

ESTADO LIBRE ASOCIADO DE PUERTO RICO
TRIBUNAL DE PRIMERA INSTANCIA
SALA SUPERIOR DE BAYAMÓN

PATRICK A.P. DE MAN; MIKA DE
MAN (A.K.A. MIKA KAWAJIRI-DE
MAN OR MIKA KAWAJIRI); y la
SOCIEDAD LEGAL DE BIENES
GANANCIALES COMPUESTA POR
AMBOS

Demandantes,

v.

ADAM C. SINN; RAIDEN
COMMODITIES, L.P.; RAIDEN
COMMODITIES 1 LLC; ASPIRE
COMMODITIES, L.P.; ASPIRE
COMMODITIES 1, LLC; SINN LIVING
TRUST,

Demandados.

CIVIL NÚM.: D AC2016-2144 (701)

SOBRE:

INCUMPLIMIENTO DE DEBER DE
FIDUCIA; INCUMPLIMIENTO DE
CONTRATO DE SOCIEDAD
LIMITADA; DAÑOS Y PERJUICIOS;
MALA FE Y DOLO; MALA FE EN LA
CONTRATACIÓN;
ENRIQUECIMIENTO INJUSTO.

MOCIÓN SOMETIENDO DOCUMENTO

AL HONORABLE TRIBUNAL:

COMPARECE la Parte Demandante, a través de la representación legal que suscribe, y muy respetuosamente expone, alega y solicita:

1. Durante la conferencia sobre el estado de los procedimientos celebrada el 17 de octubre de 2018, el demandante informó que se había visto precisado a sacar a sus hijos de la escuela privada en que estaban matriculados debido a la falta de ingresos. La parte demandada alegó que ello no estaba documentado.

2. Junto con esta moción, se acompaña la comunicación enviada por el Sr. Patrick De Man al director de la Escuela TESIS en Dorado, la que se explica por sí sola.

3. El demandante confronta una situación de estrechez económica, mientras los codemandados le deben \$690,847 por el pago de sus servicios.

POR TODO LO CUAL, respetuosamente solicita de este Tribunal que tome conocimiento de lo informado.

RESPECTUOSAMENTE SOMETIDA.

CERTIFICO: Haber notificado copia fiel y exacta del presente escrito al Lcdo. Alfredo F. Ramírez Macdonald (alfredo.ramirez@oneillborges.com), a la Lcda. Ana M. Rodríguez Rivera (ana.rodriguez@oneillborges.com) y Lcdo. Arturo L.B. Hernández González (arturo.hernandez@oneillborges.com), O'NEILL & BORGES, 250 Avenida Muñoz Rivera, Suite 800, San Juan, Puerto Rico 00918-1813.

En San Juan, Puerto Rico, a 18 de octubre de 2018.

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GERMAN J. BRAU
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Patrick de Man

From: Patrick de Man <pat.deman@gmail.com>
Sent: Tuesday, August 1, 2017 5:58 AM
To: howard.t@tasisdorado.com
Subject: Masa and Tomo tuition

Dear Dr. Howard,

How are you?
I hope you had a nice summer.

We regret to inform you that we unfortunately are unable to pay for school tuition for Masa and Tomo by the start of this academic year.

Since July of last year, I have been withheld significant amounts of my capital from the partnership I was a part of for over 5 years. To add insult to injury, I was sued by that partnership in Houston in September of last year (Cause number 2016-59771 in Harris County). That case got justly dismissed but is now on appeal (without much reason; just because). Having no other option, I sued the company in Bayamon court in December. With legal expenses going through the roof, we virtually exhausted our liquid means and are now preparing to put our CT condo on the market, as well as taking other measures to continue this battle.

While most likely we will be able to pay the tuition in the near future, these things take longer than expected; especially when most needed. We are not sure what Tasis's policy is for this kind of case, but we would be prepared to homeschool if Masa's and Tomo's enrollment would be cancelled for coming year.

Obviously, this is all confidential. Especially, since the other party is also a resident of Dorado. Although he has no children, one of his employees has a child in Tomo's year (K).

Sincerely,
Patrick de Man.