

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.		

**DEFENDANT JONATHAN GARCIA’S VERIFIED RULE 12 MOTION TO SHOW
AUTHORITY**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Jonathan Garcia (“Garcia”), appearing pro se, moves under Texas Rule of Civil Procedure 12 for an order requiring Connor J. Smith and Doré Rothberg Law, P.C. to appear and show their authority to prosecute this suit on behalf of Plaintiff Damac Investments LLC (“Damac”), and shows:

1. Rule 12 permits a party, by sworn written motion, to challenge an attorney’s authority to prosecute a suit on behalf of another. Upon notice served at least ten days before the hearing, the burden is on the challenged attorney to show sufficient authority; if the attorney fails to do so, the Court shall refuse to permit the attorney to appear and shall strike the pleadings filed on behalf of the party. Tex. R. Civ. P. 12.

2. Garcia believes that this suit is being prosecuted on behalf of Damac without authority. Damac's authority to sue here rests entirely on Sophia Filfil's claim to control Damac. That claim depends on (a) a Certificate of Amendment filed December 15, 2025, which was signed by no member of Damac and which removed Garcia — a member of record since the April 1, 2025 Certificate of Amendment — without the vote of all members that the Texas Business Organizations Code requires, Tex. Bus. Orgs. Code § 101.356(d); and (b) a purported "Operating Agreement" dated October 21, 2022 and first produced on September 29, 2026, which contradicts the Secretary of State's and Comptroller's records and her own positions. (Answer ¶ 32; Answer Exhs. 1–4, 33.)

3. Garcia, a member of Damac of record, did not authorize Damac to bring this suit or to retain Doré Rothberg Law, P.C. Doré Rothberg Law also represents Ms. Filfil and her other companies, whose interests are adverse to Damac's members on the very question whether Ms. Filfil controls Damac.

4. Garcia therefore asks the Court to require counsel to show (a) who authorized this suit on Damac's behalf, and when; (b) the member vote or consent relied upon; and (c) the engagement agreement under which counsel represents Damac.

PRAYER

Garcia asks the Court to set this motion for hearing on at least ten days' notice to counsel; to require Connor J. Smith and Doré Rothberg Law, P.C. to show their authority to act for Damac; and, if they fail to do so, to refuse to permit them to appear for Damac and to strike all pleadings filed on Damac's behalf.

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 this motion are within my personal knowledge or are shown by the documents cited, and are true and correct. Tex. Civ. Prac. & Rem. Code § 132.001.

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

/s/ Jonathan Garcia

Jonathan Garcia, Declarant

CERTIFICATE OF CONFERENCE

On October 7, 2026, Garcia asked counsel for Plaintiffs and Ms. Filfil, Connor J. Smith, by email whether they oppose this motion. Counsel had not agreed before filing.

CERTIFICATE OF SERVICE

I certify that on October 7, 2026, a true and correct copy of this motion was served under Texas Rule of Civil Procedure 21a on Connor J. Smith, Doré Rothberg Law, P.C., csmith@dorelaw.com, and on all other counsel of record, through the electronic filing manager.

/s/ Jonathan Garcia

Jonathan Garcia