

CAUSE NO. 2015-65325

KIEN VAN DANG	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
UNIFIED BUDDHIST CHURCH OF	§	
VIETNAM - GIAO HOI PHAT GIAO	§	
VIET NAM THONG NHAT d/b/a	§	
VAN PHONG II VIEN HOA DAO,	§	
	§	
Defendant.	§	113TH JUDICIAL DISTRICT

**PLAINTIFF'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S MOTION  
FOR TRADITIONAL AND NO-EVIDENCE SUMMARY JUDGMENT**

TO THE HONORABLE MICHAEL LANDRUM:

Plaintiff, Kien Van Dang ("Dang"), files this Supplemental Response to Defendant's Motion for Traditional and No-Evidence Summary Judgment and would show the Court as follows:

**I.  
INTRODUCTION**

Dang files this Supplemental Response to supplement the summary judgment record with the bylaws of Defendant Unified Buddhist Church of Vietnam - Giao Hoi Phat Giao Viet Nam Thong Nhat d/b/a Van Phong II Vien Hoa Dao ("UBCV Texas"). Contrary to the false testimony of monk Pham Dang a/k/a Thich Giac Dang ("Monk Dang") that UBCV Texas has no members. UBCV's articles of incorporation and bylaws establish that it has members. A true and correct copy of UBCV Texas's bylaws are attached to this Supplemental Response as Exhibit "5."

**II.**  
**PRAYER**

For the reasons in his Response and Supplemental Response, Plaintiff Kien Van Dang asks the Court to deny UBCV Texas's Motion for Traditional and No-Evidence Summary Judgment, and any such further relief, at law or in equity, to which Plaintiff may show himself justly entitled.

Respectfully submitted,

**THE TAMMY TRAN LAW FIRM**  
**ATTORNEYS AT LAW, LLP**

**/s/ TAMMY TRAN**

By: \_\_\_\_\_

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**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon counsel of record in compliance with the Texas Rules of Civil Procedure on the 7th day of July 2017.

*/s/John Na*

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JOHN NA

Unofficial Copy Office of Chris Daniel District Clerk