CAUSE NO. 2023-54391

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RENE GUERRON *Plaintiff,*

v.

ERICK BORLASCA, PT – PATRIOT TITLE, LLC, KARLA JIMENEZ, WESTERN SURETY COMPANY AND PATRICIA GARZA Defendants

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

11TH JUDICIAL DISTRICT

PLAINTIFF'S MOTION FOR NON-SUIT WITH REJUDICE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff, RENE GUERRON, in the above entitled and numbered cause of

action, and pursuant to Texas Rule of Civil Procedure No. 162, files this Motion for Non-Suit With

Prejudice against WESTERN SURETY COMPANY in this matter.

Court costs shall be taxed against the party incurring same.

Respectfully Submitted,

PHIPPS GARZA PLLC

<u>Erik F. Garza/s/</u>

Erik Garza State Bar No. 24090117 <u>Erik@pgfirm.net</u> Roshun A. Phipps State Bar No. 24088968 <u>Roshun@pgfirm.net</u> 2060 North Loop West, Suite 140 Houston, Texas 77018 Telephone: 713-677-0423 Facsimile: 346-335-2912 **ATTORNEYS FOR PLAINTIFF**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above instrument was served on all parties and/or counsel of record in accordance with the Texas Rules of Civil Procedure on this the 10th day of January 2025.

Nancy H. Hamren State Bar No. 09549430 nhamren@coatsrose.com Steven G. Hamren State Bar No. 24099841 shamren@coatsrose.com **COATS ROSE, P.C.** 9 Greenway Plaza, Suite 1000 Houston, Texas 77046 Telephone: (713) 653-7362 Facsimile: (713) 651-0220 **ATTORNEYS FOR DEFENDANT** WESTERN SURETY COMPANY **Rayito Stephens** State Bar No. 24121841 rstephens2014@gmail.com **RAYITO O. STEPHENS LAW OFFICES, PLLC** 12234 Shadow Creek Parkway, Suite 2100 Pearland, Texas 77584 Telephone: (281) 507-2831 ATTORNEY FOR DEFENDANT PATRICIA GARZA Karla Jimenez karla.c.jimenez@gmail.com 15307 Quiet Creek Drive Houston, Texas 72095 PRO SE DEFENDANT Erick Borlasca, Jr. simplewealthinvestments@gmail.com 1530 Quiet Creek Drive Houston, Texas 77095 **PRO SE DEFENDANT**

Erik F. Garza/s/

Erik F. Garza

Automated Certificate of eService

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Cheyanne Barrera on behalf of Erik Garza Bar No. 24090117 cheyanne@pgfirm.net Envelope ID: 96091939 Filing Code Description: Motion (No Fee) Filing Description: Plaintiff's Motion for Non-Suit with Prejudice Status as of 1/10/2025 3:03 PM CST

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