

CAUSE NO. 26DCV0903

JONATHAN GARCIA,	§	IN THE DISTRICT COURT
individually,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	CHAMBERS COUNTY,
SOPHIA FILFIL;	§	TEXAS
PROVIDENCE TITLE	§	
COMPANY; and DAMAC	§	
INVESTMENTS, LLC,	§	
Nominal Defendant,	§	
	§	
Defendants.	§	344TH JUDICIAL
		DISTRICT

**PLAINTIFF’S REQUEST FOR RULING ON APPLICATION FOR TEMPORARY
RESTRAINING ORDER, MOTION TO SET TEMPORARY INJUNCTION HEARING
FOR OCTOBER 15, 2026, AND MOTION TO EXTEND ANY TEMPORARY
RESTRAINING ORDER TO THAT DATE**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Jonathan Garcia files this request and motion and respectfully shows:

I. BACKGROUND

1. On September 23, 2026, Plaintiff filed his Verified Original Petition for Declaratory Judgment and Application for Temporary Restraining Order and Temporary Injunction. The application asks the Court to issue, without notice under Texas Rule of Civil Procedure 680, a temporary restraining order that holds the Transaction defined in the petition — the pending contract and escrow at Providence Title Company for the purchase by Damac Investments, LLC of real property in Granbury, Texas — until the Court can decide who controls Damac. No order has yet been signed.

2. On September 25, 2026, the Court's coordinator advised Plaintiff by email that the Court is on vacation and cannot set the application for hearing within fourteen days; that October 2, 2026 is a placeholder setting; that the hearing may be set for October 15, 2026, at 9:00 a.m., when the Court returns, upon Plaintiff's filing for an extension; that all hearings are in person; and that the Court is continuing to sign pleadings. (Exhibit 1.)

II. REQUESTS

3. Ruling on the application for temporary restraining order. Plaintiff respectfully asks the Court to consider his application on the verified petition and its Exhibits A through K and to sign the proposed Temporary Restraining Order submitted with this motion. The facts showing immediate and irreparable injury are stated in Parts VI and VIII of the petition and verified by Plaintiff's declaration: Providence Title Company has not confirmed that it will hold the Transaction, and a closing, funding, disbursement, or assignment made on Defendant Sophia Filfil's instruction could occur at any time and could not be undone. The Court's unavailability for a hearing until October 15, 2026 makes a restraining order in the interim more necessary, not less. The proposed order preserves the status quo only; it transfers nothing to Plaintiff and permits Providence to deposit any funds it holds into the registry of the Court.

4. Setting of the temporary injunction hearing. Plaintiff asks the Court to set his application for temporary injunction for hearing on October 15, 2026, at 9:00 a.m., in the 344th District Court, in person. The proposed Temporary Restraining Order sets the hearing on that date and orders Defendants to appear and show cause why a temporary injunction should not issue.

5. Extension of any temporary restraining order to the hearing date. A temporary restraining order expires by its terms within the time the Court fixes, not to exceed fourteen days, unless within that time the order, for good cause shown, is extended for a like period. Tex. R. Civ. P. 680. Good cause exists here: the Court is not available to hear the application for temporary injunction within fourteen days of any order signed now, and the earliest available setting is October 15, 2026. Plaintiff therefore asks that, if the Court signs a temporary restraining order, the Court extend it once, for a like period of fourteen days, so that it remains in effect through the October 15, 2026 hearing. A proposed Order Extending Temporary

Restraining Order is submitted with this motion, for signature within fourteen days after the restraining order is signed.

6. Alternative request. If the Court prefers not to rule on the application for temporary restraining order on the papers, Plaintiff asks that the Court set that application for hearing at the earliest date and time the Court is available, and set the application for temporary injunction for October 15, 2026, at 9:00 a.m. Plaintiff will appear in person.

III. PRAYER

Plaintiff Jonathan Garcia respectfully prays that the Court (1) sign the proposed Temporary Restraining Order; (2) set Plaintiff's application for temporary injunction for hearing on October 15, 2026, at 9:00 a.m.; (3) extend any temporary restraining order, for good cause, for one additional period of fourteen days so that it remains in effect through that hearing; or, in the alternative, (4) set the application for temporary restraining order for hearing at the Court's earliest availability; and (5) grant Plaintiff all other relief to which he may be justly entitled.

Respectfully submitted,

/s/ Jonathan Garcia

JONATHAN GARCIA, pro se

[REDACTED]
[REDACTED]
[REDACTED]

Jon.garcia.a@gmail.com

CERTIFICATE REGARDING NOTICE

This request is presented in connection with Plaintiff's application for a temporary restraining order without prior notice under Texas Rule of Civil Procedure 680, for the reasons stated in the petition and its Certificate Regarding Notice. Plaintiff will serve this motion, the petition, and any order signed on Defendant Sophia Filfil through her counsel, Alyna Caesar-Ayure, Doré Rothberg Law, [REDACTED] 0, [REDACTED] 4, acaesar-ayure@dorelaw.com, if counsel agrees to accept service, and otherwise as the Texas Rules of Civil Procedure provide; and on Providence Title Company and Damac Investments, LLC through their registered agents, immediately upon any order's signing.

/s/ Jonathan Garcia
Jonathan Garcia

UNSWORN DECLARATION

My name is Jonathan Garcia, my [REDACTED]
[REDACTED]

under penalty of perjury that the facts stated in paragraphs 1 and 2 of this motion are true and correct and within my personal knowledge, and that Exhibit 1 is a true and correct copy of the emails I exchanged with the Court's coordinator on September 24 and 25, 2026, as they appear in my Gmail account. Tex. Civ. Prac. & Rem. Code § 132.001.

Executed in Orange County, State of Florida, on the 25th day of September, 2026.

/s/ Jonathan Garcia

Jonathan Garcia, Declarant

EXHIBIT 1

Emails between Plaintiff and Tonya Hunt, Court Coordinator, 344th District Court — September 24–25, 2026

From: Jon Garcia <jon.garcia.a@gmail.com>
To: Tonya Hunt <thunt@chamberstx.gov>
Date: Thursday, September 24, 2026, 3:57 p.m. CDT
Subject: Cause No. 26DCV0903 — Garcia v. Filfil — Request for TRO Ruling and Temporary Injunction Hearing Setting

[Plaintiff's request that the TRO application be presented to the Court for ruling, that the temporary injunction application be set for hearing within fourteen days of any TRO, and for leave to appear by video; full text preserved.]

From: Tonya Hunt <thunt@chamberstx.gov>
To: Jon Garcia <jon.garcia.a@gmail.com>
Date: Friday, September 25, 2026, 9:04 a.m. CDT
Subject: RE: Cause No. 26DCV0903 — Garcia v. Filfil — Request for TRO Ruling and Temporary Injunction Hearing Setting

"The Judge is on vacation, so I cannot set the case in 14 days. I will temporarily set it for October 2nd, but you will need to file an extension for it to be set October 15th at 9:00 a.m. when he returns. All hearings are in person."

From: Jon Garcia <jon.garcia.a@gmail.com>
To: Tonya Hunt <thunt@chamberstx.gov>
Date: Friday, September 25, 2026, 9:29 a.m. CDT
Subject: RE: Cause No. 26DCV0903 — Garcia v. Filfil — Request for TRO Ruling and Temporary Injunction Hearing Setting

[Plaintiff's questions whether the TRO application may be presented to another available judge, what form the extension should take, and whether the October 2 setting is a hearing; full text preserved.]

From: Tonya Hunt <thunt@chamberstx.gov>
To: Jon Garcia <jon.garcia.a@gmail.com>
Date: Friday, September 25, 2026, 9:34 a.m. CDT
Subject: RE: Cause No. 26DCV0903 — Garcia v. Filfil — Request for TRO Ruling and Temporary Injunction Hearing Setting

"Judge McDonald is still signing pleadings on vacation. We do not have a form and you will need to research and figure out what to file. The October 2nd date is just a placeholder."

Transcribed from the Gmail account of Jonathan Garcia (jon.garcia.a@gmail.com). Times shown in U.S. Central time. Signature-block images and confidentiality notices omitted. The original messages, with full headers, are preserved and available on request.