

**CASE NO. 2020-73679**

**MANUEL A. ACOSTA AND  
ROSARIO S. ACOSTA**

**VS.**

**PECHUA, A NEVADA  
CORPORATION, *et al.***

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**IN THE DISTRICT COURT**

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

**OF HARRIS COUNTY, TEXAS**

**DEFENDANTS' MOTION FOR LEAVE FOR EXPERT TO APPEAR AT TRIAL  
REMOTELY BY ZOOM**

Defendants, Pechua, a Nevada Corporation, Vinh Truong as Trustee of the Acosta Family Trust, Countrywide Asset Management, LLC, Preforeclosure Specialist, LLC, Quang V. Truong, as Trustee of the Westcrest Specialist Trust, Realstone Advisors & Associates, LLC, Jessica Davalos, and Vinh Quang Truong a/k/a Quang V. Truong (together the "Defendants"), hereby move this Court for leave allowing their expert Ken Crawford to appear for trial remotely by Zoom. In support thereof, Defendants respectfully show as follows:

In support of its defenses and counterclaims in this case, Defendants have designated handwriting experts Dale Stobaugh ("Mr. Stobaugh") and Ken Crawford ("Mr. Crawford").

Mr. Stobaugh was originally supposed to testify in this matter, but he recently had major back surgery and was also diagnosed with other conditions that prevent his travel and testimony. Therefore, Mr. Crawford has had to step in for Mr. Stobaugh as testifying expert. Mr. Crawford resides in the Temple, Texas area and is unable to attend trial in

person. Mr. Crawford is 72 years old and lives alone with pets who need daily care. He has a bad back and if he had to drive he would have to take many driving breaks. Mr. Crawford very much prefers to testify by Zoom to avoid these issues, and timely and costly travel in general.

**CERTIFICATE OF SERVICE**: The undersigned, by his signature below, certifies that he has communicated with counsel for Plaintiffs and that Plaintiffs are OPPOSED to Mr. Crawford appearing remotely by Zoom at trial.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court allow Ken Crawford to appear for trial remotely as detailed above.

Respectfully submitted,

**JEFFREY JACKSON & ASSOCIATES, PLLC**

/s/ Jeffrey C. Jackson

**JEFFREY C. JACKSON**

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Defendant's Original Answer has been forwarded to all parties or their counsels of record pursuant to the Texas Rules of Civil Procedure on this 23<sup>rd</sup> day of January, 2024

**Andrew Wheeler**

**Ted A. Cox**

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*Attorneys for Plaintiffs*

/s/ Jeffrey C. Jackson

**JEFFREY C. JACKSON**

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#### Case Contacts

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