CAUSE NO. 2018-06752

FREE AND SOVEREIGN STATE OF	§	IN THE DISTRICT COURT OF
VERACRUZ DE IGNACIO DE LA LLAVE	§	
Plaintiff,	§	
	§	127TH JUDICIAL DISTRICT
VS.	§	
	§	HARRIS COUNTY, TEXAS
	§	
JAIME REVERTE, JMA REVERTE	§	
PROPERTIES LLC, AZULGRANA	§	
MANAGEMENT, LLC, GIMAL REVERTE	§	
PROPERTIES, LLC, REVERTE FAMILY	§	
LIVING TRUST and JAVIER DUARTE	§	· · · · · · · · · · · · · · · · · · ·
DE OCHOA	§	
Defendants.	§	JURY TRIAL DEMANDED

PLAINTIFF'S EMERGENCY MOTION FOR DISCOVERY PURSUANT TO THE TCPA

Defendant Terraventura Development recently filed a motion to dismiss pursuant to CPRC Chpt. 27 – the Anti-SLAPP statute. The Anti-SLAPP statute provides that upon a showing of good cause the Court may allow specified and limited discovery relevant to the motion. CPRC § 27.006(b). Even after a brief review of Defendant's motion, it is clear Defendant complains that Plaintiff cannot produce enough evidence to meet its burden to demonstrate a prima facie case of theft. However, as this Court is also aware, discovery is automatically stayed after the filing of an Anti-SLAPP motion. In this circumstance, Defendant attempts to use Plaintiff's inability to engage in discovery as both a sword and shield. As such, and because of the specific arguments made by Defendant, specifically that Plaintiff cannot produce enough evidence, or 'tracing' of funds that had been stolen, Plaintiff now seeks leave to do discovery on these issues. Plaintiff would like to depose a corporate representative of Terraventura Developments, and send a limited amount of paper discovery related to the funds used to buy the real estate in question.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: <u>/s/ Anthony G.Buzbee</u>

Anthony G. Buzbee
State Bar No. 24001820
Christopher J. Leavitt
State Bar No. 24053318
tbuzbee@txattorneys.com
JP Morgan Chase Tower
600 Travis, Suite 6850
Houston, Texas 7002
Telephone: (713) 223-5393

Facsimile: (713) 223-5909

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been duly served on all known counsel of record and pro se parties in accordance with the Texas Rules of Civil Procedure on July 19, 2018.

Via Facsimile: (713) 574-3224

Murray Fogler
Jas Brar
FOGLER, BRAR, FORD, O'NEIL & GRAY, LLP
909 Fannin Street, Suite 1640
2 Houston Center
Houston, TX 77010

Via Facsimile: (281) 210-1361

Bret L. Strong Laura F. Dumas Kristen Bates THE STRONG FIRM, P.C. 1790 Hughes Landing Blvd, Suite 200 The Woodlands, TX 77380

Via Facsimile: (281) 419-0250

James H. Stilwell MARTIN, EARL & STILWELL, LLP 1400 Woodloch Forrest Drive, Suite 590 The Woodlands, TX 77380

/s/ Christopher J. Leavitt
Christopher J. Leavitt