

ERIC TORRES, ADAM SINN,
XS CAPITAL MANAGEMENT, L.P.,
AND ASPIRE COMMODITIES, L.P.,

Plaintiffs,

v.

CRAIG TAYLOR AND
ATLAS COMMODITIES, L.L.C.,

Defendants.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

157TH JUDICIAL DISTRICT

**PLAINTIFF ADAM SINN’S OBJECTIONS AND ANSWERS TO
DEFENDANTS’ THIRD SET OF INTERROGATORIES**

TO: Defendants Craig Taylor, James Marshall and Atlas Commodities, LLC by and through their attorneys of record, Geoffrey Berg and Kathryn E. Nelson, Berg Feldman Johnson Bell, LLP, 4203 Montrose Boulevard, Suite 150, Houston, Texas 77006

Plaintiff Adam Sinn serves his objections and answers to Defendants Craig Taylor, James Marshall, and Atlas Commodities, LLC’s Third Set of Interrogatories.

Respectfully submitted,

RAPP & KROCK, PC



Kenneth M. Krock
State Bar No. 00796908
Megan N. Brown
State Bar No. 24078269
Matthew M. Buschi
State Bar No. 24064982
1980 Post Oak Boulevard, Suite 1200
Houston, Texas 77056
(713) 759-9977 telephone
(713) 759-9967 facsimile
kkrock@rk-lawfirm.com
mbrown@rk-lawfirm.com
mbuschi@rk-lawfirm.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that, on this 5th day of August 2016, a true and correct copy of this document was served on counsel of record in accordance with the Texas Rules of Civil Procedure.

Geoffrey A. Berg
gberg@bfjblaw.com
Kathryn E. Nelson
knelson@bfjblaw.com
Berg Feldman Johnson Bell, LLP
4203 Montrose Boulevard, Suite 150
Houston, Texas 77006

Via Email



Matthew M. Buschi

GENERAL OBJECTIONS

- 1) Plaintiff objects to these discovery requests, definitions, and instructions as overly broad and unduly burdensome because they seek to impose burdens and obligations that are greater than, or different from, those obligations set forth in the Texas Rules of Civil Procedure or the rules of this Court or other applicable laws.
- 2) Plaintiff objects to the Interrogatories to the extent that they seek Plaintiff to marshal all of its evidence.
- 3) Plaintiff objects to the Requests as untimely and not served on or prior to 30 days before of the end of the discovery period pursuant to Texas Rule of Civil Procedure 196.1.

Plaintiff incorporates these general objections into each response below whether specifically identified or not.

ANSWERS TO THIRD SET OF INTERROGATORIES

INTERROGATORY NO. 1:

Identify by name and phone number and/or email address the sender and the recipient(s) of communication(s) represented in the “Mobile Phone Examiner Plus© Report” on the page Bate-numbered SINN 000243.

ANSWER:

Sender: Greg Forero = 203-252-0080

Recipient: Adam Sinn = 979-575-7026

INTERROGATORY NO. 2:

Identify by name and phone number and/or email address the sender and the recipient(s) of the communication(s) represented in the chart on the pages Bate-numbered SINN 000244-245

ANSWER:

203-252-0080 = Greg Forero

303-717-3271 = Paul Sarver

713-202-5987 = Evan Caron

713-634-8660 = Barry Hammond

561-628-5238 = Dave Schmidli

732-221-9945 = Joon Park

281-546-0928 = Eric Torres

713-775-7588 = Brent Phelps

281-814-8836 = Bryan Tyson

INTERROGATORY NO. 3:

Identify by name the owner and/or user of the phone number 713-492-3902 (listed in your answer to Interrogatory No. 3 in Defendants’ First Set of Interrogatories).

ANSWER: Sean Kelly

INTERROGATORY NO. 4:

Provide any phone numbers owned and/or used by Dave Acevedo and Sean Kelly (named in your answer to Interrogatory No. 2 in Defendants’ First Set of Interrogatories).

ANSWER: Plaintiff has knowledge of the following phone numbers for these individuals:

Sean Kelly: 713-492-3902

Dave Acevedo: 718-909-7795

VERIFICATION

STATE OF TEXAS

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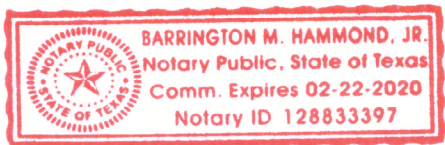
HARRIS COUNTY

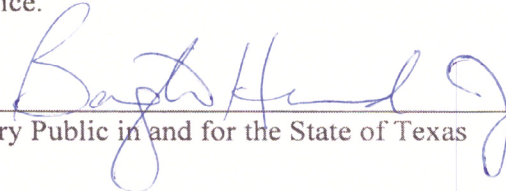
BEFORE ME, the undersigned Notary Public, on this day personally appeared Adam Sinn, the affiant, known to me to be the person whose signature appears on this verification document. According to the affiant's statements after being duly sworn on his oath, states that he has read the above and foregoing Plaintiff Adam Sinn's Objections and Answers to Defendants' Third Set of Interrogatories, and states that the facts and statements contained therein are within his personal knowledge, or are based on information made available to him or communicated to him by others, and are true and correct to the best of his knowledge.



Adam Sinn

SUBSCRIBED AND SWORN TO BEFORE ME this 5th day of August, 2016,
to certify which witness my hand and seal of office.





Notary Public in and for the State of Texas