

R. Tate Young

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November 1, 2023

Via First Class Mail and
Email: danielle.jimenez@hcdistrictclerk.com
Ms. Danielle Jimenez
Harris County Civil Courthouse
201 Caroline, 9th Floor
Houston, Texas 77002

Re: Request for Supplement to Clerk's Record for
Cause No. 2022-66023, *David Soliz v. J and B
Hicks, et al*, in the 80th Judicial District Court
Harris County, Texas

Dear Ms. Jimenez,

I am co-counsel with Mr. Daniel C. Pappas for the Defendants in the above cause. The Plaintiff/Appellant David Soliz has filed an appeal in this matter now pending in the Court of Appeals for the First District, Houston, Harris County, Texas. It bears Appeals Number 01-23-00604. Recently, the Appellant Mr. Soliz had requested, and you compiled and filed, the Clerk's Record in the Court of Appeals.

In accordance with the Texas Rules of Appellate Procedure, all of the Appellees-Defendants ask that you please prepare, file and certify as a supplement to and part of the Clerk's Record the following pleadings, documents and other papers to the extent not already included in the Clerk's Record submitted to the First Court of Appeals:

1. Defendant's Original Answer.
2. Defendant, J and B Hicks, Inc. dba Eastex Collision Repair and dba US 59 Enterprises' Special Exceptions to Plaintiff's Original Petition and Defendant's Motion to Dismiss Certain Causes of Action.
3. Notice of Submission for the Defendant's Special Exceptions and Motion to Dismiss as to Plaintiffs First Amended Original Petition and Request for Discovery and all subsequent pleading.
4. Defendant's Motion for Summary Judgment and No-Evidence Motion for Summary Judgment with Notice of Submission.
5. Notice of Oral Hearing for Defendant's Motion for Summary Judgment and No-Evidence Motion for Summary Judgment.

6. Order signed on April 17, 2023 denying Plaintiff's First Amended Motion to Deny J and B Hicks, Inc. Special Exceptions.
7. Objections and Response to Plaintiffs [sic] Motion to Deny Defendants [sic] Summary Judgment and No-Evidence Motion for Summary Judgment.
8. Objections and Response to Plaintiff [sic] First Amended Motion to Deny Defendants [sic] Summary Judgment and No-Evidence Motion for Summary Judgment and Non-Movant Request for Striking Defendants [sic] Dustin Dietert Affidavit of Fact and Sactions [sic].
9. Order Granting Objections and Response to Plaintiffs [sic] Motion to Deny Defendants [sic] Summary Judgment and No-Evidence Motion for Summary Judgment signed on April 28, 2023.
10. Order Granting Objections to Plaintiff [sic] First Amended Motion to Deny Defendants [sic] Summary Judgment and No-Evidence Motion for Summary Judgment and Non-Movant Request for Striking Defendants [sic] Dustin Dietert Affidavit of Fact and Sactions [sic].
11. Final Judgment signed on April 28, 2023.
12. Response to Plaintiff's Motion for New Trial and Vacate Summary Judgement and No-Evidence Summary Judgment [sic].
13. Response and Objections to Plaintiffs [sic] First Amended Motion for New Trial and Vacate Summary Judgement and No-Evidence Summary Judgment [sic].
14. Objections to Plaintiff's Late Filed Exhibits.
15. Order Denying Plaintiffs [sic] First Amended Motion for New Trial and Vacate Summary Judgement and No-Evidence Summary Judgment [sic].

I ask that you let me know when these documents have been prepared and filed with the Court of Appeals. Please contact me should you have any questions or need further information.

Respectfully,

/s/ R. Tate Young

Cc: Mr. Daniel C. Pappas
Mr. David Soliz
Honorable Deborah Young, First Court of Appeals

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Case Contacts

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