

CAUSE NO. 25-JSC-11-00524

SALI'S ROOFING, LLC	§	IN THE JUSTICE COURT
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	§	
V.	§	PRECINCT 1, PLACE 1
	§	
	§	
TAMARA MCFARLANE	§	FORT BEND COUNTY, TEXAS

PLAINTIFF'S MOTION FOR NO-ANSWER DEFAULT JUDGMENT

Plaintiff Sali's Roofing, LLC ("Plaintiff") asks the Court to enter a default judgment against Defendant Tamara McFarlane ("Defendant"), and in support shows as follows:

I. Introduction

1. Plaintiff is a Texas limited liability company that provides roofing services. The Defendant against whom a default judgment is sought is Tamara McFarlane, an individual residing in Richmond, Fort Bend County, Texas.

2. The Plaintiff sued the Defendant for failure to pay amounts due and unpaid for roof replacement and related services rendered.

II. Facts

3. On March 19, 2025, the Plaintiff filed its Petition in this suit.
4. Citation was issued by the court, and, on April 7, 2025 the Defendant was served.
5. The proof of service has been on file with the court for at least ten days.
6. The Defendant's answer date was on or before April 21, 2025. The Defendant did not file an answer or otherwise make an appearance.
7. The Defendant's last known address is 11403 Sardinia Drive, Richmond, Texas 77406. Attached as Exhibit A is a certificate of the Defendant's last known address.

8. On reasonable information and belief, Defendant is not a member of the United States military. Attached as Exhibit B is an sworn declaration regarding Defendant's military status. Plaintiff has searched the Service Member's Civil Relief Act database using Defendant's name and date of birth per business records to verify her non-military status and a copy of such certificate is attached to Exhibit B.

III. Liability & Damages

9. The Plaintiff is entitled to a default judgment on liability and damages.

10. The damages in Plaintiff's Petition are liquidated, are proven by a written instrument, and may be accurately calculated. Attached as Exhibit C is a sworn declaration setting forth the damages with the supporting written instrument (final invoice). Accordingly, no hearing is necessary to establish the amount of damages.

11. Alternatively, if the Court deems such written instrument insufficient, Plaintiff requests the Court to set an evidentiary hearing solely on the issue of damages.

IV. Conclusion

12. Plaintiff is entitled to a default judgment in the form attached hereto for the reasons asserted in this motion.

V. Prayer for Relief

13. Wherefore, Plaintiff Sali's Roofing, LLC asks the Court to enter a default judgment granting:

- a. Judgment against the Defendant for Ten Thousand, Nine-Hundred and Ninety-One Dollars and Seventy-Three Cents (\$10,991.73);
- b. Prejudgment and post-judgment interest as provided by law;
- c. Costs of suit; and

- d. Such other and further relief to which the plaintiff may be justly entitled.

Respectfully submitted,

BY: Michael Marcinko

Michael Marcinko, Authorized Employee
Sali's Roofing, LLC
3050 Post Oak Blvd. #510
Houston, Texas 77056
(214) 499-4272
Mike@SalisRoofing.com

CERTIFICATE OF SERVICE

This is to certify that the foregoing document has been forwarded to the following party via certified mail on this the 13th day of July, 2025:

Tamara McFarlane
11403 Sardinia Drive
Richmond, Texas 77406

Michael Marcinko
Michael Marcinko

CAUSE NO. 25-JSC-11-00524

SALI'S ROOFING, LLC

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IN THE JUSTICE COURT

V.

PRECINCT 1-1, OF

TAMARA MCFARLANE

FORT BEND COUNTY, TEXAS

FINAL DEFAULT JUDGMENT

On _____, Plaintiff, Sali's Roofing, LLC, moved for default judgment against the Defendant Tamara McFarlane ("Defendant"), because the Defendant failed to file a timely answer in this case. No hearing was held because damages are liquidated, proven by a written instrument, and were accurately calculated. The Court determined it had jurisdiction over the subject matter and the parties in this proceeding.

The Court finds the following:

1. The Defendant was served with citation and a copy of Plaintiff's Petition on April 7, 2025.
2. The proof of service was on file with this Court for at least ten days before the judgment was rendered.
3. The Defendant's answer date was on or before April 21, 2025. The Defendant did not file an answer or otherwise enter an appearance.
4. The Defendant's last known address is 11403 Sardinia Drive, Richmond, Texas 77406.
5. The Defendant is not an active-duty member of the United States military.
6. The damages claimed in the Plaintiff's Petition are liquidated and proven by a written instrument, which permits a calculation without the necessity of an evidentiary hearing.

After considering the pleadings and the papers on file in this case, the Court grants Plaintiff's Motion for Default Judgment against the Defendant Tamara McFarlane.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that Plaintiff, Sali's Roofing, LLC, recover from Defendant, Tamara McFarlane, the sum of Ten Thousand, Nine-Hundred and Ninety-One Dollars and Seventy-Three Cents (\$10,991.73), prejudgment interest on that sum at the annual rate of ____ percent (___) in the sum of \$ _____, post-judgment

interest on the total sum at the annual rate of _____ percent (____), and fees and costs in the amount of _____.

The Court orders execution to issue for this judgment.

SIGNED on _____, 2025.

Judge Presiding

CAUSE NO. 25-JSC-11-00524

Sali's Roofing, LLC

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IN THE JUSTICE COURT

V.

PRECINCT 1-1, OF

TAMARA MCFARLANE

FORT BEND COUNTY, TEXAS

EXHIBIT A:
CERTIFICATE OF LAST KNOWN ADDRESS

TO THE CLERK OF THIS COURT:

Sali's Roofing, LLC, plaintiff in the above-entitled and numbered cause, certifies to the clerk of this Court that the last known mailing address of Tamara McFarlane, the Defendant in the above-entitled and numbered cause against whom a default judgment will be rendered is as follows:

11403 Sardinia Drive
Richmond, Texas 77406

Respectfully submitted,

BY: Michael Marcinko
Michael Marcinko, Authorized Employee
Sali's Roofing, LLC
3050 Post Oak Blvd. #510
Houston, Texas 77056
(214) 499-4272
Mike@SalisRoofing.com

Sali's Roofing, LLC

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IN THE JUSTICE COURT

V.

PRECINCT 1-1, OF

TAMARA MCFARLANE

FORT BEND COUNTY, TEXAS

EXHIBIT B:
PLAINTIFF'S MILITARY SERVICE DECLARATION

Pursuant to TEX. CIV. PRAC. & REM. CODE § 132.001(a), the declarant, Michael Marcinko, declares the following under penalty of perjury:

1. "I, Michael Marcinko, am the authorized employee of Sali's Roofing, LLC. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I have no information or indications from my interactions with or business records regarding the Defendant indicating that the Defendant is a member of the United States military.

3. Attached to this affidavit is a true and correct copy of a certificate from the Department of Defense Servicemember's Civil Relief Act database ("the SCRA Certificate") dated July 12, 2025 establishing that Defendant Tamara McFarlane, born September 21, 1974 per our business records, is not a member of the United States military. Sali's Roofing, LLC's outside legal counsel, Jyotpal Singh, personally acquired this SCRA Certificate by searching the Department of Defense's Service Members Civil Relief Act Database, using the Defendant's name and date of birth per our business records.

4. My name is Michael Marcinko, my date of birth is October 3rd, 1993, and my address is 2112 Atwood Dr Anna, Texas 75409, United States. I declare under penalty of perjury that the foregoing is true and correct."

Executed in Collin County, State of Texas , on the 13th day of July, 2025

Michael Marcinko

Michael Marcinko



**Status Report
Pursuant to Servicemembers Civil Relief Act**

SSN:
 Birth Date: Sep-XX-1974
 Last Name: MCFARLANE
 First Name: TAMARA
 Middle Name:
 Status As Of: Jul-12-2025
 Certificate ID: G339KY0QQLXRBRJ

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. HOWEVER, WITHOUT A SOCIAL SECURITY NUMBER, THE DEPARTMENT OF DEFENSE MANPOWER DATA CENTER CANNOT AUTHORITATIVELY ASSERT THAT THIS IS THE SAME INDIVIDUAL THAT YOUR QUERY REFERS TO. NAME AND DATE OF BIRTH ALONE DO NOT UNIQUELY IDENTIFY AN INDIVIDUAL.

Sam Yousefzadeh

Sam Yousefzadeh, Director
 Department of Defense - Manpower Data Center
 4800 Mark Center Drive, Suite 04E25
 Alexandria, VA 22350

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense (DoD) that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. § 3901 et seq, as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service. Service contact information can be found on the SCRA website's FAQ page (Q35) via this URL: <https://scra.dmdc.osd.mil/scra/#/faqs>. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. § 3921(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC § 101(d) (1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC § 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC § 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected

WARNING: This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.

Sali's Roofing, LLC

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IN THE JUSTICE COURT

V.

PRECINCT 1-1, OF

TAMARA MCFARLANE

FORT BEND COUNTY, TEXAS

EXHIBIT C:
PLAINTIFF'S LIQUIDATED DAMAGES DECLARATION

Pursuant to TEX. CIV. PRAC. & REM. CODE § 132.001(a), the declarant, Michael Marcinko, declares the following under penalty of perjury:

1. "I, Michael Marcinko, am the authorized employee of Sali's Roofing, LLC. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. Attached hereto is a true and correct copy of the final invoice owed by Tamara McFarlane in the amount of Ten Thousand, Nine-Hundred and Ninety-One Dollars and Seventy-Three Cents (\$10,991.73).

3. My name is Michael Marcinko, my date of birth is October 3rd, 1993, and my address is 2112 Atwood Dr Anna, Texas 75409, United States. I declare under penalty of perjury that the foregoing is true and correct."

Executed in Collin County, State of Texas , on the 13th day of July, 2025

Michael Marcinko

Michael Marcinko

EXHIBIT C



Sali's Roofing
10930 Switzer Avenue
Suite 123
Dallas, TX 75238
Phone: (469) 677-0239

Final Invoice

07/07/2025

Claim Information

Liberty Mutual

Claim Number: 057552744

Company Representative
Brad Sykes
Phone: (214) 499-4272
Brad@salisroofing.com

Liberty Mutual Claim # 057552744

Total Project Amount - \$40,625.59

Amount Paid - \$29,680.90 (3 checks):

\$5,159.00 on 09/21/2024
\$16,521.90 on 09/25/2024
\$8,000.00 on 10/08/2024

Amount Due - \$10,944.69

Tamara McFarlane
26006 Kyler Cove Lane
Katy, TX 77494
(832) 653-0112

Job: 807: Tamara McFarlane

Roofing Section

Line Items 1-30 RCV - \$35,484.31

Full Roof Replacement Completed 09/19/2024

Felt and existing shingles removed down to decking. (50.31SQ)
Re-nailed decking.
Replaced 4 sheets of OSB decking.
Installed synthetic underlayment. (50.31SQ)
Installed new drip edge.
Installed starter strip along eaves and rake line to keep roof dry.
Installed Class 3 UIL Impact Rating Certainteed Landmark shingles to specifications. (57.67 SQ)
Installed Certainteed XT25 Ridge cap shingles.
Replaced 7 Gable Cornice Returns.
Installed new ridge vent.
Installed new pipe jacks. (9)
Installed ice and water shield in the valleys. (160LF)
Installed new exhaust caps.
Replaced rain diverter.
Additional Steep Charges for > 10 pitch applied.
Additional Height Allowance for 2 story roof applied.
Painted all soft metals on roof to match shingle color.
Hauled all debris and trash from property.

Shingle Type - Certainteed Landmark AR (Moire Black)
CLASS 3 UIL IMPACT RESISTANT

Customer has a 5-Year Workmanship Warranty Valid Through 09/19/2024 - 09/19/2029

(if any issues occur related to our workmanship please call our office at 469-677-0239 or contact your Project Manager so we can fix it)

Customer has a Certainteed SURESTART Lifetime Shingle Manufacturer Defect Warranty

Gutters Section

Line items 31-36 RCV - \$3,541.28

- Removed and disposed of the existing gutters and downspouts.
- New 5" aluminum seamless gutters installed.
- Installed rain diverters.

- Installed new downspouts.

Exterior Section

Standing Seam Metal Porch Cover Painted

\$1600

TOTAL

\$10,944.69

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.

Jyotpal Singh on behalf of Jyotpal Singh
Bar No. 24070627
JP@JPSinghLaw.com
Envelope ID: 103064057
Filing Code Description: Motion Filed
Filing Description: Motion for Default Judgment
Status as of 7/14/2025 11:42 AM CST

Associated Case Party: Sali's Roofing

Name	BarNumber	Email	TimestampSubmitted	Status
Michael Marcinko		mike@salisroofing.com	7/13/2025 1:47:01 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jyotpal Singh		JP@JPSinghLaw.com	7/13/2025 1:47:01 PM	SENT