

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 MOTION FOR EXPEDITED, LIMITED DISCOVERY
BEFORE THE TEMPORARY-INJUNCTION HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Counter-Plaintiff, and Third-Party Plaintiff Jonathan Garcia (“Garcia”) moves for an order permitting limited discovery before the hearing on the pending applications for temporary injunction (Filings 66 and 68), and shows:

1. The Court may order discovery before initial disclosures are due and may shorten response times for good cause. Tex. R. Civ. P. 191.1, 192.2.

2. Good cause exists. The Court will be asked to decide, on an expedited basis, whether to preserve the Granbury escrows and Sofi Lakes funds. The information needed to frame that relief is held exclusively by the other side and by non-parties: the identity of the buyer or

assignee and the escrow for any resale of the Granbury property; the signed versions and electronic-signature audit trails of the Granbury contract amendments, including “Commercial Contract Amendment #1 - 7/22,” which Garcia did not sign; and the payments of Sofi Lakes funds to Zaza Landscape and related persons. (Filings 66, 68; Answer ¶¶ 6(d), 31.)

3. The requests are narrow (Appendix A) and can be answered from existing records in a few days.

PRAYER

Garcia asks the Court to order that the parties named in Appendix A respond to the requests in it within seven days of service of the order; that Garcia may serve subpoenas duces tecum on Lone Wolf Technologies (Authentisign) and Registered Agents Inc. for the records described in Appendix A, returnable within seven days; and that all other discovery proceed under the Rules.

Respectfully submitted,

/s/ Jonathan Garcia

JONATHAN GARCIA, pro se

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DEFENDANT/COUNTER-PLAINTIFF/

THIRD-PARTY PLAINTIFF

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

APPENDIX A — LIMITED EXPEDITED REQUESTS

To Sophia Filfil, 622 Sofi Lakes, LP, and Damac Investments LLC: (1) every contract, amendment, extension, assignment, or letter of intent for the purchase, resale, or assignment of the Granbury property ([REDACTED] Granbury, Hood County, Texas) or Damac's rights in it, executed or proposed after January 1, 2025; (2) for each, the title company, escrow number, and scheduled closing date; (3) all signed versions of "Commercial Contract Amendment #1 - 7/22" and any document dated after December 15, 2025 bearing Jonathan Garcia's name or signature.

To Providence Title Company: the escrow file for GF No. 13100025, including all amendments, extensions, signature pages, earnest-money records, and instructions received for Damac since December 15, 2025, and the identity of any resale or assignment escrow known to it.

To Yaalx Realty Group, LLC and Zachary Peters: all Authentisign envelopes sent for the Granbury transaction since December 1, 2025, with their certificates of completion and audit trails.

To Sophia Filfil and 622 Sofi Lakes, LP: a ledger of all payments since January 1, 2025 from Sofi Lakes funds or district bond reimbursements to Zaza Landscape, Martin Filfil, Michael Lloyd, or Zachary Peters, with invoices.

Subpoena to Lone Wolf Technologies (Authentisign): the certificate of completion and audit trail (sender, signers, email addresses, IP addresses, timestamps) for every envelope titled "Commercial Contract Amendment #1 - 7/22" or naming Jonathan Garcia as a signer, sent by ztxbroker@gmail.com since December 1, 2025.

Subpoena to Registered Agents Inc.: the order, instructions, authorization, and payment records for the Certificate of Amendment of Damac Investments, LLC filed December 15, 2025, including the identity of the person who requested it.