

CAUSE NO. 2018-06526

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

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 OF

190th JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR LEAVE TO DESIGNATE EXPERTS

Plaintiff files this Motion for Leave to designate its experts outside the deadline, and, in support, would respectfully show this Court the following:

BACKGROUND

This is a case involving the theft of billions of dollars of state funds. Plaintiff is the victim of this theft. Plaintiff is attempting to secure discovery from Defendants, which they are unwilling to provide.

Pursuant to the DCO, Plaintiff's expert designation deadline is December 31, 2018. Plaintiff needs to secure additional discovery prior to designating experts. In order to avoid a re-designation, or an amendment of the designation, Plaintiff requests an extension to designate experts outside the current deadline.

ARGUMENT AND AUTHORITIES

TRCP 5 permits the Court, for cause shown, to allow for the enlargement of any specified time period, or permit an act to be done outside the specified time period. Plaintiff's designation deadline is December 31, 2018. Plaintiff is requesting that it be allowed to designate its experts outside of the prescribed time period. A trial court's decision to deny a motion to modify a

discovery control plan is on an abuse of discretion standard. Defendant has suffered no prejudice or surprise, and still has ample time to conduct discovery on these experts.

CONCLUSION & PRAYER

For these reasons, Plaintiff respectfully requests that this Court grant Plaintiff's Motion for Leave, and for such other relief to which it is entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been duly served upon all known counsel of record and/or pro se parties in accordance with the Texas Rules of Civil Procedure on, December 27, 2018.

/s/ Anthony G. Buzbee
Anthony G. Buzbee

Unofficial Copy Office of Marilyn Burgess District Clerk