

No. 2022 68763

**HOUSTON SECURED DEVELOPMENT  
PARTNERS, LLC**

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**IN THE DISTRICT COURT OF**

vs.

**HARRIS COUNTY, TEXAS**

**HSDP BAM, LLC AND  
JOSEPH JACKSON**

**151ST JUDICIAL DISTRICT**

**NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Defendant by and through their attorney(s) of record: **Warren F. Muhammad (Law Office of Warren F. Muhammad)**

You will please take notice that twenty-four (24) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

**Theo Rivers, EQ Solutions LLC (Financial)  
800 Town & Country Blvd., Ste. 300  
Houston, TX 77024**

before a Notary Public for **Innovative Legal Solutions, Inc.  
5910 Rose Street  
Houston, TX 77007  
713.658.0802 Fax 713.658.0704**

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 205.1 (b) (c), Texas Rules of Civil Procedure, V.T.C.A., Finance Code 59.006 and Chapter 30, Texas Civil Practice and Remedies Code, 30.007. Production of Financial Institution Records, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

**Exhibit 'A'**

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

**Ms. Mary Alice Parsons  
The Parsons Law Firm  
4545 Bissonnet St., Suite 104  
Bellaire, TX 77401  
713-955-4878 Fax 713-589-2454  
Attorney for Plaintiff  
Email: mary@parsonslawtexas.com  
SBA # 00791409**

*Ms. Mary Alice Parsons*  

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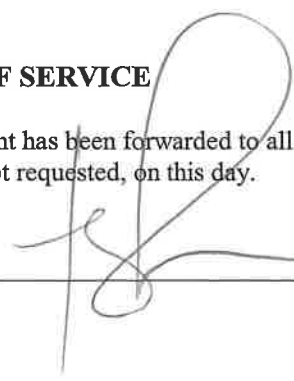
Ms. Mary Alice Parsons

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, electronic delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: December 20, 2022

by

A handwritten signature in black ink, consisting of a large loop at the top and a horizontal line at the bottom, positioned above a horizontal line that extends across the page.

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**HOUSTON SECURED DEVELOPMENT  
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**vs.**

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**IN THE DISTRICT COURT OF**

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**ATTORNEYS OF RECORD:**

Ms. Mary Alice Parsons  
The Parsons Law Firm  
4545 Bissonnet St., Suite 104  
Bellaire, TX 77401  
713-955-4878 Fax: 713-589-2454

Warren F. Muhammad  
Law Office of Warren F. Muhammad  
6112 Wheatley Street  
Houston, TX 77091  
800-397-7760 Fax: 713-510-1504

HOUSTON SECURED DEVELOPMENT  
PARTNERS, LLC

vs.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

151ST JUDICIAL DISTRICT

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS**

Custodian of Records for: **Theo Rivers, EQ Solutions LLC**

Records Pertaining To: **Exhibit 'A'**

Type of Records: **Any and all records, contained in your files, as described on the attached Exhibit 'A'**

1. Please state your full name.

Answer: \_\_\_\_\_

2. Please state by whom you are employed and the business address.

Answer: \_\_\_\_\_

3. What is the title of your position or job?

Answer: \_\_\_\_\_

4. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?

Answer: \_\_\_\_\_

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: \_\_\_\_\_

6. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 4. Have you complied? If not, why?

Answer: \_\_\_\_\_

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations.

Answer: \_\_\_\_\_

8. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: \_\_\_\_\_

9. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: \_\_\_\_\_

10. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: \_\_\_\_\_

11. Was the method of preparation of these records trustworthy?

Answer: \_\_\_\_\_

\_\_\_\_\_  
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

HOUSTON SECURED DEVELOPMENT  
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**EXHIBIT 'A'**

**Documents to be produced:**

Any and all documents relating to *Houston Secured Development Partners, LLC* for the period of July 1, 2016, through the present, including, but not limited to:

1. Any and all accounting records, tax records, or other financial documents including but not limited to federal and state tax returns (including any schedules), financial statements, general ledgers, trial balance (both unadjusted and adjusted), adjusting journal entries, balance sheets, income statements, statements of cash flow, quarterly sales and payroll tax returns and correspondence from tax authorities.
2. Any and all documents provided by Joseph Jackson or anyone on behalf of Houston Secured Development Partners, LLC which were used to prepare financial statements, balance sheets, or individual or corporate tax returns or schedules thereto.