

CAUSE NO. 2026-70357

622 SOFI LAKES, LP,	§	IN THE DISTRICT COURT OF
GO-M REALTY LLC, and	§	
DAMAC INVESTMENTS LLC,	§	
Plaintiffs/Counter-Defendants,	§	
	§	
v.	§	
	§	
JONATHAN GARCIA,	§	
Defendant/Counter-Plaintiff/	§	
Third-Party Plaintiff,	§	HARRIS COUNTY, TEXAS
	§	
v.	§	
	§	
SOPHIA FILFIL, et al.,	§	
including YAALX REALTY GROUP,	§	
LLC,	§	
ZACHARY PETERS, KEVIN VADER,	§	
TEXAS TOP REALTY, LLC d/b/a	§	
CENTURY 21 TOP REALTY, and	§	
PROVIDENCE TITLE COMPANY,	§	515TH JUDICIAL DISTRICT
Third-Party Defendants.		

**JONATHAN GARCIA’S VERIFIED EMERGENCY APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION TO
PRESERVE THE GRANBURY ESCROWS**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Counter-Plaintiff, and Third-Party Plaintiff Jonathan Garcia (“Garcia”), appearing pro se, applies for a temporary restraining order and, after hearing, a temporary injunction preserving the status quo of Damac Investments, LLC’s (“Damac”) purchase of land in Granbury, Texas — and of any resale or assignment of it — until this Court decides who may act for Damac. In support, Garcia shows:

I. WHY THIS IS AN EMERGENCY

1. On October 2, 2026, the 344th District Court of Chambers County abated Garcia’s suit concerning Damac (No. 26DCV0903) in deference to this case and vacated the temporary

restraining order that had protected the Granbury escrow. (Exhibit A.) That court found the two suits “inherently interrelated” and that this Court has dominant jurisdiction over who controls Damac. As a result, no order now protects the Granbury escrow. Yet Plaintiffs in this case expressly disclaimed any claim relating to the Granbury purchase contract. (Pls.’ Pet. ¶¶ 9, 49.) Ms. Filfil has written that the transaction will close “end of October.” (Answer Exh. 17; Exhibit B.) Unless this Court acts, the escrow can be closed, assigned, or disbursed on Ms. Filfil’s instruction before any court decides whether she has authority to give it.

II. FACTS

2. Garcia was added as a member of Damac by Certificate of Amendment filed with the Texas Secretary of State on April 1, 2025, the same day he signed the Granbury purchase documents for Damac as its Member and Ms. Filfil wrote to the brokers and the title company, “Please have your buyer Jonathan sign this asap.” (Exhibit F; Answer Exhs. 5, 6, 25.)

3. Ms. Filfil introduced Garcia to the seller’s family — Dr. Malladi Reddy and his son, Ashoke Reddy — as the buyer representing Damac. In December 2024 she arranged a call with Dr. Reddy and told Garcia, “you are builder relation authorized person,” and identified the purchasing company as “Damac investments.” On March 31, 2025 she sent Garcia Ashoke Reddy’s contact information and asked Garcia to call him with her; on April 1, 2025 Garcia texted Ashoke Reddy, and she coached him on how to present himself to the seller’s family as Damac’s side of the deal: “Be the king,” “You are capital investment person,” “You work with family officers,” “To get project funding,” and “You can send this to Ashoke, funding source.” (Exhibit D.) Ms. Filfil’s position now — that Garcia is not part of Damac — cannot be squared with her own presentation of him to the seller as Damac’s buyer representative.

4. Exhibit E, a one-page summary of record evidence under Texas Rule of Evidence 1006, connects these facts. On a single day — April 1, 2025 — Ms. Filfil had her broker obtain Garcia’s signature as Damac’s “Member,” told the brokers and the title company to “have your buyer Jonathan sign,” the Secretary of State filing listing “Member: JONATHAN GARCIA” was made, and she set up a Damac email account in his name, and coached him on presenting himself to the seller’s son as Damac’s funding side. She called him “my partner in this project” in November 2025, fraudulently removed him without his signature on December 15, 2025, and the

same day asked him to sign \$500,000 in Granbury documents. Her present position that he was never part of Damac cannot be reconciled with her own conduct. (Exhibits D, E.)

5. On December 15, 2025, a certificate of amendment that no member signed fraudulently purported to remove Garcia and the deceased member Nick Herman and added Ms. Filfil. (Answer Exh. 2.) Amending a limited liability company's certificate of formation requires the vote of all members. Tex. Bus. Orgs. Code § 101.356(d). Garcia did not vote for it. (Exhibit G.) The same day, Ms. Filfil texted him, "Connor will be sending documents for u to sign for 500k ... For Granbury." (Answer Exh. 26.)

6. The Granbury transaction has two escrows: (a) Damac's purchase from the Reddy family at Providence Title Company, GF No. 13100025 (the "Purchase Escrow"); and (b) a resale of the property, or assignment of Damac's rights, to a downstream buyer (the "Resale Escrow"). Ms. Filfil described the resale in writing — "My buyer will close in August or September," "we are making only little about 30 million," "Data center" — and told Garcia that "All contracts are moved to bilateral energy." (Answer Exhs. 7, 26, 27.) Garcia does not know where the Resale Escrow is held.

7. The brokers on both sides were tied to Ms. Filfil: her brokerage, Yaalx Realty Group, LLC, and its broker, Zachary Peters, worked with the seller; the buyer's broker, Kevin Vader of CENTURY 21 Top Realty, was her business partner and acknowledged in writing her and Mr. Peters' "client relationship" with the seller. (Answer Exhs. 25, 26.)

8. On September 21, 2026, Providence's escrow officer wrote that "Sophia Filfil is the managing member and operating officer of the company" and that Providence would disclose nothing further. (Exhibit C.) Providence is therefore acting on Ms. Filfil's claimed authority — the very question before this Court.

II-A. MS. FILFIL'S CLAIMED AUTHORITY CONTRADICTS THE PUBLIC RECORD AND HER OWN WORDS

Ms. Filfil's only basis for controlling Damac — and therefore for directing the Granbury escrows — is a "Company Agreement" she first produced on September 29, 2026. (Exhibit J.) It cannot be reconciled with the State's records, with her own filings, or with what she told the seller, the brokers, and the title company:

(a) The agreement is dated October 21, 2022 and lists Ms. Filfil as Damac’s 100% member. If that were so, there would have been no need, on December 15, 2025, to file a certificate of amendment adding “Sophia Filfil, Title: Member.” (Exhibits G, J.)

(b) The agreement ignores the April 1, 2025 certificate of amendment adding “Member: JONATHAN GARCIA.” (Exhibit F.)

(c) The December 15, 2025 amendment that fraudulently purported to remove Garcia was signed by no member of Damac; it was executed by the registered agent as “authorized person,” and certifies approval “in the manner required by the Texas Business Organizations Code” — which requires the vote of all members, including Garcia. Tex. Bus. Orgs. Code § 101.356(d). Garcia never voted for it. (Exhibit G.)

(d) Damac’s Texas Franchise Tax Public Information Report filed March 5, 2026 names Ms. Filfil as “Manager” and lists Nick Herman as a current “Member.” Mr. Herman died on May 30, 2025. The agreement lists no member but Ms. Filfil. (Exhibits H, I, J.)

(e) In this Court her companies plead that she is Damac’s “sole member”; in Chambers County she called herself Damac’s “only Manager of record”; and the agreement names “Beneficial Trust c/o Sophia Filfil” as manager and is signed by her only as “Chief Operating Officer,” an office the agreement does not create. (Pls.’ Pet.; Exhibit J.)

(f) She told the brokers and the title company to “have your buyer Jonathan sign,” presented Garcia to the seller’s family as Damac’s buyer representative, and called him “my partner in this project.” (Exhibits D, E.)

(g) Garcia never saw, signed, or received the agreement before it was filed on September 29, 2026 — after a court had restrained her from acting for Damac.

A document with these contradictions should not be the basis for releasing the Granbury escrows on her instruction before this Court decides who Damac’s members are.

III. GROUNDS FOR INJUNCTIVE RELIEF

9. An applicant must plead and prove a cause of action, a probable right to the relief sought, and a probable, imminent, and irreparable injury in the interim. *Butnaru v. Ford Motor*

Co., 84 S.W.3d 198, 204 (Tex. 2002). The purpose of a temporary injunction is to preserve the status quo pending trial. Id.

10. *Cause of action.* Garcia’s live counterclaims and third-party claims include a declaratory judgment that he is a member of Damac and that the December 15, 2025 amendment is void as to him, breach of fiduciary duty and knowing participation, statutory fraud under Tex. Bus. & Com. Code § 27.01, an accounting, and a constructive trust over the proceeds of the Granbury transaction.

11. *Probable right to relief.* The State’s records show Garcia was admitted as a member on April 1, 2025; the amendment removing him required his vote and was signed by no member; and Ms. Filfil’s only document for her claimed authority — a “Company Agreement” dated 2022 and first produced on September 29, 2026 — contradicts the State’s records and her own positions in at least seven ways. (Part II-A; Exhibits F–J.)

12. *Imminent, irreparable injury.* The transaction concerns real property, which is unique. If either escrow is closed, funded, assigned, or disbursed, or commissions are paid out, it cannot be undone, and the property or Damac’s rights in it may pass to a third party. Ms. Filfil has said closing is set for the end of October, and the only order that protected the escrow was vacated on October 2, 2026.

13. *Status quo.* The status quo is the last peaceable, uncontested status — before the December 15, 2025 amendment. The relief sought transfers nothing to Garcia; it holds everything in place until the Court decides who may act for Damac.

IV. RELIEF REQUESTED

Garcia asks the Court to issue a temporary restraining order and, after hearing, a temporary injunction providing that:

(a) Sophia Filfil, individually and as Trustee, and Plaintiffs 622 Sofi Lakes, LP, GO-M Realty LLC, and Damac Investments LLC, and their agents and all persons in active concert with them who receive actual notice, are restrained from closing, funding, assigning, amending, terminating, or otherwise transferring Damac’s rights in the

Granbury property or its purchase contract, and from instructing any title or escrow company to close, fund, or disburse the Purchase Escrow or any Resale Escrow;

(b) Providence Title Company is restrained from closing, funding, disbursing any earnest money or other funds, or accepting any assignment, amendment, or substitution of buyer in the Purchase Escrow (GF No. 13100025) or any other escrow for the Granbury property, on the instruction of Ms. Filfil or any person claiming authority through the December 15, 2025 certificate of amendment, pending further order; provided that Providence may deposit any funds it holds into the registry of the Court;

(b-1) Provided, however, that the purchase and any resale of the Granbury property may close if, at closing, all net proceeds, profits, fees, and commissions payable to or for the benefit of Damac, Ms. Filfil, any entity she owns or controls, Yaalx Realty Group, LLC, Zachary Peters, Kevin Vader, or Texas Top Realty, LLC are deposited into the registry of the Court or held by the closing escrow agent pending further order, and Garcia and the Court receive written notice of the closing at least five days in advance. This proviso lets the transaction proceed while preserving the money in dispute.

(c) Yaalx Realty Group, LLC, Zachary Peters, Kevin Vader, and Texas Top Realty, LLC d/b/a CENTURY 21 Top Realty are restrained from transmitting or acting on Ms. Filfil's instructions for Damac, from preparing, delivering, or facilitating any assignment, amendment, resale, or closing of the Granbury transaction, and from receiving or disbursing any commission from it — any commission received to be held in trust or deposited into the registry of the Court;

(d) within five days, Providence Title Company shall file and serve a sworn statement identifying every buyer, assignee, or other party to any contract to purchase, resell, or assign the Granbury property or Damac's rights in it of which it has knowledge; the title company or escrow agent and escrow number for each; the escrows it holds for the property, whether each is open, and the funds held; any scheduled closing date; and the persons from whom it has accepted instructions for Damac since December 15, 2025; and

(e) all parties shall preserve all documents relating to Damac, the Granbury property, and both escrows.

Receiver. If the Court does not grant the restraints in Part IV, or if any person attempts to act for Damac in the Granbury transaction, Garcia reserves the right to apply for the appointment of a neutral temporary receiver for Damac at Ms. Filfil's expense. Tex. Civ. Prac. & Rem. Code § 64.001; Tex. Bus. Orgs. Code § 11.404.

Bond. The order preserves the status quo; funds remain in escrow or in the registry of the Court. Garcia asks that bond be set at \$100. Tex. R. Civ. P. 684.

Garcia asks that the temporary-injunction hearing be set at the earliest available date, together with Plaintiffs' pending application for temporary injunction, and that the temporary injunction remain in effect until final judgment or further order of the Court.

V. PRAYER

Garcia respectfully asks the Court to grant the temporary restraining order requested in Part IV, set his application for temporary injunction for hearing, grant the temporary injunction after hearing, to remain in effect until final judgment or further order of the Court, and grant all other relief to which he is entitled.

Respectfully submitted,

/s/ Jonathan Garcia

JONATHAN GARCIA, pro se

[REDACTED]

[REDACTED]

Tel. [REDACTED]

Jon.garcia.a@gmail.com

DEFENDANT/COUNTER-PLAINTIFF/

THIRD-PARTY PLAINTIFF

VERIFICATION — UNSWORN DECLARATION

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

under penalty of perjury that the facts stated in paragraphs 1 through 8 and in Part II-A of this application are within my personal knowledge or are shown by the documents cited, and are true and correct. Exhibit A is a true and correct copy of the Order signed October 2, 2026 in Cause No. 26DCV0903, as emailed to me by the Chambers County District Clerk. Exhibits B and D are true and correct reproductions of iMessages between Sophia Filfil and me, exported from my iPhone using iMazing; the text of each message is verbatim. Exhibit C is a true and correct copy of an email I received from Providence Title Company on September 21, 2026. Exhibit E is a summary I prepared of evidence in the record; each entry is cited to an exhibit and each quotation is verbatim. Exhibits F, G, and H are true and correct copies of records of the Texas Secretary of State and Texas Comptroller for Damac Investments, LLC. Exhibit I is a true and correct copy of Nick Herman's published obituary. Exhibit J contains true and correct copies of pages of the "Operating Agreement" Ms. Filfil filed in Cause No. 26DCV0903 on September 29, 2026. Tex. Civ. Prac. & Rem. Code § 132.001.

Executed in Orange County, State of Florida, on the 5th day of October, 2026.

/s/ Jonathan Garcia

Jonathan Garcia, Declarant

CERTIFICATE OF CONFERENCE

Because of the emergency — no order presently protects the Granbury escrow — Garcia could not complete a conference before filing. On October 5, 2026, Garcia emailed this application to counsel for Plaintiffs and Ms. Filfil, Connor J. Smith, and to Providence Title Company, and will advise the Court of their positions on request.

CERTIFICATE OF SERVICE

I certify that on October 5, 2026, a true and correct copy of this application was served under Texas Rule of Civil Procedure 21a on Connor J. Smith, Doré Rothberg Law, P.C., csmith@dorelaw.com, counsel for Plaintiffs and Sophia Filfil, through the electronic filing

manager and by email, and on Providence Title Company by email to Noel D. Wasson, nwasson@protitletx.com. Third-party defendants not yet served will be served with citation.

/s/ Jonathan Garcia
Jonathan Garcia

INDEX OF EXHIBITS

Exhibit A — Order Modifying Plea in Abatement, signed October 2, 2026, Cause No. 26DCV0903 (abating the Chambers case and vacating its TRO)

Exhibit B — iMessages of August 30, 2026 (“Granbury closing end of October”)

Exhibit C — Email of September 21, 2026 from Noel D. Wasson, Providence Title Company

Exhibit D — iMessages: Ms. Filfil presents Garcia to Dr. Reddy and Ashoke Reddy as Damac’s buyer representative

Exhibit E — Summary (Tex. R. Evid. 1006): Connecting the record — Garcia as Damac’s buyer

Exhibit F — Texas SOS Certificate of Amendment, filed April 1, 2025 (“Member: JONATHAN GARCIA”)

Exhibit G — Texas SOS Certificate of Amendment, filed December 15, 2025 (signed by no member)

Exhibit H — Texas Franchise Tax Public Information Report, filed March 5, 2026

Exhibit I — Obituary of Nicholas Ballard Herman (died May 30, 2025)

Exhibit J — Excerpts of Ms. Filfil’s “Operating Agreement of DAMAC Investments, LLC”

Garcia also relies on Exhibits 1–37 to his Original Answer, Counterclaims, and Third-Party Petition, filed with this application.

EXHIBIT A

Order Modifying Defendant Sophia Filfil's Plea in Abatement
Cause No. 26DCV0903, 344th District Court, Chambers County
Signed October 2, 2026; filed 5:13 p.m.

Cause No. 26DCV0903

**JONATHAN GARCIA, individually,
Plaintiff,**

v.

**SOPHIA FILFIL; PROVIDENCE TITLE
COMPANY; and DAMAC
INVESTMENTS,
LLC, Nominal Defendant,
Defendants.**

§
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IN THE DISTRICT COURT OF

CHAMBERS COUNTY, TEXAS

344th JUDICIAL DISTRICT

ORDER MODIFYING DEFENDANT SOPHIA FILFIL’S PLEA IN ABATEMENT

On this day the Court considered Defendant Sophia Filfil’s *Motion to Transfer Venue and, Subject Thereto, Plea in Abatement* (“Venue Motion”), Plaintiff’s *Emergency Motion to Reconsider and Vacate the Order of October 1, 2026*, and Defendant’s *Response* to that motion. This Order modifies and supersedes the Order signed October 1, 2026.

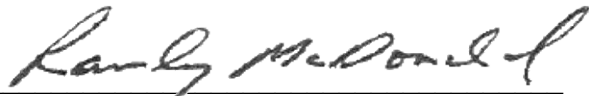
The Court finds that Cause No. 2026-70357, styled *622 SOFI Lakes, LP, GO-M Realty LLC, and Damac Investments LLC v. Jonathan Garcia*, was filed in the 515th Judicial District Court of Harris County, Texas on September 22, 2026, before this action was filed on September 23, 2026; that the two actions are inherently interrelated; and that the Harris County court acquired dominant jurisdiction.

IT IS THEREFORE ORDERED that this action is ABATED pending final disposition of Cause No. 2026-70357 in the 515th Judicial District Court of Harris County, Texas. The District Clerk shall not transmit the record.

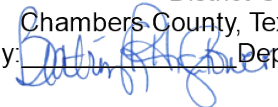
IT IS FURTHER ORDERED that all proceedings in this cause, including Defendant Sophia Filfil’s Venue Motion, are suspended during the abatement, including the temporary injunction setting of October 15, 2026, until the abatement is lifted on motion of a party and order of this Court.

IT IS FURTHER ORDERED that the Temporary Restraining Order signed September 25, 2026, and any order extending, modifying, or replacing it, is VACATED.

SIGNED this _____, October 2, 2026, ~~2026~~



JUDGE RANDY MCDONALD

Filed
10/02/2026 5:13:41 PM
Patti L. Henry
District Clerk
Chambers County, Texas
By:  Deputy

Approved as to Form, and Entry Requested:

DORÉ ROTHBERG LAW, P.C.

By: /s/ Connor J. Smith
Connor J. Smith
State Bar No. 24109205



one
Facsimile
FOR DEFENDANT

SOPHIA FILFIL

EXHIBIT B

iMessages of August 30, 2026 — “Granbury closing end of October”
Sophia Filfil ([REDACTED]) and Jonathan Garcia

Text is reproduced verbatim from the iMazing export of the iMessage conversation “Sophia Hotel,” arranged in iMessage layout. Gray bubbles are messages from Ms. Filfil; blue bubbles are messages from Mr. Garcia.



Sophia Hotel (Sophia Filfil)
iMessage · [REDACTED]

Just give me graberry

Garcia · 8/30/26 8:39 AM EDT · Export p. 2893

Granbury closing end of October

Filfil · 8/30/26 8:39 AM EDT · Export p. 2893

U will get ur money

Filfil · 8/30/26 8:39 AM EDT · Export p. 2893

EXHIBIT C

Email of September 21, 2026 — Noel D. Wasson, Providence Title Company, to Jonathan Garcia

Reproduced from Jonathan Garcia's email account (jon.garcia.a@gmail.com). Text is verbatim; logos, security banners, and the quoted original message are omitted. Highlighting added by Mr. Garcia. Attachments listed in the message: "4-7-25 - TX - Initial Filing - DAMAC INVESTMENTS LLC.pdf"; "Certificate of Amendment_DAMAC.pdf."

From: Noel D. Wasson <nwasson@protitltx.com>
Date: Sep 21, 2026
To: jon.garcia.a@gmail.com
Subject: RE: GF No. 13100025 — Damac Investments, LLC — STOP INSTRUCTION — Do Not Close / Hold All Funds — [REDACTED] Granbury — CONFIDENTIAL

Hi Mr. Garcia,

I have received your email, but I do not have any documentation that you are a member of this company. I cannot disclose any information regarding any transaction that you are not a party to. I have attached the public filing from the SOS website where you were added as a member in April 2025, but you were not added as the sole member, as Sophia Filfil is the managing member and operating officer of the company. I have also attached the SOS filing where you were removing as a member in December of 2025.

I am not authorized to disclose any further information about this entity or this transaction. If you have state documentation for this entity, please provide that information to me as to clarify your role or involvement with this company.

Regards,

Noel Wasson

Team Leader/Escrow Officer

EXHIBIT D

Ms. Filfil presents Garcia to the seller's family as Damac's buyer representative
iMessages between Sophia Filfil and Jonathan Garcia

Text is reproduced verbatim from the iMazing export of the iMessage conversation "Sophia Hotel," arranged in iMessage layout. Gray bubbles are messages from Ms. Filfil; blue bubbles are messages from Mr. Garcia. Ms. Filfil's message of March 31, 2025 shared the contact "Ashoke Reddy" (telephone number redacted). Section headings were added by Mr. Garcia.

SF

Sophia Hotel (Sophia Filfil)
iMessage · [REDACTED]

December 4–6, 2024 — Dr. Reddy

Jonathan@damacinvestments.com

Filfil · 12/4/24 8:12 PM EST · Export p. 1403

Dr reddy signed the contract

Filfil · 12/5/24 9:34 PM EST · Export p. 1405

Black

Filfil · 12/5/24 9:51 PM EST · Export p. 1406

We will call dr reddy tomorrow -3 way call

Filfil · 12/5/24 9:56 PM EST · Export p. 1406

Dr reddy call you are builder relation authorized person Just let him know You will be working on feasibilities that sophia provided and those not done Engineering company will take care off Right now you will be closing end of April but if any extension needed due to issues you will let sophia Filfil know. We like the property Becasue there is what availability Let him know you know the price Dr reddy bought at it's a public record. Issue that u see is power-line And lots of rocks Cost to removal will be high . Make it short and simple.

Filfil · 12/6/24 10:45 AM EST · Export p. 1407

And the name Of the purchasing company ?

Garcia · 12/6/24 12:35 PM EST · Export p. 1407

I represent

Garcia · 12/6/24 12:35 PM EST · Export p. 1407

Damac investments

Filfil · 12/6/24 12:37 PM EST · Export p. 1407

March 30–31, 2025 — Ashoke Reddy (Dr. Reddy's son); Damac company information

I need you to call Ashoke with me tomorrow

Filfil · 3/30/25 9:58 PM EDT · Export p. 1568

Ok

Garcia · 3/30/25 10:00 PM EDT · Export p. 1568

I will explain what to say

Filfil · 3/30/25 10:00 PM EDT · Export p. 1568

Your broker is Kevin Vader

Filfil · 3/31/25 11:10 AM EDT · Export p. 1569

Ashoke Reddy iMessage

Filfil · 3/31/25 11:26 AM EDT · Export p. 1570

[telephone number redacted]

Filfil · 3/31/25 11:26 AM EDT · Export p. 1570

 DAMAC INVESTMENTS LLC in Austin, TX Company Info & Reviews. jpeg (Image)
[attachment file name; file not in export]

Garcia · 3/31/25 12:15 PM EDT · Export p. 1570

Change it to your name

Filfil · 3/31/25 1:23 PM EDT · Export p. 1570

Ok

Garcia · 3/31/25 1:26 PM EDT · Export p. 1570

April 1, 2025

Google workspace Email ID user created Username: jonathan@damacinvestments.us
passsword: Sophiafilfil123

Filfil · 4/1/25 7:16 AM EDT · Export p. 1575

I sent Reddy son an text message

Garcia · 4/1/25 12:23 PM EDT · Export p. 1575

Said lets up video

Garcia · 4/1/25 12:24 PM EDT · Export p. 1575

Call

Garcia · 4/1/25 12:24 PM EDT · Export p. 1575

With Ashoke

Filfil · 4/1/25 1:12 PM EDT · Export p. 1576

No. He hasn't communicated

Garcia · 4/1/25 1:15 PM EDT · Export p. 1576

Probably Dont tell him about u mortgage broker

Filfil · 4/1/25 1:19 PM EDT · Export p. 1576

Be the king

Filfil · 4/1/25 1:19 PM EDT · Export p. 1576

You are capital investment person

Filfil · 4/1/25 1:23 PM EDT · Export p. 1576

You work with family officers

Filfil · 4/1/25 1:23 PM EDT · Export p. 1576

To get project funding

Filfil · 4/1/25 1:24 PM EDT · Export p. 1576

You can send this to Ashoke ,funding source

Filfil · 4/1/25 7:37 PM EDT · Export p. 1578

Via email Text message

Filfil · 4/1/25 7:37 PM EDT · Export p. 1578

April 8, 2025

Reply to Ashoke, told him i dont have your number Text message

Filfil · 4/8/25 1:28 PM EDT · Export p. 1618

EXHIBIT E

Connecting the record: Ms. Filfil presented Jonathan Garcia as Damac's buyer — to the seller, the brokers, and the title company

Demonstrative summary prepared by Mr. Garcia under Texas Rule of Evidence 1006. Every entry is drawn from an exhibit already in the record, cited in brackets ("Ans." = Exhibits to Garcia's Answer, Counterclaims and Third-Party Petition; letters = Exhibits to this application). Quotations are verbatim.



- **Dec. 4–6, 2024** — Filfil sends Garcia “Jonathan@damacinvestments.com”; names the buyer “Damac investments”; before a call with the seller tells Garcia “Dr reddy call you are builder relation authorized person”. [D]
- **Mar. 30–31, 2025** — Filfil: “I need you to call Ashoke with me”; sends Garcia Ashoke Reddy's contact; tells Garcia “Your broker is Kevin Vader”; after Garcia sends Damac's company information: “Change it to your name”. [D; Ans. 26]
- **Mar. 31, 2025** — Buyer's broker Vader writes to Ashoke Reddy, copying Peters and Filfil, to communicate through “Sophia and Zach” and “be respectful of their client relationship with you”; attachments include “Exec Intent Letter – Damac”. Filfil forwards to Garcia: “FYI”. [Ans. 25]
- **Apr. 1, 2025 — the same day**
 - Peters (Yaalx) sends Garcia the Damac form; Garcia: “Title should be Member or Manager. Ask Sophia” ... “Put Member”; signed form returned to Peters **and Filfil**. [Ans. 25]
 - Filfil to Vader, Peters and Providence's escrow officer: “Please have your buyer Jonathan sign this asap”; Garcia signs the contract amendment for “Damac Investments &/or Assigns”. [Ans. 5, 6]
 - Texas SOS Certificate of Amendment filed: “Member: JONATHAN GARCIA”. [Ans. 1]
 - Filfil: “Google workspace Email ID user created Username: jonathan@damacinvestments.us”, with a password based on her own name. [D]
 - Garcia texts Ashoke Reddy; Filfil coaches him for the seller's family: “Be the king” · “You are capital investment person” · “You work with family officers” · “To get project funding” · “You can send this to Ashoke, funding source”. [D]
- **Apr. 2 & 8, 2025** — Filfil: “we are making only little about 30 million” ... “Data center”; “Reply to Ashoke, told him i dont have your number”. [D; Ans. 26]
- **Nov. 25, 2025** — Filfil, in writing to the project team: “Jon Garcia, is my partner in this project”. [Ans. 7]
- **Dec. 15, 2025** — Amendment signed by no member removes Garcia and adds Filfil. **Same day** Filfil texts: “Connor will be sending documents for u to sign for 500k ... For Granbury”. [Ans. 2, 26]
- **Dec. 18, 2025** — Peters still sends Garcia a Granbury contract amendment to sign as buyer (Garcia did not open or sign it). [Ans. 25]
- **Sept. 21, 2026** — Providence: “Sophia Filfil is the managing member and operating officer”. [C]
- **Sept. 22, 2026** → — Filfil's companies sue Garcia, claiming he is not part of Damac. [Pls.' Pet.]

The dots connect: Ms. Filfil (1) told the seller's family, through her own words and her broker partner, that Garcia was Damac's buyer; (2) had Garcia sign as Damac's Member and buyer; (3) his membership was filed with the State the same day; (4) fraudulently removed him without his signature while still asking him to sign for Granbury; and (5) now denies he was ever part of Damac. The escrow should not be released on her word until the Court decides who Damac's members are.

EXHIBIT F

Certificate of Amendment, Damac Investments, LLC

Filed with the Texas Secretary of State April 1, 2025 (Document No. 1465837290002)

**Form 424
(Revised 05/11)**

Submit in duplicate to:
Secretary of State
P.O. Box 13697
[REDACTED]

FAX: 512/463-5709

Filing Fee: See instructions



This space reserved for office use.

Certificate of Amendment

Entity Information

The name of the filing entity is:

DAMAC INVESTMENTS LLC

State the name of the entity as currently shown in the records of the secretary of state. If the amendment changes the name of the entity, state the old name and not the new name.

The filing entity is a: (Select the appropriate entity type below.)

- | | |
|---|---|
| ☐ For-profit Corporation | ☐ Professional Corporation |
| ☐ Nonprofit Corporation | ☐ Professional Limited Liability Company |
| ☐ Cooperative Association | ☐ Professional Association |
| ☒ Limited Liability Company | ☐ Limited Partnership |

The file number issued to the filing entity by the secretary of state is: 804779451

The date of formation of the entity is: October 21, 2022

Amendments

1. Amended Name

(If the purpose of the certificate of amendment is to change the name of the entity, use the following statement)

The amendment changes the certificate of formation to change the article or provision that names the filing entity. The article or provision is amended to read as follows:

The name of the filing entity is: (state the new name of the entity below)

The name of the entity must contain an organizational designation or accepted abbreviation of such term, as applicable.

2. Amended Registered Agent/Registered Office

The amendment changes the certificate of formation to change the article or provision stating the name of the registered agent and the registered office address of the filing entity. The article or provision is amended to read as follows:

Registered Agent
(Complete either A or B, but not both. Also complete C.)

☐ A. The registered agent is an organization (cannot be entity named above) by the name of:

OR

☐ B. The registered agent is an individual resident of the state whose name is:

First Name

M.I.

Last Name

Suffix

The person executing this instrument affirms that the person designated as the new registered agent has consented to serve as registered agent.

C. The business address of the registered agent and the registered office address is:

Street Address (No P.O. Box)

City

TX

State Zip Code

3. Other Added, Altered, or Deleted Provisions

Other changes or additions to the certificate of formation may be made in the space provided below. If the space provided is insufficient, incorporate the additional text by providing an attachment to this form. Please read the instructions to this form for further information on format.

Text Area (The attached addendum, if any, is incorporated herein by reference.)

☒ **Add** each of the following provisions to the certificate of formation. The identification or reference of the added provision and the full text are as follows:

Member: JONATHAN GARCIA [REDACTED] Suite 700 Houston, Texas 77084

☐ **Alter** each of the following provisions of the certificate of formation. The identification or reference of the altered provision and the full text of the provision as amended are as follows:

☐ **Delete** each of the provisions identified below from the certificate of formation.

Statement of Approval

The amendments to the certificate of formation have been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing (Select either A, B, or C.)

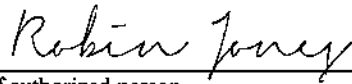
- A. ☒ This document becomes effective when the document is filed by the secretary of state.
- B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. ☐ This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is: _____
- The following event or fact will cause the document to take effect in the manner described below:

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: 04/01/2025

By: Registered Agents Inc.


Signature of authorized person

Authorized Representative - Robin Jones on behalf of Registered Agents Inc.

Printed or typed name of authorized person (see instructions)

Print

Reset

EXHIBIT G

Certificate of Amendment, Damac Investments, LLC

Filed with the Texas Secretary of State December 15, 2025 (Document No. 1542200210003)

**Form 424
(Revised 05/11)**

Submit in duplicate to:
Secretary of State
P.O. Box 13697
[REDACTED]

FAX: 512/463-5709

Filing Fee: See instructions



This space reserved for office use.

Certificate of Amendment

Entity Information

The name of the filing entity is:

DAMAC INVESTMENTS LLC

State the name of the entity as currently shown in the records of the secretary of state. If the amendment changes the name of the entity, state the old name and not the new name.

The filing entity is a: (Select the appropriate entity type below.)

☐ For-profit Corporation

☐ Professional Corporation

☐ Nonprofit Corporation

☐ Professional Limited Liability Company

☐ Cooperative Association

☐ Professional Association

☒ Limited Liability Company

☐ Limited Partnership

The file number issued to the filing entity by the secretary of state is: 804779451

The date of formation of the entity is: 10/21/2022

Amendments

1. Amended Name

(If the purpose of the certificate of amendment is to change the name of the entity, use the following statement)

The amendment changes the certificate of formation to change the article or provision that names the filing entity. The article or provision is amended to read as follows:

The name of the filing entity is: (state the new name of the entity below)

The name of the entity must contain an organizational designation or accepted abbreviation of such term, as applicable.

2. Amended Registered Agent/Registered Office

The amendment changes the certificate of formation to change the article or provision stating the name of the registered agent and the registered office address of the filing entity. The article or provision is amended to read as follows:

Registered Agent
(Complete either A or B, but not both. Also complete C.)

☐ A. The registered agent is an organization (cannot be entity named above) by the name of:

OR

☐ B. The registered agent is an individual resident of the state whose name is:

First Name	M.I.	Last Name	Suffix
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The person executing this instrument affirms that the person designated as the new registered agent has consented to serve as registered agent.

C. The business address of the registered agent and the registered office address is:

Street Address (No P.O. Box)	City	TX	State Zip Code
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3. Other Added, Altered, or Deleted Provisions

Other changes or additions to the certificate of formation may be made in the space provided below. If the space provided is insufficient, incorporate the additional text by providing an attachment to this form. Please read the instructions to this form for further information on format.

Text Area (The attached addendum, if any, is incorporated herein by reference.)

☒ **Add** each of the following provisions to the certificate of formation. The identification or reference of the added provision and the full text are as follows:

Sophia Filfil

Title: Member

Address: 5900 BALCONES DRIVE STE 100

☐ **Alter** each of the following provisions of the certificate of formation. The identification or reference of the altered provision and the full text of the provision as amended are as follows:

☒ **Delete** each of the provisions identified below from the certificate of formation.

Nick Herman

&

Jonathan Garcia

Statement of Approval

The amendments to the certificate of formation have been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing (Select either A, B, or C.)

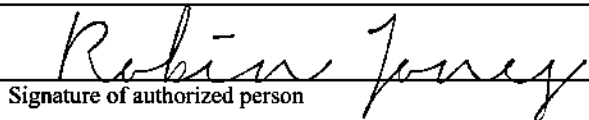
- A. ☒ This document becomes effective when the document is filed by the secretary of state.
- B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. ☐ This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is: _____
- The following event or fact will cause the document to take effect in the manner described below:

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: 12/15/2025

By: Registered Agents Inc.


Signature of authorized person

Authorized Representative - Robin Jones on behalf of Registered Agents Inc.

Printed or typed name of authorized person (see instructions)

Print

Reset

EXHIBIT H

Texas Franchise Tax Public Information Report, Damac Investments, LLC

Filed March 5, 2026 (Document No. 1604392840001)



Comptroller of Public Accounts
FORM 05-102
(Rev. 9-11/30)

Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC) and Financial Institutions

This report **MUST** be signed and filed to satisfy franchise tax requirements

■ Tcode 13196 Franchise

■ Taxpayer number

3 2 0 8 6 8 5 8 1 0 0

■ Report year

2 0 2 6

You have certain rights under Chapter 552 and 559, Government Code, to review, request, and correct information we have on file about you.

Taxpayer name

DAMAC INVESTMENTS LLC

Mailing address

5900 BALCONES DR STE 100

Secretary of State (SOS) file number or
Comptroller file number

City

AUSTIN

State

TX

ZIP Code

78731

Plus 4

0804779451

○ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office

Principal place of business

Please sign below!

Officer, director and manager information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers, directors, or managers change throughout the year.



3208685810026

SECTION A Name, title and mailing address of each officer, director or manager.

Name SOPHIA FILFIL	Title MANAGER	Director ☐ YES	Term expiration m m d d y y
Mailing address 5900 BALCONES DRIVE, STE 100	City AUSTIN	State TX	ZIP Code 78731
Name nick herman	Title Member	Director ☐ YES	Term expiration m m d d y y
Mailing address 5900 BALCONES DRIVE STE 100	City AUSTIN	State TX	ZIP Code 78731
Name	Title	Director ☐ YES	Term expiration m m d d y y
Mailing address	City	State	ZIP Code

SECTION B Enter the information required for each corporation or LLC, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership

SECTION C Enter the information required for each corporation or LLC, if any, that owns an interest of 10 percent or more in this entity or limited liability company.

Name of owned (parent) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership
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Registered agent and registered office currently on file. (see instructions if you need to make changes)

Agent: **REGISTERED AGENTS INC.**

○ Blacken circle if you need forms to change the registered agent or registered office information.

Office: **5900 BALCONES DRIVE STE 100**

City

AUSTIN

State

TX

ZIP Code

78731

The above information is required by Section 171.203 of the Tax Code for each corporation or limited liability company that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director or manager and who is not currently employed by this, or a related, corporation or limited liability company.

sign here **Robin Jones**

Title

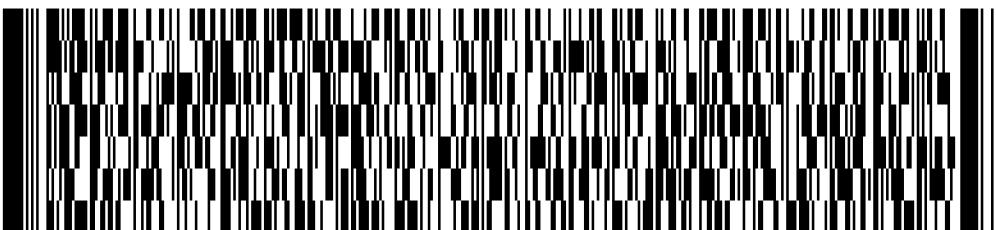
Electronic

Date

03-05-2026

Area code and phone number

Texas Comptroller Official Use Only



VE/DE	☐	PIR IND	☐
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EXHIBIT I

Obituary of Nicholas Ballard Herman (“Nick”)

Published by Legacy Remembers, June 5, 2025

<https://www.legacy.com/us/obituaries/legacyremembers/nicholas-herman-obituary?id=58563401>

Identifying facts stated in the obituary: Nicholas Ballard Herman, known as “Nick,” of Houston, Texas; born February 4, 1943, in Palacios, Texas; a certified public accountant and financial consultant; died May 30, 2025. The obituary lists his surviving wife and sons.

Following this page: pages 1–2 of the obituary as printed from Legacy.com on September 22, 2026. The remaining pages of the printout contain only guest-book entries and website content and are omitted.



[Herman](#) / [Nicholas Herman](#)



Nicholas Ballard Herman

1943 - 2025

[Send Flowers](#)

Follow

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Obituary



Guest Book



DIED 2025

Nicholas Herman Obituary

Published by Legacy Remembers on Jun. 5, 2025.

Nicholas Ballard Herman, known to all as "Nick", of Houston passed this life on earth May 30, 2025. He believed that God has a home for him, and for all of God's children, and he is looking forward to going there. Nick was born [REDACTED] in Palacios, Texas to Gilbert and Margaret Herman. Because of his father's military career, Nick traveled to Germany, Japan and many cities in Texas all through his childhood, finally settling in Corpus Christi, Texas where he graduated from Carroll High School. He attended Del Mar Junior College and continued to Texas A & I University in Kingsville, (now known as Texas A & M University at Kingsville) graduating with a BBA and CPA in 1967.

He started his career as a CPA, but because of his love for travel began his journey working as a Financial Consultant and continued his travels.

Nick is preceded in death by his parents, Gilbert and Margaret Herman, his son, Brad Herman and brother Wayne Herman. He is survived by his wife, Dee Herman, his friend and companion for 31 years of marriage, and sons, Randy

Herman and Jeff Herman and wife Lenny. In addition, Nick is survived by his sister, Anne Harrison and brothers Guy Herman, Michael Herman and Craig Herman and many nieces and nephews and two grandchildren.

Nick enjoyed traveling, dancing, tennis, attending sporting events and helping others. He donated his time whenever needed and was proud to volunteer his time and efforts to participate with the Palacios Preservation Association in "Saving the Luther Hotel". Nick was active on The Texas A & M University - Kingsville President's Leadership Council, Kingsville Athletic Department Javelina Advisory Council and Kingsville Alumni Board of Directors. He was also creator and sponsor of charitable funding group: "Funding for Children".

Dee will hold a memorial service for Nick at a time to be announced to friends and family. As per his wishes, Nick will be cremated and his remains placed at points that were important to him.

In lieu of flowers please consider a charitable donation to his alma mater: <https://www.javelinagiving.org/herman>; or a contribution in Nick's honor to a charity of your choice.

To plant trees in memory, please visit the [Sympathy Store](#).

Sign Nicholas Herman's Guest Book

Add a condolence...



7 Entries

Order Digital Guest Book



Thomas J Puff Esq July 28, 2026

Dee am so sorry to hear now of Nick's passing may 25..I was curious why he hadn't called 25 26..he was a dear

[See More](#)

[Share](#)



Truc Dang, Tri Hoang, and Jean Hoang June 16, 2025

I will never forget Nick's sweet (hoarsed. southern) voice when he occasionally called out Dee's name in our

[See More](#)

[Share](#)

EXHIBIT J

Excerpts of the “Operating Agreement of DAMAC Investments, LLC”
filed by Sophia Filfil as Exhibit B to her Motion to Transfer Venue
Cause No. 26DCV0903, Chambers County (filed September 29, 2026)

Pages included: first page (dated October 21, 2022); manager designation
 (“Beneficial Trust c/o Sophia Filfil”); signature page (“Chief Operating Officer”);
and Exhibit A (Sophia Filfil listed as 100% member). Full document on file.

**OPERATING AGREEMENT
OF
DAMAC Investments, LLC
a Texas Limited Liability Company**

This Operating Agreement of **DAMAC Investments, LLC** is executed as of October 21, 2022 (the "Effective Date") by the persons who sign and are identified as "Members" in this Agreement.

**ARTICLE I
DEFINITIONS**

1.01. Definitions. As used in this Agreement, the following terms have the following meanings:

"Affiliate" means, with reference to any person, any other person controlling, controlled by or under direct or indirect common control with such person.

"Agreement" means this Company Agreement, as amended from time to time.

"Assignee" means a person who receives a Transfer of all or a portion of the Membership Interest of a Member, but who has not been admitted to the Company as a Member.

"Bankrupt Member" means (except to the extent a Simple Majority consents otherwise) any Member (a) that (i) makes an assignment for the benefit of creditors; (ii) files a voluntary bankruptcy petition; (iii) becomes the subject of an order for relief or is declared insolvent in any federal or state bankruptcy or insolvency proceedings; (iv) files a petition or answer seeking for the Member a reorganization, arrangement, composition, readjustment, liquidation, dissolution, termination, or similar relief under any law; (v) files an answer or other pleading admitting or failing to contest the material allegations of a petition filed against the Member in a Proceeding of the type described in subclauses (i) through (iv) of this clause (a); or (vi) seeks, consents to, or acquiesces in the appointment of a trustee, receiver, or liquidator of the Member or of all or any substantial part of the Member's properties; or (b) against which a Proceeding seeking reorganization, arrangement, composition, readjustment, liquidation, dissolution, or similar relief under any law has been commenced and one hundred twenty (120) days have expired without dismissal thereof or with respect to which, without the Member's consent or acquiescence, a trustee, receiver, or liquidator of the Member or of all or any substantial part of the Member's properties has been appointed and ninety (90) days have expired without the appointment having been vacated or stayed, or ninety (90) days have expired after the date of expiration of a stay, if the appointment has not previously been vacated.

"Business Day" means any day other than a Saturday, a Sunday, or a holiday on which national banking associations in the State of Texas are closed.

"Capital Account" means a capital account maintained for a Member as provided by Treasury Regulation 1.704-1(b)(2)(iv) of the Regulations of the Internal Revenue Service.

"Capital Contribution" means the amount of money and the Net Value of property other than money contributed to the Company by a Member.

"Capital Commitment" of a Member represents the aggregate amount of capital that such Member has agreed to contribute to the Company.

"Certificate of Formation" means the initial, amended, and restated certificate of formation of the Company.

"Company" means DAMAC Investments, LLC, a Texas limited liability company.

"Default Interest Rate" means a rate per annum equal to the lesser of (a) six percent (6%) plus the prime rate published in The Wall Street Journal on the day the rate is determined (or the most recent day on which The Wall Street Journal was published if the paper is not published on the day the rate is determined), or a similar publication if The Wall Street Journal is no longer published, or (b) the maximum rate permitted by applicable law.

"Former Member" means any person who had executed this Agreement, as of the date of this Agreement as a Member, or hereafter admitted to the Company as a Member, as provided in the Agreement, but who is no longer a Member of the Company; however, this term does not include a person who ceases to be a Member as a result of bankruptcy, default or expulsion.

"Fundamental Business Transaction" has that meaning assigned to it by the definitions in the TBOC, as may be amended from time to time, and includes (a) a merger, (b) an interest exchange, (c) a conversion, or (d) a sale of all or substantially all of an entity's assets (with or without good will), other than in the usual and regular course of the Company's business.

"General Interest Rate" means a rate per annum equal to the lesser of (a) the prime rate published in The Wall Street Journal on the day the rate is determined (or the most recent day on which The Wall Street Journal was published if the paper is not published on the day the rate is determined), or a similar publication if The Wall Street Journal is no longer published, or (b) the maximum rate permitted by applicable law.

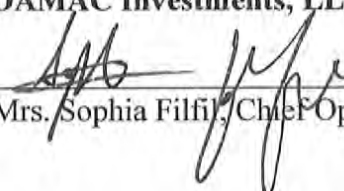
"Internal Revenue Code" means the Internal Revenue Code of 1986 and any successor statute, as amended from time to time.

"Manager(s)" means Beneficial Trust c/o Sophia Filfil, as the initial Manager of the Company, and shall also mean any other Person hereafter elected as a Manager of the

IN WITNESS HEREOF, the Managers have executed this Company Agreement, as of the Effective Date.

MANAGERS:

DAMAC Investments, LLC



Mrs. Sophia Filfil, Chief Operating Officer

EXHIBIT A
MEMBERS OF DAMA Investments, LLC

<u>Member's Name and Address</u>	<u>Initial Capital Contribution</u>	<u>Capital Commitment</u>	<u>Percentage Interest</u>
Mrs. Sophia Filfil [REDACTED] [REDACTED] [REDACTED] [REDACTED] d [REDACTED] [REDACTED] [REDACTED] 3	\$10,000.00	\$1,000.00	100.00%