

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**

**95 — DEFENDANT JONATHAN GARCIA’S SECOND SUPPLEMENT TO VERIFIED
EMERGENCY APPLICATION TO PRESERVE THE GRANBURY ESCROWS —
CLARIFYING THE FORMS OF RELIEF REQUESTED**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant / Counter-Plaintiff Jonathan Garcia, pro se, supplements his Verified Emergency Application for Temporary Restraining Order and Temporary Injunction to Preserve the Granbury Escrows, set for hearing October 15, 2026, to state plainly the three forms of relief the Application already requests, in the order Garcia asks the Court to consider them. Nothing here enlarges the Application; it restates Part IV so the Court has a clear choice.

1. FIRST CHOICE — HOLD THE ESCROWS IN PLACE (Application Part IV(a)–(e))

Restrain Ms. Filfil, Plaintiffs, and those acting with them from closing, funding, assigning, or instructing on the Granbury purchase escrow (Providence Title, GF No. 13100025) or any resale or assignment escrow; restrain Providence Title from closing, funding, or disbursing on their instruction; restrain Yaalx Realty Group, Zachary Peters, Kevin Vader, and Texas Top Realty from acting on Ms. Filfil’s instructions or receiving commissions; require Providence’s sworn statement within five days; and preserve documents — all until the Court decides who may act for Damac Investments, LLC.

2. SECOND CHOICE — LET IT CLOSE, PARK THE MONEY (Application Part IV(b-1))

If the Court is unwilling to delay a closing, Garcia asks instead that the purchase and any resale be permitted to close on these conditions: (a) every dollar of net proceeds, profit, fee, or commission payable to or for the benefit of Damac Investments, LLC, Ms. Filfil, any trust or entity she controls, Yaalx Realty Group, LLC, Zachary Peters, Kevin Vader, or Texas Top Realty, LLC is deposited into the registry of this Court at closing, or held by the closing escrow agent, pending further order (Tex. R. Civ. P. 683; Tex. Civ. Prac. & Rem. Code § 64.001 by analogy); (b) the Court and Garcia receive written notice of any closing at least five days in advance, with the settlement statement; and (c) Providence Title files the sworn statement described in Part IV(d). This form of relief transfers nothing to Garcia and stops nothing; it only decides who holds the money while the Court decides who owns the company.

3. THIRD CHOICE — A NEUTRAL RECEIVER FOR DAMAC (Application Part IV, “Receiver”)

If the Court grants neither of the above, or if any person attempts to act for Damac in the Granbury transaction in the meantime, Garcia asks that the Court appoint a temporary receiver for Damac Investments, LLC under Tex. Civ. Prac. & Rem. Code § 64.001(a)(1), (6) and Tex. Bus. Orgs. Code § 11.404, with authority limited to the Granbury transaction and its proceeds, at Ms. Filfil’s expense, and that Ms. Filfil post a \$50,000 bond. Garcia’s Application for Temporary Receiver and proposed order are on file and incorporated here.

4. IN EVERY CASE

Garcia asks that the order (i) set bond at \$100 (Tex. R. Civ. P. 684), (ii) state the reasons for its issuance and set the cause for trial as Rule 683 requires, and (iii) order Providence Title to file and serve, within five days, the sworn statement identifying every escrow, buyer, assignee, file number, and sum held for the Granbury property, and every person from whom it has accepted instructions for Damac since December 15, 2025.

A proposed order containing all three alternatives, for the Court to mark, is submitted with this supplement.

Respectfully submitted,

/s/ Jonathan Garcia

JONATHAN GARCIA, pro se

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DEFENDANT, COUNTER-PLAINTIFF, AND
THIRD-PARTY PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on October 14, 2026, a true and correct copy of this supplement and the proposed order was served on all counsel of record through the electronic filing manager under Rule 21a, including Connor J. Smith, Laura Crabtree, and Cherie Schade, Doré Rothberg Law, P.C., csmith@dorelaw.com, lcrabtree@dorelaw.com, cschade@dorelaw.com.

/s/ Jonathan Garcia

Jonathan Garcia