

**CAUSE NO. 2019-33415**

**ABEL AND NANCY VERA, ET AL.,**

*Plaintiffs,*

v.

**FIGURE FOUR PARTNERS, LTD., PSWA, INC.,  
and REBEL CONTRACTORS, INC.,**

*Defendants.*

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**IN THE DISTRICT COURT OF**

**HARRIS COUNTY, TEXAS**

**234th JUDICIAL DISTRICT**

**FIGURE FOUR'S AND PSWA'S OBJECTIONS TO SUBPOENA TO LJA**

Defendants Figure Four Partners, Ltd. ("Figure Four") and PSWA, Inc. ("PSWA") object to the subpoena issued by Plaintiffs to non-party LJA Engineering & Surveying ("LJA") and, in support thereof, respectfully shows the Court as follows:

On September 24, 2019, Plaintiffs sent Figure Four and PSWA a copy of the subpoena Plaintiffs purported to serve upon LJA. *See* Exhibit A. By agreement between LJA and Plaintiffs, LJA's objections and response to the subpoena are due October 31.

***Confidentiality***

As a preliminary matter, LJA's anticipated document production is subject to the Court's Joint Stipulated Confidentiality Order ("Agreed Order"). *See* Agreed Order at para. A.1. Figure Four and PSWA reserve the right to designate documents as "Confidential" pursuant to the Agreed Order to the extent necessary. If the parties are unable to agree to a process for implementing the Agreed Order, Figure Four or PSWA may request guidance from the Court to effectuate the Agreed Order as applied to LJA's anticipated document production.

***Request Nos. 2 and 3***

Figure Four and PSWA object to request nos. 2 and 3 set forth in Exhibit A to the subpoena because they are not limited to the facts, claims, and causes of action made the subject of this



[gwhite@grayreed.com](mailto:gwhite@grayreed.com)

1601 Elm Street, Suite 4600

Dallas, Texas 75201

Telephone: (214) 954-4135

Facsimile: (214) 953-1332

**ATTORNEYS FOR DEFENDANTS FIGURE  
FOUR PARTNERS, LTD. and PSWA, INC.**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was duly furnished to the following counsel of record (1) electronically through the electronic filing manager ([www.efiletexas.gov](http://www.efiletexas.gov)), and (2) via e-mail on this 31st day of October, 2019 as follows:

Jason C. Webster  
Heidi O. Vicknair  
Omar R. Chawdhary  
The Webster Law Firm  
6200 Savoy Drive, Suite 150  
Houston, Texas 77036  
[filing@thewebsterlawfirm.com](mailto:filing@thewebsterlawfirm.com)

and

Kimberley M. Spurlock  
Spurlock & Associates, P.C.  
17280 West Lake Houston Pkwy.  
Humble, Texas 77346  
[kspurlock@spurlocklaw.com](mailto:kspurlock@spurlocklaw.com)  
[Mcone@spurlocklaw.com](mailto:Mcone@spurlocklaw.com)

### *Attorneys for Plaintiffs*

William J. Cozort  
Matthew R. Maddox  
Sarai S. Neuman  
Two Memorial City Plaza  
820 Gessner, Suite 1075  
Houston, Texas 77024  
[wcozort@brothers-law.com](mailto:wcozort@brothers-law.com)  
[mmaddox@brothers-law.com](mailto:mmaddox@brothers-law.com)  
[sneuman@brothers-law.com](mailto:sneuman@brothers-law.com)

### *Attorneys for Defendant, Rebel Contractors, Inc.*

Kyle D. Weynand  
500 Dallas, Suite 1200  
Houston, Texas 77002  
[KyleWeynand@mehaffyweber.com](mailto:KyleWeynand@mehaffyweber.com)

### *Attorney for Defendant TEXASITE LLC*

