

CAUSE NO. 2018-42734

ABG GENERAL CONSTRUCTION	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
V.	§	269TH JUDICIAL DISTRICT
	§	
3S REAL ESTATE INVESTMENTS,	§	
LLC – SERIES 3	§	
Defendant.	§	OF HARRIS COUNTY, TEXAS

PLAINTIFF'S RESPONSE TO MOTION TO COMPEL

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES ABG General Construction, "Non-Movant" herein, filing this Response to the Motion to Compel filed in this cause by 3S Real Estate Investments, LLC – Series 3, "Movant" herein, and would show the following:

I.

Non-Movant has completely and fully responded to all outstanding discovery requests. Amended responses were served on August 31, 2018. See attached Exhibit A which contains amended responses.

Movant did not fully confer prior to filing his Motion to Compel. Movant's motion was set without adequate notice on a Harris county holiday. Movant did not allow for an opportunity to resolve without Court intervention.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Non-Movants request that the Court deny the Motion to Compel filed herein by 3S Real Estate Investments, LLC – Series 3, and for such other and further relief that may be awarded at law or in equity.

Respectfully submitted,

The Law Offices of Marcos & Associates, PC

By: _____

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CERTIFICATE OF SERVICE

I certify that on August 31, 2018 a true and correct copy of Defendants' Response to Plaintiff's Response to Defendant's Motion to Compel Discovery was served to all counsel of record as indicated below.

Javier Marcos, Jr.

Via e-file:

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