

**NO. 2018-42734**

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

**PLAINTIFF'S MOTION TO QUASH DEPOSITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COME** ABG General Construction ("Movant" herein), and requests the Court to quash a notice of deposition, and shows the following:

**I.**

On or about September 18, 2018, ABG General Construction was served with a Notice of Oral Deposition (attached herein and incorporated by reference as Exhibit "A" and referred to in this Motion as the " Plaintiff's Notice of Oral Deposition"), by Defendant, 3S Real Estate Investments, LLC - Series 3.

**II.**

Movant requests that the Court quash the Notice of Intention to take Oral Deposition, for the reason that Movant's attorney is not available.

**III.**

Pursuant to Rule 191.2 of the Texas Rules of Civil Procedure, efforts to resolve these matters without court intervention were attempted, as evidenced by the Certificate of Conference included herein.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Movant requests that the Court quash the

above-described Notice of Oral Deposition, and for such other and further relief that may be awarded at law or in equity.

Respectfully submitted,

Law Office of Marcos & Associates, P.C.

By: 

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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on September 18, 2018 a true and correct copy of Plaintiff's Motion to Quash Deposition was served upon opposing counsel of record in accordance with Rule 21a of the Texas Rules of Civil Procedure.

  
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Javier Marcos, Jr.

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