

CAUSE NO. 2018-06526

FREE AND SOVEREIGN STATE OF
VERACRUZ DE IGNACIO DE LA LLAVE,
Plaintiffs

VS.

JOSE A. MANSUR, JR., M1 WOODLANDS,
LLC, M1 VILLAGE, LLC, TEXAS
SOUTHMAN, INC. AND JAVIER DUARTE
DE OCHOA,
Defendants

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IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

190TH JUDICIAL DISTRICT

MOTION FOR LEAVE TO FILE THIRD-PARTY PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, JOSE MANSUR, JR., Defendant herein, requesting leave of this honorable Court to file a third-party petition against MIGUEL ANGEL YUNES, Individually, a person not now a party to this action under the provisions of Rule 38 of the Texas Rules of Civil Procedure, on the following grounds:

1. Pleadings in Underlying Action

1.01. By the Original Petition filed in this cause, Plaintiff has filed claims that Movant, along with others has engaged in actions, amounting to the conversion of the treasury of the State of Veracruz, Mexico. The Veracruz governor at the of the filing of the present action is Miguel Angel Yunes, who is also the person responsible for initiating, authorizing and approving the filing of the present action against Movant.

2. Third-Party Defendant's Liability

2.01. Movant alleges that the public statements made by Miguel Angel Yunes were false and defamatory, that he undertook actions, and conspired with others, designed to extort properties from Movant by threats of criminal actions, and that he wrongfully filed criminal

complaints against Movant. Miguel Angel Yunes, Individually, is liable to the Movant for his wrongful actions.

2.02. A true and correct copy of the proposed Third-Party Petition is attached to this motion as EXHIBIT "A," and by way of reference, incorporated herein for all purposes.

Prayer

WHEREFORE, PREMISES CONSIDERED, Defendants request that his Court grant the third-party plaintiff permission to file and proceed with the prosecution of the Third-Party Petition in the form attached hereto, and that the Court make such other Orders as are just.

Respectfully submitted,

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By: /s/ Dennis Sanchez
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ATTORNEY FOR JOSE MANSUR, JR.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing answer has been served on all counsel of record electronically, on this 30th day of November, 2018.

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