

CAUSE NO. 2026-70357

**622 SOFI LAKES, LP,
GO-M REALTY LLC, and
DAMAC INVESTMENTS
LLC,**

Plaintiffs,

v.

**JONATHAN GARCIA,
Defendant.**

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**IN THE DISTRICT
COURT OF**

**HARRIS COUNTY,
TEXAS**

**515TH JUDICIAL
DISTRICT**

**DEFENDANT JONATHAN GARCIA’S EMERGENCY MOTION FOR LEAVE TO
APPEAR REMOTELY (BY ZOOM OR TELEPHONE) AT THE OCTOBER 8, 2026
TEMPORARY-INJUNCTION HEARING AND AT ANY RESET OF IT**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Jonathan Garcia (“Garcia”), pro se, moves under Texas Rule of Civil Procedure 21d for leave to appear remotely at the temporary-injunction hearing Plaintiffs’ counsel has told the Court is set for today, October 8, 2026, at 12:00 p.m., and at any resetting of it, and shows:

1. Garcia resides in Orlando, Florida. He received his first notice of a noon setting today at 10:02 a.m. Eastern (9:02 a.m. Central) through a copy of Plaintiffs’ counsel’s email to the Court’s coordinator. He did not confirm today’s hearing and had been told it would be delayed. (See Defendant’s Emergency Motion for Continuance, filed today.) It is physically impossible for him to be in Houston by noon.

2. Rule 21d(b) permits a court to allow a participant to appear remotely for good cause. Tex. R. Civ. P. 21d. Good cause exists: Garcia is an unrepresented party 950 miles away who received under three hours’ notice of an evidentiary hearing that will decide whether he is enjoined. Remote appearance is the only way he can be heard today. Plaintiffs will suffer no prejudice — their one witness may appear exactly as planned, and Garcia will cross-examine by video or telephone.

3. Garcia asks that the Court permit him to appear by Zoom, or if Zoom is unavailable, by telephone at [REDACTED], and that the Court's staff provide the link or dial-in. Garcia further asks that the same leave extend to any reset of this hearing.

4. If the Court denies remote appearance and proceeds today, Garcia objects to the hearing going forward in his absence, objects to any extension of the Temporary Restraining Order (which expires today under Rule 680), and incorporates his Emergency Motion for Continuance and his Response in Opposition to Plaintiffs' Application for Temporary Injunction, both filed today.

PRAYER

Garcia asks the Court to grant leave for him to appear remotely by Zoom or telephone at the October 8, 2026 hearing and any reset of it, to direct the Court's staff to provide the link or dial-in information, and to 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, AND
THIRD-PARTY PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that on October 8, 2026, I emailed Connor J. Smith, counsel for Plaintiffs, copying the Court's coordinator, asking to appear remotely today. Given the time, I was unable to obtain counsel's agreement before filing. The motion is presented to the Court for determination.

/s/ Jonathan Garcia
Jonathan Garcia

UNSWORN DECLARATION

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

paragraph 1 of this motion; the facts stated there are within my personal knowledge and are true and correct. I am in Orlando, Florida today and cannot be physically present in Houston by noon. I declare under penalty of perjury that the foregoing is true and correct. Tex. Civ. Prac. & Rem. Code § 132.001.

Executed in Orange County, State of Florida, on the 8th day of October, 2026.

/s/ Jonathan Garcia
Jonathan Garcia, Declarant

CERTIFICATE OF SERVICE

I certify that on the 8th day of October, 2026, a true and correct copy of this motion was served on all counsel of record through the electronic filing manager under Texas Rule of Civil Procedure 21a and by email, including Connor J. Smith, Doré Rothberg Law, P.C., 16225 Park Ten Place, Suite 700, [REDACTED], csmith@dorelaw.com.

/s/ Jonathan Garcia
Jonathan Garcia