

**CAUSE NO. 2022-33409**

**MARIA P. REBOLLAR**  
*Plaintiff,*

v.

**PMG INVESTMENTS, L.L.C.**  
*Defendant.*

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§

**IN THE DISTRICT COURT OF**

**HARRIS COUNTY, TEXAS**

**295<sup>th</sup> JUDICIAL DISTRICT**

**DEFENDANT'S MOTION TO COMPEL DISCOVERY**

PMG Investments, L.L.C., (PMG) Defendant, files this Motion to Compel.

1. On June 23, 2022, PMG sent a Request for Production of Documents and Interrogatories to Plaintiff Maria Rebollar. A copy of the email and the requested discovery is attached as Exhibit 1.
2. Plaintiff has not responded.
3. On August 4, 2022, PMG sent a follow-up email to Plaintiff's attorney on the status of the Responses. A copy of the email is attached as Exhibit 2.
4. Again, there was no response.
5. On August 16, 2022, PMG sent another email regarding the Discovery. Exhibit 3.
6. On August 19, 2022, PMG sent a third email to Plaintiff's attorney. Exhibit 4.
7. Again there was no response.
8. In addition to the emails, PMG's attorney called the phone number for Plaintiff's attorney in an attempt to discuss the discovery.
9. No one answers the phone at the attorney's office and no message or voicemail could be left for counsel.

**RELIEF SOUGHT**

10. PMG seeks an order requiring Plaintiff Rebollar to respond to the discovery, to answer all Interrogatories and to produce all requested documents.

WHEREFORE, PMG requests that the Court grant all requested relief and any relief to which it may be entitled.

Respectfully submitted,

JERRY L. SCHUTZA

By: s/ Jerry L. Schutza

Jerry L. Schutza  
State Bar No. 17853800  
815 Walker, Ste. 1453  
Houston, Texas 77002  
Tel. (713) 963-9988  
Fax. (713) 963-0085  
Email: schutzalaw@yahoo.com

**ATTORNEY FOR PMG INVESTMENTS,  
L.L.C.**

**CERTIFICATE OF CONFERENCE**

Prior to filing this Motion, I attempted to confer with opposing counsel but as stated above, the office of Plaintiff's attorney does not answer the phone and there has been no response to several emails.

/s/ Jerry L. Schutza  
Jerry L. Schutza

**CERTIFICATE OF SERVICE**

I hereby certified that a true and correct copy of the foregoing instrument was sent to opposing counsel and all parties of interest via electronic service on September 7, 2020.

**VIA ELECTRONIC SERVICE**

Tim Yusuf

Ernie Garcia

/s/ Jerry L. Schutza  
Jerry L. Schutza

### 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.

JERRY SCHUTZA on behalf of JERRY SCHUTZA

Bar No. 17853800

schutzalaw@yahoo.com

Envelope ID: 68087637

Status as of 9/9/2022 9:43 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Tim Yusuf		tyusuf@yusuflegal.com	9/8/2022 8:00:48 PM	SENT
Martin Acosta		mart_tx@yahoo.com	9/8/2022 8:00:48 PM	SENT
Jerry L. Schutza	17853800	schutzalaw@yahoo.com	9/8/2022 8:00:48 PM	SENT

# EXHIBIT 1

2022-33409

From: Jerry Schutza (schutzalaw@yahoo.com)  
To: tyusuf@yusuflegal.com  
Date: Thursday, June 23, 2022 at 05:31 PM CDT

Mr. Yusuf

I represent Nick Bhagia and PMG Investments, LLC.

Before filing the enclosed pleadings I called your office to discuss this case with you but no one answers your phone. I could not leave a voicemail message.

Please see the attached:

Defendants Answer;  
Defendants Special Exceptions;  
Defendants Request For Production Of Documents; and  
Defendants Interrogatories.

I understand that there is a hearing set on Monday which appears to be moot at this point. Do you intend on proceeding or will the hearing be passed? Please let me know.

If you would like to discuss the case, give me a call.

Jerry L. Schutza  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988

Begin forwarded message:

**From:** "Gaston & Thanheiser, P.C." <gastonscanner@gmail.com>  
**Date:** June 23, 2022 at 5:13:50 PM CDT  
**To:** Jerry Schutza <schutzalaw@yahoo.com>  
**Subject:** Send data from MFP12032076 06/23/2022 17:12

Scanned from MFP12032076  
PUBLIC TEMPLATE GROUP  
SCAN TO \_JLS  
Date:06/23/2022 17:12  
Pages:12  
Resolution:200x200 DPI

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DO NOT REPLY



DOC062322.pdf  
697.3kB

CAUSE NO. 2022-33409

MARIA PIEDAD REBOLLAR	§	IN THE DISTRICT COURT
	§	
v.	§	
	§	
PMG INVESTMENTS, LLC, NANIK BHAGIA, GTLD INTERNATIONAL PROPERTY MANAGEMENT LLC AND GUILLERMO MARQUEZ	§ § § §	HARRIS COUNTY, TEXAS  295 <sup>th</sup> JUDICIAL DISTRICT

**DEFENDANTS PMG INVESTMENTS, LLC AND NANIK BHAGIA'S REQUESTS  
FOR PRODUCTION TO PLAINTIFF MARIA PIEDAD REBOLLAR**

TO: Plaintiff Maria Piedad Rebollar, by and through her counsel of record, S. Tim Yusof, 11200 Broadway, Suite 2743, Pearland, Texas 77584.

DEFENDANTS PMG INVESTMENTS, LLC AND NANIK BHAGIA propounds their Requests for Production to Plaintiff Maria Piedad Rebollar, pursuant to the Texas Rules of Civil Procedure, to be answered by Plaintiff within thirty (30) days of the date of service. Unless otherwise agreed, all documents are to be produced at the office of Defendants' attorney on the first business day after thirty (30) days from service of these requests.

Respectfully submitted,

JERRY L. SCHUTZA

By: /s/ Jerry L Schutza  
Jerry L. Schutza  
SBN: 17853800  
815 Walker, Ste. 1453  
Houston, Texas 77002  
Telephone: (713) 963-9988  
Facsimile: (713) 963-0085  
Email: schutzalaw@yahoo.com

**ATTORNEY FOR DEFENDANTS  
PMG INVESTMENTS, LLC AND NANIK  
BHAGIA**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of June 2022, a true and correct copy of the foregoing instrument was forwarded by e-service, email, certified mail, return receipt requested, and/or by hand delivery and/or by fax transmission to counsel of record and any Pro Se parties.

**VIA ELECTRONIC SERVICE**

S. Tim Yusuf  
Yusuf Legal Group, P.C.  
Pearland Town Center  
11200 Broadway, Suite 2743  
Pearland, Texas 77584

By: /s/ Jerry L. Schutza  
Jerry L. Schutza



## REQUESTS FOR PRODUCTION TO PLAINTIFF

1. All cancelled checks, receipts, and all documents which reflect any and all payments on the Note which is described in Plaintiff's Original Petition.

### **RESPONSE:**

2. All correspondence between Enrique Robollar and PMG Investments L.L.C. and/or Nanik Bhagia.

### **RESPONSE:**

3. All attorneys' fees invoices and time sheets for Plaintiff in regard to this case.

### **RESPONSE:**

4. All documents which establish that Plaintiff has any interest in the Property which is described in Plaintiff's Original Petition.

### **RESPONSE:**

5. All correspondence between Karem Milani and Enrique Robollar.

### **RESPONSE:**

6. All documents which contain any false statements made by either PMG Investments, L.L.C. and/or Nanik Bhagia.

### **RESPONSE:**

CAUSE NO. 2022-33409

MARIA PIEDAD REBOLLAR	§	IN THE DISTRICT COURT
	§	
v.	§	
	§	
PMG INVESTMENTS, LLC, NANIK BHAGIA, GTLD INTERNATIONAL PROPERTY MANAGEMENT LLC AND GUILLERMO MARQUEZ	§	HARRIS COUNTY, TEXAS
	§	
	§	295 <sup>th</sup> JUDICIAL DISTRICT

**DEFENDANTS PMG INVESTMENTS, LLC AND NANIK BHAGIA'S FIRST SET OF INTERROGATORIES TO PLAINTIFF MARIA PIEDAD REBOLLAR**

TO: Plaintiff Maria Piedad Rebollar, by and through her counsel of record, S. Tim Yusuf, 11200 Broadway, Pearland, Texas 77584.

DEFENDANTS PMG INVESTMENTS, LLC AND NANIK BHAGIA propound their First Set of Interrogatories to Plaintiff Maria Piedad Rebollar, pursuant to the Texas Rules of Civil Procedure, to be answered by Plaintiff within thirty (30) days of the date of service.

Respectfully submitted,

JERRY L. SCHUTZA

By: /s/ Jerry L Schutza

Jerry L. Schutza

SBN: 17853800

815 Walker, Ste. 1453

Houston, Texas 77002

Telephone: (713) 963-9988

Facsimile: (713) 963-0085

Email: schutzalaw@yahoo.com

**ATTORNEY FOR DEFENDANTS  
PMG INVESTMENTS, LLC AND NANIK  
BHAGIA**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of June 2022, a true and correct copy of the foregoing instrument was forwarded by e-service, email, certified mail, return receipt requested, and/or by hand delivery and/or by fax transmission to counsel of record and any Pro Se parties.

**VIA ELECTRONIC SERVICE**

S. Tim Yusuf  
Yusuf Legal Group, P.C.  
Pearland Town Center  
11200 Broadway, Suite 2743  
Pearland, Texas 77584

By: /s/ Kevin Powers  
Kevin Powers

## INTERROGATORIES

1. State every payment and /or credit on the note which is described in Plaintiff's Original Petition.

**ANSWER:**

2. For each communication that you have had with Nanik Bhagia or anyone on behalf of PMG Investments, Inc.:

- a. State the date;
- b. Identify all parties who were a party to or a witness to each communication;
- c. Identify the type or mode of communication; and
- d. State the substance of each communication.

**ANSWER:**

3. For each and every false statement or representation made by Nanik Bhagia and/or PMG Investment, L.L.C.:

- a. State the date;
- b. Identify the parties and/or witnesses to each statement; and
- c. state each specific statement and/or representation which was made and by whom.

**ANSWER:**

# EXHIBIT 2

2022-33409

From: Jerry Schutza (schutzalaw@yahoo.com)

To: tyusuf@yusuflegal.com

Date: Thursday, August 4, 2022 at 09:27 AM CDT

Tim

Can you advise me on the status of this case? I called your office to discuss this case but your phone is not answered and I could not leave a message.

On June 23 I sent some discovery. Although responses were due within 30 days I have received no responses. Please advise as to when responses will be sent.

If you would like to discuss this case please give me a call.

Jerry L. Schutza  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988

# EXHIBIT 3

Fwd: 2022-33409

From: Jerry Schutzta (schutzalaw@yahoo.com)  
To: tyusuf@yusuflegal.com  
Date: Tuesday, August 16, 2022 at 11:50 AM CDT

Tim

Following up on my prior email. Can you let me know the status of the discovery responses?

Jerry L. Schutzta  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988

Begin forwarded message:

**From:** Jerry Schutzta <schutzalaw@yahoo.com>  
**Date:** August 4, 2022 at 9:27:15 AM CDT  
**To:** tyusuf@yusuflegal.com  
**Subject:** 2022-33409

Tim

Can you advise me on the status of this case? I called your office to discuss this case but your phone is not answered and I could not leave a message.

On June 23 I sent some discovery. Although responses were due within 30 days I have received no responses. Please advise as to when responses will be sent.

If you would like to discuss this case please give me a call.

Jerry L. Schutzta  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988



# EXHIBIT 4

Fwd: 2022-33409

From: Jerry Schutza (schutzalaw@yahoo.com)  
To: tyusuf@yusuflegal.com  
Date: Friday, August 19, 2022 at 10:40 AM CDT

Tim

Following up on my prior emails.

What is the status of this case and your client's discovery responses? It has been almost 2 months since we met and discussed this case at the courthouse. I need to hear from you or I will have no alternative but to file a motion with the court.

Let me know what's going on.

Jerry L. Schutza  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988

Begin forwarded message:

**From:** Jerry Schutza <schutzalaw@yahoo.com>  
**Date:** August 16, 2022 at 11:50:07 AM CDT  
**To:** tyusuf@yusuflegal.com  
**Subject:** Fwd: 2022-33409

Tim

Following up on my prior email. Can you let me know the status of the discovery responses?

Jerry L. Schutza  
Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988

Begin forwarded message:

**From:** Jerry Schutza <schutzalaw@yahoo.com>  
**Date:** August 4, 2022 at 9:27:15 AM CDT  
**To:** tyusuf@yusuflegal.com  
**Subject:** 2022-33409

Tim

Can you advise me on the status of this case? I called your office to discuss this case but your phone is not answered and I could not leave a message.

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If you would like to discuss this case please give me a call.

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Attorney At Law  
815 Walker, Suite 1453  
Houston, Texas 77002  
713-963-9988