

**CAUSE NO. 2019-72692**

**PAMELA CRAFT AND  
TAMIKA CRAFT**

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**IN THE DISTRICT COURT**

**VS**

**164<sup>TH</sup> JUDICIAL DISTRICT**

**ALEXIS EVANS, SAMUEL WEBB,  
AND AUTO CLUB COUNTY  
INSURANCE COMPANY**

**HARRIS COUNTY, TEXAS**

**DEFENDANT AUTO CLUB COUNTY INSURANCE COMPANY'S MOTION TO QUASH  
DEFENDANT EVANS' AMENDED NOTICE OF INTENTION TO TAKE THE ORAL  
DEPOSITION OF DEFENDANT SAMUEL WEBB**

Defendant, Auto Club County Insurance Company, files this Motion to Quash Defendant Alexis Evans' First Amended Notice of Intention to Take the Oral Deposition of Samuel Webb and respectfully represents and shows the following:

1. On or about Wednesday, February 23, 2022 Defendant was served with Defendant's Evans' First Amended Notice of Intention to Take the Oral Deposition of Samuel Webb. *See Exhibit A.*
2. This First Amended Notice changed the date and time of the deposition of Samuel Webb from Friday, February 25, 2022 at 10:00 a.m. to Tuesday, March 1, 2022 at 10:00 a.m.
3. Counsel for Defendant is not available to participate in a deposition at the date and time listed in Defendant Evans' First Amended Notice. Counsel for Defendant will provide dates on which defense counsel is available for deposition in March.
4. As this Motion is being filed within three (3) days of service of the notice, this deposition is automatically quashed.

BASED ON THE FOREGOING, Defendant requests, if necessary, that this Motion to Quash be granted in its entirety and for such other and further relief to which Defendants may be justly entitled.

Respectfully submitted,

**WALTERS, BALIDO & CRAIN, L.L.P.**

BY: /s/ William R. Rustam  
WILLIAM R. RUSTAM  
TBN: 00791584  
2500 Tanglewilde, Suite 250  
Houston, Texas 77063  
713-335-0285  
FAX 713-335-0286  
Rustamedocs@wbclawfirm.com

**ATTORNEY FOR DEFENDANT AUTO  
CLUB COUNTY MUTUAL INSURANCE  
COMPANY**

**CERTIFICATE OF SERVICE**

This is to certify that on this 25th day of February, 2022, a true and correct copy of the above and foregoing was served upon all counsel of record pursuant to the Texas Rules of Civil Procedure.

/s/ William R. Rustam  
WILLIAM R. RUSTAM

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Stephanie Richardson on behalf of Bill Rustam  
Bar No. 791584  
Stephanie.Richardson@wbclawfirm.com  
Envelope ID: 62070526  
Status as of 2/25/2022 8:21 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Tamika Craft		demmingassociates@gmail.com	2/25/2022 7:50:20 AM	SENT
William RRustam		rustamedocs@wbclawfirm.com	2/25/2022 7:50:20 AM	SENT
Kenneth Baugh		kbaughlawoff@comcast.net	2/25/2022 7:50:20 AM	SENT
Kevin Shaw		kevshaw@geico.com	2/25/2022 7:50:20 AM	SENT
CKay Schwamkrug		chschwamkrug@geico.com	2/25/2022 7:50:20 AM	SENT