

CAUSE NO. 2024-67186

**GALLERIA LOOP NOTE
HOLDER, LLC**

v.

**TIG ROMSPEN US MASTER
MORTGAGE, LP**

And

GEORGE LEE

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

164th JUDICIAL DISTRICT

**PLAINTIFF'S REQUEST FOR EMERGENCY HEARING ON
PLAINTIFF'S MOTION TO COMPEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Galleria Note Holder, LLC, Plaintiff herein, filing this its Request for Emergency Hearing on Plaintiff's Motion to Compel and would respectfully show the Court as follows:

1. The Plaintiffs' Original Petition was filed on September 30, 2024.
2. A Temporary Restraining Order (the "TRO") was signed in this matter on September 30, 2024 which included a provision that Plaintiff and Defendant were to mediate the issues presented in Plaintiff's Petition prior to the scheduled Temporary Injunction hearing.
3. Despite multiple requests from Plaintiff's counsel to Defendant's counsel regarding dates Defendant might be available to mediate, as well as options for a mediator, Defendant's counsel has refused to cooperate.
4. It is believed that Defendant is willfully ignoring this Court's order so that

Defendant can repost the subject Property for the December foreclosure sale (just weeks away) and circumvent the TRO's mandatory mediation requirement, thus, circumventing Plaintiff's right to have the Court make the determination as to whether the TRO should be transitioned into a temporary injunction.

5. Unfortunately, this Court's calendar is completely full for several months and so requesting a hearing via traditional means will be too late to accomplish the mediation requirement in the TRO as well as preventing Plaintiff from having their Temporary Injunction heard timely.
5. Accordingly, Plaintiff requests an emergency hearing on the matter to address Plaintiff's Motion to Compel to avoid unnecessary delays and bad faith attempts to undermine a court signed order.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully request that this Court grant Plaintiff's Request for Emergency Hearing on Plaintiff's Motion to Compel as well as for such other and further relief to which the Court deems appropriate.

Respectfully Submitted by,

Law Office of Erick DeLaRue, PLLC

By: /s/ Erick DeLaRue

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that that a copy of the foregoing was sent to all counsel of record on November 5, 2024 in accordance with the Texas Rules of Civil Procedure.

/s/ Erick DeLaRue

ERICK DELARUE

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