

CAUSE NO. 2022-68763

HOUSTON SECURED DEVELOPMENT § IN THE DISTRICT COURT
PARTNERS §
§
VS. § 151st JUDICIAL DISTRICT
§
HSDP BAM LLC AND BAYLOR ASSET §
MANAGEMENT ET AL § OF HARRIS COUNTY, TEXAS

DEFENDANTS' RESPONSE TO PLAINTIFF HOUSTON SECURED DEVELOPMENT
PARTNERS, LLC'S MOTION TO COMPEL DISCOVERY RESPONSES

TO: PLAINTIFF, HOUSTON SECURED DEVELOPMENT PARTNERS, LLC, BY AND THROUGH IT'S ATTORNEY OF RECORD, MARY PARSONS, THE PARSON LAW FIRM, 4545 BISSONNET STREET, SUITE 104, BELLAIRE, TEXAS 77401.

COMES NOW, HSDP BAM LLC and BAYLOR ASSET MANAGEMENT, et al,
Defendants in the above-numbered and entitled cause and pursuant to the Texas Rules of Civil Procedure files the following Response to Plaintiffs Motion to Compel Discovery.

Defendants did not receive the filed Discovery Request, dated December 9, 2022, via e-file or other means. Furthermore, plaintiff did not attempt to conference with Defendants' counsel to resolve the matter prior to filing the motion. Defendants are asking the court to grant us 30 days from the filing of this response to provide our answers.

Respectfully submitted,

LAW OFFICE OF WARREN FITZGERALD
MUHAMMAD

By: /s/Warren Fitzgerald Muhammad
Warren Fitzgerald Muhammad
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Certificate of Service

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on February 22, 2023.

/s/Warren Fitzgerald Muhammad
The Law Office of Warren F. Muhammad
State Bar NO. 07089500
Attorney for Defendants

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