Order Appointing Receiver be enlarged to allow Receiver to _____ (*description of desired relief*).

4. Plaintiff further requests that the original Order be expanded as more particularly described in the proposed order attached as Exhibit "1", which is fully incorporated herein by reference for all purposes, to aid Receiver in her _____ (*describe objective*) and therefore subject to the immediate possession and control of the Receiver pursuant to the Court's Order, Plaintiff requests its reasonable and necessary attorneys' fees incurred in the filing of this Motion and its accompanying Order pursuant to the Texas Turnover Statute, and for such other and further relief to which Plaintiff may be entitled, both at law and in equity in the Court's discretion.

Respectfully submitted,

*(Firm Name)*

By:

_____

(s*ignature)*
*Attorney Name*
*Address*
*Phone Number*
*State Bar ID*
Attorney for Plaintiff

**VERIFICATION**

STATE OF TEXAS §
COUNTY OF _____ §

Before me the undersigned Notary Public, on this day personally appeared ____ (*name*), and after being duly sworn, stated under oath that __ (*he/she*) is the _____ (*party designation*) in this cause; that ____ (*he/she*) has read the above Motion for Appointment of Receiver; and that every statement contained in it is within _____ (*his/her*) personal knowledge and is true and correct. _____ (*signature of affiant*)

Subscribed and sworn before me on _____(*date*).

_____ (*signature*)
*(seal)* (*typed name*)
Notary Public in and for the State of Texas
My commission expires: _____ (*date*)

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