

NO: 22-1155

IN THE SUPREME COURT OF TEXAS

**Brigetta D’Olivio aka Brigetta Alix Anderson, Alix Brigetta
Petitioner**

v.

**Hilary Thompson Hutson
Respondent**

**From the Fifth District Court Of Appeals, Cause No: 05-20-00969-CV,
and the 296th Judicial District Court for Collin County, Texas,
Cause No: 296-04855-2019, the Honorable John Roach, Jr**

**MOTION TO STAY PENDING CONSIDERATION OF MOTION TO
CORRECT THE RECORD AND MOTION TO DISMISS UNDERLYING
TRIAL COURT CAUSE NUMBER**

TO THE HONORABLE SUPREME COURT OF TEXAS:

COMES NOW, Brigetta D’Olivio, Petitioner, files the within “Motion To Stay Pending Consideration Of The Motion Correct The Record And Motion To Dismiss The Underlying Trial Court Cause Number”, and would show the Court as follows:

D’Olivio files the within Motion pursuant to Rule 10.1 of the TEX. R. APP. P.

The within motion is brought based upon the need to have a complete and accurate record, and is further brought based upon fraud.

That pursuant to Rule 52.10 of the TEX. R. APP. P., D'Olivio is respectfully requesting temporary relief. D'Olivio respectfully requests that this Court STAY all underlying proceedings, including, those related appeals, as outlined below, and to STAY any further review of D'Olivio's Petition For Review in this case pending the consideration of D'Olivio's Motion To Correct The Record and Motion To Dismiss the underlying trial court cause number. D'Olivio has complied with this rule and attached to the within motion is D'Olivio's Certificate of Compliance.¹

The Petition For Review for this case has been filed. The Petition For Review is taken from the Fifth District Court of Appeals, case number, 05-20-00969-CV: "*Brigetta D'Olivio aka Brigetta Alix Anderson, Alix Brigetta v Hilary Thompson Hutson*".

Said appeal is related to the following appeals in Fifth District Court Of Appeals and to the trial court cause numbers pending in the Collin County Probate

¹ If D'Olivio has cited the incorrect rule for a Stay, D'Olivio requests that this Court apply the correct Rule for a STAY.

Court:

1. 05-20-01118-CV (Tr. Ct. No: 002-02704-2020): “*Brigetta D’Olivio And All Other Occupants v Hilary Thompson Hutson*”;

2. 05-22-00768-CV, (Tr. Ct. No: GA1-0261-2018) “*In The Guardianship Of Richard W. Thompson, Jr., An Alleged Incapacitated Person*”.

3. PB1-1381-2019: “*In The Estate Of Richard W. Thompson, Jr; Deceased*”;

4. PB1-1493-2019: “*In re Custodial Accounts For The Benefit Of Timothy Thompson And Allan Thompson*”; and

5. PB1-1313-2019: “*Timothy C. Thompson, Allan R. Thompson, and Cindy Carmichael, as next of friend for Timothy C. Thompson and Allan R. Thompson, Plaintiffs v Hilary Hutson, individually and in her capacity as former custodian of custodial accounts f/b/o Timothy C. Thompson and Allan R. Thompson*”.

The Record Is Incomplete And Inaccurate

On January 21, 2023 D’Olivio sent a “Motion For Permission To Extend Time To File Petition For Review” to the Clerk of this Court. Attached to said motion

was evidence which supported the request D'Olivio made in said motion. Said motion was sent via FedEx, (tracking no: 771089634273).

On January 23, 2023, at 11:23am, Clerk, Alexander Claycomb, ("Claycomb"), signed for and received said motion. Attached hereto and incorporated herein as Exhibit 1 is a true and correct copy of the FedEx Proof Of Delivery, dated January 23, 2023, at 11:23am.

In said motion, D'Olivio requested that the January 23, 2023 due date for D'Olivio's Petition For Review be extended to fifteen (15) days after the date of resolution of the motion and supplemental motion, which was filed in the related appeal in Fifth District Court of Appeals, or in the alternative, that the January 23, 2023 due date be extended to February 15, 2023.²

At 12:23pm on January 23, 2023, Claycomb sent an email to Respondent's attorney, Bruce D. Cohen, ("Cohen"), wherein Cohen was directed to file a Response within three days if said motion was opposed. In said email, Claycomb also stated that said motion was attached to said email. Contrary to Claycomb's

² See D'Olivio's "Motion For Permission To Extend Time To File Petition For Review", dated January 18, 2023, file-stamped January 23, 2023.

statement, however, there was no motion attached to said email.³

On the same date, January 23, 2023, D’Olivio became aware that, prior to said motion having been filed for the record, the evidence, which was specifically referenced therein, and which was attached thereto, was separated from said motion, withheld and not filed. Said evidence is as follows:

1. D’Olivio’s “*Motion To Abate Pending Determination of Motion To Set Aside Order, Dated December 2, 2022 And Motion To Order The Trial Court To Hold hearing On Clerk’s Record And Reporter’s Record*”, which was filed in the Fifth District Court Of Appeals for related appeal, (05-22-00768-CV): “*In The Guardianship Of Richard W. Thompson, Jr., An Alleged Incapacitated Person*”, (tr. ct. cause no: GA1-0261-2018).⁴

2. D’Olivio’s “*Supplemental Motion To Abate Pending Determination of Motion To Set Aside Order, Dated December 2, 2022 And Motion To Order The Trial Court To Hold hearing On Clerk’s Record And Reporter’s Record*”, which

³ See within Exhibit 16, a true and correct copy of Claycomb’s Email to Cohen, dated January 23, 2023, at 12:23pm.

⁴ See D’Olivio’s “*Motion For Permission To Extend Time To File Petition For Review*”, dated January 18, 2023, file-stamped January 23, 2023, pp. 3-4.

was filed in the Fifth District Court Of Appeals for the above referenced related appeal, (05-22-00768-CV).⁵

3. Correspondence to the General Counsel at Supreme Court of Texas, Nina Hess Hsu, dated October 12, 2022.⁶

Said above-referenced evidence was separated from said motion, withheld and not filed despite the fact that:

1. Said evidence was not subject to a motion to seal, as a motion to seal was neither filed, nor pending.

2. Said evidence was not subject to any Order, which would otherwise, cause said evidence to be separated from said motion and to not be filed; and

3. Said motion complied with Rules 10.1 and 10.2 of the TEX. R. APP. P.

Upon becoming aware of Claycomb's email to Cohen,⁷ and the fact said above-referenced evidence was separated from said motion, withheld and not filed,

⁵ See D'Olivio's "Motion For Permission To Extend Time To File Petition For Review", dated January 18, 2023, file-stamped January 23, 2023, p. 5.

⁶ See D'Olivio's "Motion For Permission To Extend Time To File Petition For Review", dated January 18, 2023, file-stamped January 23, 2023, p. 5.

⁷ See within Exhibit 16, a true and correct copy of Claycomb's Email to Cohen, dated January 23, 2023, at 12:23pm.

D’Olivio sent correspondence to Clerk of the Court, Blake Hawthorne, (“Hawthorne”). In said Correspondence, which was filed in this Court on January 24, 2023, D’Olivio stated, in part, *“Petitioner notes for the record that, although her Motion For Permission To Extend Time To File Petition For Review was filed, the evidence attached to said motion has not been filed. Petitioner requests that the evidence, which was attached to said motion be filed and made part of the record and that the entire motion, with the evidence attached thereto be forwarded to the Chief Justice of the Supreme Court of Texas, and to the sitting Justices”*.⁸

In said Correspondence, D’Olivio further requested, that should Respondent, Hilary T. Hutson, (“Hutson”), file a Response to said above-referenced motion, that D’Olivio be afforded the opportunity to file a Reply prior to a decision being made on said motion.⁹ Hawthorne did not respond to said Correspondence, and nor was said above-referenced evidence filed for the record.

On January 25, 2023, Hutson filed a Response to D’Olivio’s “Motion For Permission To Extend Time To File Petition For Review”.¹⁰ At the time Hutson

⁸ See D’Olivio’s Correspondence To The Court, filed-stamped January 24, 2023, p. 1, par. 3.

⁹ See D’Olivio’s Correspondence To The Court, dated January 23, 2023, filed-stamped January 24, 2023, p. 1, par. 3.

filed her Response, said evidence remained separated from D’Olivio’s motion, withheld and not filed for the record.

Upon becoming aware that Hutson had filed a Response, D’Olivio sent an email to Claycomb on January 26, 2023. In said email, D’Olivio informed Claycomb that although she had not received a copy of Hutson’s Response by mail, nor email, D’Olivio had sent a Reply to Hutson’s Response to this Court via FedEx, and that the expected date of delivery for said Reply was Monday, January 30, 2023. In said email, D’Olivio requested that her Reply be included for review by the Justice(s) before any decision on said motion was made. Attached hereto and incorporated herein as Exhibit 2, is a true and correct copy of D’Olivio’s Email to Claycomb, dated January 26, 2023.¹¹

On Friday, January 27, 2023, however, this Court issued an Order. In said Order, the due date for D’Olivio to file her Petition for Review was extended from

¹⁰ See Hutson’s Response To Second Motion For Permission To Extend Time To File Petition For Review, dated January 25, 2023.

¹¹ D’Olivio’s “Petitioner’s Reply to Response of Respondent Hilary T. Hutson To Petitioner’s Second Motion For Request On Extension Of Time To File Petition For Review”, was delivered to, and filed in this Court, on January 30, 2023.

January 23, 2023 to February 7, 2023,¹² as opposed to D’Olivio’s request to extend the time to file her Petition For Review to fifteen (15) days after the date of resolution of the motion and supplemental motion, which was filed in the related appeal in Fifth District Court of Appeals, or in the alternative, that the January 23, 2023, due date be extended to February 15, 2023.¹³ Said Order was issued despite the following facts:

1. The above-referenced evidence, which was specifically referenced in D’Olivio’s Motion For Permission To Extend Time To File Petition For Review; which was material to D’Olivio’s request made in said motion; and which was attached thereto at the time Claycomb signed for and came into possession of said motion, remained separated from, withheld and not filed with said motion; and not filed for the record.

2. Said evidence continued to not be subject to any motion to seal, nor subject to any Order, which would otherwise cause said above-referenced evidence to be sealed, withheld and not filed with said motion.

¹² See this Court’s Order, dated and issued on January 27, 2023.

¹³ See D’Olivio’s “Motion For Permission To Extend Time To File Petition For Review”, dated January 18, 2023; file-stamped January 23, 2023.

3. D'Olivio had served and sent her Reply, and notified Claycomb prior to the issuance of said Order, wherein D'Olivio informed Claycomb that said Reply would be delivered on Monday, January 30, 2023; and requested that said Reply be included for review by the Justices prior any decision being regarding said above-referenced motion. ¹⁴

Where the evidence, which was specifically referenced in said motion; which was material to the request D'Olivio made in said motion; and which was attached to said motion, was still not be filed at the time this Court issued its Order, said evidence could not have been reviewed, nor considered by this Court prior to the issuance of said Order.

By separating said evidence from said motion, and by withholding and not filing said evidence, and by refusing to file said motion with the evidence, which was attached thereto, deprived D'Olivio of her right to due process by causing said evidence not to be reviewed and considered before said Order was issued.

¹⁴ See within Exhibit 2, a true and correct copy of D'Olivio's Email to Claycomb on January 26, 2023.

Likewise, where D’Olivio relied upon said evidence as a basis for her request, and where this Court issued said Order in the absence of said evidence also deprived D’Olivio of her right to due process.

As of this date, said motion remains filed without the evidence, which was attached thereto at the time Claycomb signed for and came into possession of said motion on January 23, 2023 and said evidence which was separated from said motion, withheld and not filed, remains not filed.¹⁵

D’Olivio has a right to have a complete and accurate record. By separating said above-referenced evidence from said motion and by not filing said evidence caused the record to be inaccurate and incomplete.

Accordingly, D’Olivio respectfully requests that the record be corrected and that the evidence, which was separated from said motion after Claycomb came into possession of said motion, be filed for the record and that the record specifically reflect that the Order, which was issued on January 27, 2023, was issued without the evidence, which was specifically referenced therein, and which was attached

¹⁵ See within Exhibit 1, a true and correct copy of FedEx Proof Of Delivery, dated January 23, 2023.

thereto at the time Claycomb signed for and came into possession of said motion on January 23, 2023.

Attorney, Bruce D. Cohen's Deception

As an attorney, Bruce D. Cohen, ("Cohen") is required to update his online attorney profile annually, as well as certify annually that the information which he provides in his online attorney profile is accurate. Said profile must comport to the requirements of §81.115 of the TEX. GOV'T CODE. Pursuant to §81.115(b)(4) of the TEX. GOV'T CODE, the profile must include "*the attorney's primary practice location*". TEX. GOV'T CODE §81.115(b)(4).

In all of his communications and in each of the pleadings, which Cohen has filed in the underlying trial court cause number, related trial court cause numbers, and related appeals in the Fifth District Court of Appeals and the Supreme Court of Texas, Cohen presents himself as a sole practitioner in his representation of Respondent, Hilary T. Hutson, ("Hutson").

In his presentation as a sole practitioner representing Hutson, Cohen conceals that the telephone numbers which he uses and provides as a sole practitioner are

actually the telephone numbers which are associated with his actual place(s) of employment.

Cohen further conceals that the physical and mailing addresses, which he uses and provides in his presentation as a sole practitioner representing Hutson, are the physical and mailing addresses, which he previously claimed were the physical and mailing addresses for the company(ies) for which he has been employed throughout his representation of Hutson.

In his presentation as a sole practitioner, and in all of his communications and pleadings, which Cohen filed on behalf of Hutson, Cohen concealed the name of the company for whom said physical and mailing addresses pertained, and further concealed that he was employed by those companies while presenting as a sole practitioner and while using said addresses as the addresses of his solo practice.

In his use of said addresses, Cohen further concealed that, despite using and providing physical and mailing addresses, neither he, nor the companies, with the exception of Pepsico Inc, for which he has been employed throughout his presentation as a sole practitioner representing Hutson, are listed as being at the

addresses which Cohen used and provided, and that, at least one of the addresses that he has used and provided does not exist.

In order to conceal from one of the companies with whom he was actually employed that he was presenting as a sole practitioner in his representation of Hutson, while simultaneously using the telephone number and address associated with the company, he directed that pleadings, correspondence, etc relating to the underlying trial court cause number, continue to be sent to the company's address, but that they be made in the care of Hutson. (Cohen and Hutson both worked at one of said companies).

Although throughout his presentation as a sole practitioner representing Hutson, Cohen has used the physical and mailing addresses of the companies with whom he was actually employed, as the physical and mailing addresses of his office as a sole practitioner, the email, which Cohen uses in his communications and pleadings, and which is on file with the trial courts, Fifth District Court of Appeals and this Court, is not an email associated with any law firm, or solo practice,

including one which would exist, if Cohen, in fact, had a law office/firm, but rather, is an email address from Michigan State University.

Cohen uses an email address from Michigan State University instead of the email addresses which were, and are, associated with Cohen's actual employment.

Where Cohen uses a Michigan State University email address in the communications and pleadings, which he has filed on behalf of Hutson, he uses his email addresses, which are associated with his actual employment *and* the Michigan State University email address, to engage in secret, ex parte communications with officers of the court regarding, not only the underlying trial court cause number, but also the related trial court cause numbers, including those related trial court cause numbers, which are currently on appeal with the Fifth District Court of Appeals, and those which are before this Court.

Where Cohen may have initially used an email address which is associated with a company with whom he was employed, not only did he switch to the Michigan State University email address, but he then attempted, through the CEO of one of said companies, to have those emails, which are part of the record, and which

contain the name of the company with whom he was actually employed, deleted so that they would not be made part of the record. (Cohen's ex parte communications are addressed in the next section).

In his presentation as a sole practitioner, and in his communications and pleadings, which he filed on behalf of Hutson, Cohen has engaged in further deception by using the address of one of the companies with whom he was employed as his office address for his solo practice, while simultaneously using the telephone number of a different company with whom he was employed as the telephone number for his solo practice.

At no point throughout his representation of Hutson as a sole practitioner has Cohen updated his online attorney profile with the Texas Bar Association so that his solo practice and its correct address, telephone number and email address are included. Cohen's failure to update his online attorney profile not only constitutes deception, but it also constitutes a failure to disclose, which is the equivalent of an affirmative misrepresentation. Cohen's failure to update his online attorney profile was done to conceal that the companies for which he worked, the capacity in which he worked for said companies, and the nature of his position in

each of said companies involved conduct that is prejudicial to the administration of justice by causing interference or potential interference with the outcome of the legal proceedings in this case, the underlying trial court cause numbers and related trial court cause numbers, as well as, the related appeals in the Fifth District Court of Appeals,¹⁶ and thus by causing injury or potential injury to D’Olivio as a party.

Cohen’s Employment Throughout The Time He Presented As
A Sole Practitioner In His Representation Of Hutson

Throughout his representation of Hutson in the underlying trial court cause number, and related trial court cause numbers, the appeal of the underlying trial court cause number, and related appeals in the Fifth District Court of Appeals and in this Court, Cohen has been employed by the following companies:

A. Pepsico-Frito-Lay North America, (Pepsico Inc)

Position: Sr. Legal Director of Sales/Antitrust
Address: 7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024
Telephone Number: 972-334-2260
Cell Number: 972-955-7661
Email: Bruce.Cohen@pepsico.com
Associated website: www.PepsiCo.com
Ceased working for PepsiCo January 2020.

Nature Of Cohen’s Position As
‘Sr. Legal Director Of Sales/Antitrust’ With Pepsico Inc.

In his LinkedIn profile, Cohen describes his position as Sr Legal Director Of

¹⁶ See D’Olivio’s Motion For Permission To Extend Time To File Petition For Review, filed January 23, 2023.

Sales/Antitrust as, *“Principal sales and antitrust counsel for Frito-Lay North America, with responsibility for compliance, training and contracting for the sales, accounting and finance teams across the United States”*.¹⁷

Cohen Presenting As A Sole Practitioner In His Representation Of Hutson While Employed By Pepsico Inc.

During the time period in which Cohen was employed by Pepsico as Director of Sales/Antitrust, he presented as a sole practitioner in his representation of Hutson in the underlying trial court cause number. In his presentation as sole practitioner, Cohen surreptitiously used PepsiCo Inc’s address and telephone number as the address and telephone number of his solo practice.

Attached hereto and incorporated herein as Exhibit 3 are true and correct copies of communications from Cohen and signature pages of pleadings filed by Cohen on behalf of Hutson. Said communications and pleadings are part of the clerk’s record for the underlying trial court cause number, and their location in the clerk’s record are identified in the footnotes:

¹⁷ See www.linkedin.com/in/brucedcohen

1. Correspondence, dated July 20, 2019

Capacity: Sole Practitioner: “*Bruce D. Cohen Attorney-at-Law*”

Used PepsiCo Inc Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Telephone Number: Not provided

Email address: Not provided

Filed in JP Court, (cause no: 31-EV-02201), ¹⁸

Filed in underlying trial court cause no: 296-04855-2019. ¹⁹

(See within Exhibit 3, pp. 1-2)

2. Petition: Eviction Case (31-EV-19-02201), dated July 25, 2019

Capacity: Sole Practitioner: “*Bruce D. Cohen Esq*”

Used PepsiCo Inc Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico Inc telephone number as telephone number for solo practice:

972-334-2260 ²⁰

Used Pepsico email address for email address for solo practice:

bruce.cohen@pepsico.com

Filed in JP Court, (cause no: 31-EV-02201), ²¹

Filed in underlying trial court cause no: 296-04855-2019. ²²

(See within Exhibit 3, p. 3)

¹⁸ This case, (31-EV-02201) was dismissed due to Title issue.

¹⁹ [1 CR 107-110] Clerk’s Record filed January 21, 2021. (appeal case no: 05-20-00969-CV)

²⁰ See within Exhibit 6, p. 2, a true and correct copy of Email from Cohen to D’Olivio, dated January 8, 2020.

²¹ This case, (31-EV-02201) was dismissed due to Title issue.

²² [1 CR 206; 404-407] (appeal case no: 05-20-00969-CV)

3. Application To Probate Will Not Produced In Open Court And For Issuance Of Letters Testamentary, filed July 30, 2019

Capacity: Sole Practitioner: “*Bruce D. Cohen*”

Used Pepsico Inc Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico Inc telephone number as telephone number for solo practice:

972-334-2260 ²³

Used Pepsico email address as email address for solo practice

bruce.cohen@pepsico.com

Filed in related cause no: PB1-1381-2019, in Collin County Probate Court

Filed in underlying trial court cause no: 296-04855-2019. ²⁴

(See within Exhibit 3, p. 4)

4. Docket Sheet for underlying trial court cause number, (296-04855-2019)

Capacity: Sole Practitioner - “Cohen, Bruce D. – Retained”

Used Pepsio Inc telephone number as telephone number for solo practice:

972-334-2260 ²⁵

Filed in underlying trial court cause no: 296-04855-2019 ²⁶

(see within Exhibit 3, p. 5)

²³ See within Exhibit 6, p. 2, a true and correct copy of Email from Cohen to D’Olivio, dated January 8, 2020.

²⁴ [1 CR 306] (appeal case no: 05-20-00969-CV)

²⁵ See within Exhibit 6, p. 2, a true and correct copy of Email from Cohen to D’Olivio, dated January 8, 2020.

²⁶ [1 CR 5] (appeal case no: 05-20-00969-CV)

5. Petition Of Plaintiff, (Trespass To Try Title), dated August 28, 2019

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pepsio Inc Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico Inc telephone number as telephone number of solo practice:

972-334-2260

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

Concealed email address associated with his employment at Pepsico Inc,

(bruce.cohen@pepsico.com)²⁷

Filed in underlying trial court cause no: 296-04855-2019²⁸
(See within Exhibit 3, p. 6)

6. Plaintiff’s Hilary Thompson Hutson’s Motion For Traditional And No-Evidence Summary judgment”, dated November 18, 2019

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pepsico Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico telephone number as telephone number for solo practice:

972-334-2260

Used Michigan State University email address as email address for solo

practice: cohenbru@msu.edu

Concealed email address associated with his employment at Pepsico, Inc.,

(bruce.cohen@pepsico.com)²⁹

²⁷ See within Exhibit 6, p. 2., a true and correct copy of Email from Cohen to D’Olivio, dated January 8, 2020.

²⁸ [1 CR 23] (appeal case no: 05-20-00969-CV)

²⁹ See within Exhibit 6, p. 2, a true and correct copy of Email from Cohen to D’Olivio, dated January 8, 2020.

Filed in underlying trial court cause no: 296-04855-2019 ³⁰

(See within Exhibit 3, p. 7)

7. Notice Of Consideration Of Plaintiff's Motion For Traditional And No-Evidence Summary Judgment On Submission, dated November 20, 2019

Capacity: Sole Practitioner: "*Bruce D. Cohen*"

Used Pepsico Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico telephone number as telephone number for solo practice:

972-334-2260

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Concealed email address associated with his employment at Pepsico, Inc., (bruce.cohen@pepsico.com) ³¹

Filed in underlying trial court cause no: 296-04855-2019 ³²

(See within Exhibit 3, pp. 8-9)

8. Tyler Technologies E-File Contact Information, December 20, 2020 No-Evidence Summary Judgment On Submission, dated November 20, 2019

Capacity: Sole Practitioner: "*Firm Name: Bruce D. Cohen*"

Used Pepsico Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico telephone number as telephone number for solo practice:

972-334-2260

Initially Used Pepsico Inc email address as email for solo practice and then switched to

³⁰ [1 CR 39] (appeal case no: 05-20-00969-CV)

³¹ See within Exhibit 6, p. 2, a true and correct copy of Email from Cohen to D'Olivio, dated January 8, 2020.

³² [1 CR 39] (appeal case no: 05-20-00969-CV)

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu
(See within Exhibit 18)

B. Pravati Capital LLC

Position: Director of Business Development
Address: 8117 Preston Rd, Suite 300
Dallas, TX 75225
Telephone Number: 214-613-3726
Email: cohen@pravaticapital.com
Associated website: www.Pravaticapital.com

Nature Of Cohen's Position As
'Director Of Business Development' With Pravati Capital LLC

Cohen began working at Pravati Capital LLC as the Director of Business Development in January 2020. In its press release, on July 29, 2020, wherein Cohen was introduced as the Director Of Business Development for Pravati Capital LLC for the Dallas-Fort Worth area, CEO of Pravati Capital LLC, Alexander Chucri, ("Chucri"), stated, in part, "*It is our mission to provide innovative, efficient capital solutions for law firms, compassionate assistance to plaintiffs...*".³³ Attached hereto and incorporated herein as Exhibit 4 is a true and correct excerpt from the July 29, 2020 press release, p. 1.³⁴

³³ See Cision PR Newswire, dated July 29, 2020: "*Pravati Capital Completes Expansion to Key Markets and Adds Accomplished New Hires to its Distinguished Leadership Team*". See also prnewswire.com/newsrelease/pravati-capital; <https://pravaticapital.com>; and <https://litigationfinancejournal.com/pravati-capital> and <https://pravaticapital.com>

³⁴ See See Cision PR Newswire, dated July 29, 2020: "*Pravati Capital Completes Expansion to Key Markets and Adds Accomplished New Hires to its Distinguished Leadership Team*".

In his Linked-In Profile, “Bruce D. Cohen”, Cohen describes his position as Director Of Business Development for Pravati Capital LLC in the Dallas-Fort Worth area, as: “*Senior attorney working with law firms and corporations to fund litigation and firm growth...*”.³⁵

Pravati Capital LLC Is Not Authorized To Transact Business In Texas

Section 9.001 of the Tex. Business Organization Code, (“BOC”), provides:

“(a) *To transact business in this state, a foreign entity must register under this chapter if the entity:*

(1) is a foreign corporation, foreign limited partnership, foreign limited liability company, foreign business trust, foreign real estate investment trust, foreign cooperative, foreign public or private limited company, or another foreign entity, the formation of which, if formed in this state, would require the filing under Chapter 3 (Limited Liability Companies) of a certificate of formation; or

(2) affords limited liability under the law of its jurisdiction of formation for any owner or member.

(b) A foreign entity described by Subsection (a) must maintain the entity’s

See also prnewswire.com/newsrelease/pravati-capital; <https://pravaticapital.com>

³⁵ Bruce D. Cohen’s LinkedIn Profile for July 2020.

registration while transacting business in this state". TEX. BUS. ORG. CODE

§9.001(a) & (b).

Section 9.008(b) of the TEX. BUS. ORG. CODE provides: "*Except in a proceedings to revoke registration, the secretary of state's issuance of an acknowledgment that the entity has filed an application is conclusive evidence of the authority of the foreign filing entity to transact business in this state under the entity's name or under another name stated in the application, in accordance with Section 9.004 (Registration Procedure)(b)(1)*". TEX BUS. ORG. CODE §9.008(b)(1).

Pravati Capital LLC was formed under the jurisdiction of the laws of the state of Delaware on October 3, 2013. On December 11, 2018, Pravati Capital LLC registered as a foreign limited liability company in the state of Arizona. See within Exhibit 4, a true and correct copy "Application For Registration Of Foreign Limited Liability Company, dated December 11, 2018, pp. 2-7.

As of this date, Pravati Capital LLC has failed to comply with §9.001(a) of the TEX. BUS. ORG. Code by failing to register as a foreign entity. See Exhibit 4, a true and correct Texas Comptroller Entity Search for "Pravati Capital", wherein

there are no records for “Pravati Capital”; and a true and correct copy of D’Olivio’s public information request to the Texas Secretary of State, dated December 1, 2021; Email from Je T’aime F. Swindell, (“Swindell”), of the Business and Public Filings Division of the Texas Secretary of State, dated December 20, 2021.

In said email atty Swindell of the Business and Public Filings Division of the Texas Secretary of State, stated, in part, “...*A search for submitter, “Pravati Capital LLC” and there have been no filings submitted to this office under this name*”, pp. 8-11.

Because Pravati Capaital LLC has filed to comply with §9.001(a) of the TEX. BUS. ORG. CODE, Pravati Capital LLC has never been authorized to transact business in this State.

Neither Pravati Capital LLC, Nor Cohen Are Listed As Tenants, Nor Owners Of Any Suite At The Address: 8117 Preston Rd., Dallas TX 75225

On its website, under the icon “Contacts”, Pravati Capital LLC lists the address for its headquarters as: 7154 E. Stetson Dr., Suite 210 Scottsdale AZ 85251, and it lists the address for its Texas location as: 8117 Preston Rd., Suite 300, Dallas, TX 75225. Attached hereto and incorporated herein as Exhibit 5, a true and correct

copy of “Contact” page from the Pravati Capital LLC website, (www.pravaticapital.com), p. 1.

In his communications and pleadings, which Cohen has filed on behalf of Hutson, and in his presentation as a sole practitioner in his representation of Hutson, Cohen lists his office address as: 8117 Preston Rd., Suite 300, Dallas, TX, 75225.

The Dallas County Appraisal District’s list of tenants and owners for the address: 8117 Preston Rd, Dallas, TX, for the years 2020-2021, which is the time period in which Cohen was employed by Pravati Capital LLC,³⁶ shows that neither Pravati Capital LLC, nor Cohen were listed as tenants, nor owners of *any* suite at said address, (8117 Preston Rd., Dallas TX, 75225). See within Exhibit 5, a true and correct copy of Dallas County Appraisal District all of the tenants and owners at the address: 8117 Preston Rd., Dallas, TX, pp. 2-6.

Where Cohen has continued to use said address, (8117 Preston Rd., Suite 300, Dallas TX 75225) as his office address as sole practitioner in his representation of Hutson, the Dallas County Appraisal District’s list of tenants and owners of said

³⁶ See within Exhibit 8, a true and correct copy of Cohen’s attorney profile with the Texas Bar Association.

See also Cohen’s LinkedIn profile, (www.linkedin/in/brucedcohen)

address and, in particular, of said suite for said address, for the year 2022-2023, continues to show that neither Pravati Capital LLC, nor Cohen are listed as tenants, nor owners of said address, nor suite at said address, (8117 Preston Rd., Suite 300, Dallas TX, 75225). See within Exhibit 5, a true and correct copy of Dallas County Appraisal District list of tenants for suite 300 at 8117 Preston Rd., Dallas, pp. 7-8.

Cohen Presenting As A Sole Practitioner In His Representation Of Hutson
While Employed By 'Pravati Capital LLC'

During the time period in which Cohen was employed by Pravati Capital LLC as Director of Business Development, he presented as a sole practitioner in his representation of Hutson. In his presentation as sole practitioner, Cohen surreptitiously used Pravati Capital LLC's address and telephone number as the address and telephone number of his solo practice. Attached hereto and incorporated herein as Exhibit 6 are true and correct copies of communications from Cohen and signature pages of pleadings filed by Cohen on behalf of Hutson. Said communications and pleadings are part of the clerk's record for the underlying trial court cause number, and related trial court cause number, both of which are before this Court. The location of the communications and pleadings are in the clerk's record for each respective case and are identified in the footnotes:

1. D’Olivio’s Certificate of Service, dated January 2, 2020, addressed to Cohen at Pepsico address and Pravati Capital LLC address since Cohen did not file change of address with the trial court to reflect the Pravati Capital LLC address.

Filed in related trial court cause number, (002-02704-2020; 5th Court of Appeal no: 05-20-01118-CV) ³⁷

(See within Exhibit 6, p. 1)

2. Email from Cohen to District Clerk Coordinator, Charla Kiser, dated January 8, 2020.

Used his Pepsico Email address: Bruce.Cohen@pepsico.com

Concealed email address associated with his employment at Pravati Capital LLC: (cohen@pravaticapital.com)

Cc’d himself a copy of his own email to the Michigan State University email address: cohenbru@msu.com

Filed in underlying trial court cause number: 296-04855-2019. ³⁸

At the bottom of said email, dated January 8, 2020, is the logo for Pepsico;

Cohen’s position with Pepsico, Office telephone number for Pepsico, (972-334-

2260), and address for Pepsico, (7701 Legacy Drive, Plano, TX 75024). See within

Exhibit 6, p. 2.

³⁷ [1 CR 711] (appeal case no: 05-20-01118-CV)

³⁸ [1 CR 475] (appeal no: 05-20-00969-CV)

3. Email from Cohen to D’Olivio, dated January 10, 2020

Used Michigan Sate University email address: cohenbru@msu.edu

Concealed email address associated with his employment at Pravati Capital LLC: (cohen@pravaticapital.com)

Filed in underlying trial court cause number, (296-04855-2019).³⁹

(See within Exhibit 6, p. 3)

On par. 4 of said email, dated January 10, 2020, Cohen stated, in part, “*Finally, please note that I am no longer using the bruce.cohen@pepsico.com email address, but will rely solely on the email from which this message has been sent, and which is included in the pleadings in the pending litigation*”.

Although Cohen wanted to ensure that his pepsico email address would no longer be used as it related to his representation of Hutson, he continued to use the Pepsico address as his office address as a sole practitioner and retained counsel for Hutson. This is despite the fact that he was no longer employed by Pepsico, but rather, was employed by Pravati Capital LLC at that time. In said email, dated January 10, 2020, Cohen further stated, “*Should you intend to serve any documents to my physical address rather than by email, you may continue to send them to the Pepsico office, but please do so to my attention, in care of Ms. Hutson*”. Hutson also worked at Pepsico.

³⁹ [1 CR 478] (appeal no: 05-20-00969-CV)

4. Defendant's Response To Motion To Set Aside, dated January 10, 2020

Capacity: Sole Practitioner: "Bruce D. Cohen"

Used Pepsio Inc Address as Address for Solo Practice:

7701 Legacy Dr, MC: 3A-130C, Plano, TX 75024

Used Pepsico Inc telephone number as telephone number of solo practice:

972-334-2260

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Concealed email address associated with his employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in related trial court cause no: 296-05192-2019 ⁴⁰

(See within Exhibit 6, p. 4)

5. Notice of Consideration of Plaintiff's Motion For Summary Judgment, dated June 11, 2020

Capacity: Sole Practitioner: "Bruce D. Cohen"

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in underlying trial court cause no: 296-04855-2019 ⁴¹

(See within Exhibit 6, p. 5)

⁴⁰ Hutson was defendant in said related trial court cause number.

⁴¹ [1 CR 535-536] (appeal no: 05-20-00969-CV)

6. Renewed Motion For Traditional And No-Evidence Summary Judgment, dated June 25, 2020

Capacity: Sole Practitioner: “*Bruce D. Cohen*”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email for solo practice: cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in underlying trial court cause no: 296-04855-2019 ⁴²

(See within Exhibit 6, p. 6)

7. Correspondence to D’Olivio, dated July 8, 2020 and Envelope, dated July 8, 2020

Capacity: Letterhead, Sole Practitioner,
“*Bruce D. Cohen Attorney-at-Law*”

Capacity: Envelope: Sole Practitioner, “*Bruce D. Cohen, Esq.*”.

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Telephone Number: Not provided

Email Address: Not provided

Filed in underlying trial court cause number, (296-04855-2019). ⁴³

(See within Exhibit 6, pp. 7-8)

8. Correspondence from D’Olivio to Cohen, dated July 11, 2020

⁴² [1 CR 419] (appeal no: 05-20-00969-CV)

⁴³ [1 CR 538-539] (appeal no: 05-20-00969)

D’Olivio addressed the letter to Cohen at the PepsiCo address and the Pravati Capital LLC address since Cohen had been using both of the address and because Cohen had not filed a Change of Address to reflect the Pravati Capital LLC. In said correspondence, D’Olivio expressly addressed the fact that Cohen was using different addresses and emails. Filed in underlying trial court cause number, (296-04855-2019).⁴⁴ (See within Exhibit 6, pp. 9-13)

9. E-File Envelope Details, dated August 16, 2020

Capacity: Sole Practitioner, “Firm Name: Bruce D. Cohen”

Filed in related trial court cause numbers: (31-EV-20-00951) and (002-02704-2020).⁴⁵

(See within Exhibit 6, p. 14)

10. Petition: Eviction, dated August 16, 2020

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address as Address for Solo Practice:
8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email as email for solo practice:
cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in related trial court cause numbers: (31-EV-20-00951)

⁴⁴ [1 CR 540-542] (appeal no: 05-20-00969-CV)

⁴⁵ [1 CR 24] (appeal no: 05-20-01118-CV)

and (002-02704-2020).⁴⁶

(See within Exhibit 6, p. 15)

11. Correspondence, dated September 2, 2020

Capacity: Sole Practitioner: “*Bruce D. Cohen ‘Attorney-at-Law’*”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Telephone Number: Not Provided

Email Address: Not provided

Filed in related trial court cause numbers: (31-EV-20-00951) and (002-02704-2020).⁴⁷

(See within Exhibit 6, p. 16)

12. Case Assignment/Case Info, dated December 7, 2020

Capacity: Sole Practitioner: “*Cohen, Bruce D. – Retained*”

Filed in related trial court cause number, (002-02704-2020)⁴⁸

(See within Exhibit 6, p. 17)

13. Docket Sheet, filed December 7, 2020

Capacity: Sole Practitioner: “*Cohen, Bruce D. – Retained*”

Filed in related trial court cause number, (002-02704-2020)⁴⁹

(See within Exhibit 6, p. 18)

⁴⁶ [1 CR 24-25] (appeal no: 05-20-01118-CV)

⁴⁷ [1 CR 23] (appeal no: 05-20-01118-CV)

⁴⁸ [1 CR 5] (appeal no: 05-20-01118-CV)

⁴⁹ [1 CR 13] (appeal no: 05-20-01118-CV)

14. Corrected Proposed Order, dated December 16, 2020

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in related trial court cause numbers: (002-02704-2020).

(See within Exhibit 6, p. 19)

15. Certificate of Service, dated December 18, 2020 and Certificate of Service, dated December 23, 2020

In said Certificates of Service, D’Olivio included the Pepsico address and the Pravati Capital LLC Certificate of Service since a Change of Address had not been filed.

Filed in related trial court cause numbers: and (002-02704-2020).⁵⁰

(See within Exhibit 6, pp. 20-21)

16. Plaintiff’s Response To Defendant’s Reply, dated September 18, 2020

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

⁵⁰ [1 CR 422; 434] (appeal no: 05-20-01118-CV)

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in underlying trial court cause number: (296-04855-2019).

(See within Exhibit 6, p. 22)

17. Plaintiff's Response To Defendant's Reply, dated October 9, 2020

Capacity: Sole Practitioner: "Bruce D. Cohen"

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email for solo practice:
cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital LLC, (cohen@pravaticapital.com)

Filed in underlying trial court cause number: (296-04855-2019).⁵¹

(See within Exhibit 6, p. 23)

18. Plaintiff's Request For Designation Of Additional Items, dated January 5, 2021

Capacity: Sole Practitioner: "Bruce D. Cohen"

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number as telephone number of solo practice: 214-613-3726

Used Michigan State University email address as email for solo practice:
cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital

⁵¹ [2 CR 380] (appeal no: 05-20-00969-CV)

LLC, (cohen@pravaticapital.com)

Filed in underlying trial court cause number: (296-04855-2019).⁵²

(See within Exhibit 6, p. 24)

While still employed by Pravati Capital LLC as Director of Business

Development, Cohen filed the following correspondence and pleadings filed in the Fifth District Court of Appeals, wherein he continued to present as sole practitioner in his representation of Hutson. In his correspondence and pleadings, Cohen continues to use the address of Pravati Capital LLC as the office address of his solo practice, but also uses the PepsiCo Inc telephone number as the telephone number of his solo practice; and the Michigan State University email address as his email address for his solo practice.

19. Appellee's Motion To Dismiss For Want Of Jurisdiction And Failure To Prosecute, dated January 20, 2021

Capacity: Sole Practitioner: "*Bruce D. Cohen*"

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pepsico Inc telephone number as telephone number of solo practice: 972-334-2260

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital

⁵² [2 CR 427] (appeal no: 05-20-00969-CV)

LLC, (cohen@pravaticapital.com)

Filed in Fifth District Court Of Appeals (case no: 05-20-00969-CV).

(See within Exhibit 6, pp. 25-26)

20. Correspondence to Fifth District Court of Appeals, dated February 10, 2021

Capacity: Sole Practitioner:

“Bruce D. Cohen – Attorney and Counselor At Law”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Personal Cell Number as telephone number of solo practice:

972-955-7522

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital

LLC, (cohen@pravaticapital.com)

Filed in Fifth District Court of Appeal (case no: 05-20-00969-CV).

(See within Exhibit 6, p. 27)

21. Appellee’s Reply To Appellant’s Response To Motion To Dismiss For Want Of Jurisdiction And Failure To Prosecute, dated February 11, 2021

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pepsico Inc telephone number as telephone number of solo

practice: 972-334-2260

Used Michigan State University email address as email for solo practice:

cohenbru@msu.edu

Concealed email address associated with employment at Pravati Capital

LLC, (cohen@pravaticapital.com)

Filed in Fifth District Court Of Appeals (case no: 05-20-00969-CV).

(See within Exhibit 6, p. 28)

C. Major, Lindsey, & Africa, LLC

Position: Director of In-House Counsel Recruiting Team

Address: 6900 North Dallas Parkway, Suite 300, Plano, TX 75024

Telephone Number: 214-414-2455

Email: brcohen@MLAGlobal.com

Associated website: www.mlaglobal.com

Nature Of Cohen's Position As
'Director Of In-House Counsel Recruiting Team'
For Legal Recruiting Firm, 'Major, Lindsey, & Africa, LLC'

Cohen began working for 'Major, Lindsey & Africa, LLC' as Director Of In-House Counsel Recruiting Team' on or about March 8, 2021. Attached hereto and incorporated herein as Exhibit 7 is a true and correct copy of Cohen's profile page on the website for 'Major, Lindsey & Africa, LLC, (www.mlaglobal.com).

On March 8, 2021, Cohen certified his statutory online attorney profile with the Texas Bar Association, wherein he listed "Major, Lindsey & Africa". Attached hereto and incorporated herein as Exhibit 8 is a true and correct copy of Cohen's online attorney profile with the Texas Bar Association, dated March 8, 2021.

On p. 2 of its Application For Certificate of Authority with the Texas Secretary Of State, 'Major, Lindsey & Africa LLC' states that its purpose or purposes of the limited liability company that it proposes to pursue in the transaction of business in Texas is "*Legal Recruiting*". Attached hereto and incorporated herein as Exhibit 9

is a true and correct copy of Major, Lindsey & Africa LLC's Application For Certificate of Authority, filed September 30, 2005; Amendment to Registration, filed September 23, 2008; Statement of Change Of Address Of Registered Agent, filed October 30, 2009; and Incorporation of Major, Lindsey & Africa, LLC, filed with the Maryland Secretary of State on October 30, 2009; and Certificate of Merger, filed with Delaware Secretary Of State on October 30, 2009.

Nowhere in his attorney profile, however, did Cohen state that 'Major, Lindsey & Africa LLC' was a legal recruiting firm, nor that the nature of Cohen's position with 'Major, Lindsey & Africa LLC' was as a legal recruiter. Instead, under the subtitle, "Practice Areas", Cohen listed his areas of practice as, "*Antitrust, Bankruptcy, Business, Creditor-Debtor, Litigation: Commercial; Litigation: Personal Injury*",⁵³ thereby making it appear that "Major, Lindsey & Africa LLC" was a law firm, as opposed to a legal recruiting firm, and that it was those above-referenced "practice areas" that he performed with Major, Lindsey & Africa LLC, as opposed to his actual role as "Director Of In-House Counsel Recruiting Team", for the legal recruiting firm, "Major, Lindsey & Africa LLC". Cohen's

⁵³ See within Exhibit 8, a true and correct copy of Cohen's online attorney profile with the Texas Bar Association, dated March 8, 2021.

deception is further highlighted by the fact that nowhere in his attorney profile did Cohen state that he was a sole practitioner.

In his Linked-In Profile, “Bruce D. Cohen”, Cohen describes his position as ‘Director of In-House Counsel Recruiting Team’ with ‘Major, Lindsey & Africa LLC’, as not only assisting law firms in placing attorneys in positions in law firms, but also assisting “*corporations, nonprofits, government agencies and higher education institutions*”⁵⁴ in placing attorneys in corporations, nonprofits, government agencies and higher education institutions.

Neither ‘Major, Lindsey & Africa LLC’, Nor Cohen Are Listed As Tenants, Nor Owners Of Any Suite At The Address 6900 Dallas Pkwy, Plano TX

In his online attorney profile with the Texas Bar Association, Cohen lists ‘Major, Lindsey & Africa LLC’s address as 6900 Dallas Pkwy, Suite 300, Plano, TX 75024. The Collin County Appraisal District, however, lists said address as the *mailing* address for the entity, “6900 North Dallas Parkway Tenant, LLC”, whose DBA is Wework.⁵⁵ Attached hereto and incorporated herein as Exhibit 10 is a true and correct copy of the Collin County Appraisal District record for said

⁵⁴ See www.linkedin.com/in/brucedcohen.

⁵⁵ WeWork Companies LLC is a member of ‘6900 North Dallas Parkway Tenant LLC’.

address: 6900 Dallas Pkwy, #300 Plano, TX 75024, (Property ID #: 2815358; Owner ID #: 1145870).

Where 'WeWork' rents out suite 300, neither Major, Lindsey, & Africa, LLC', nor Cohen, are listed as tenants, nor owners. (See within Exhibit 10, p. 2).

Where Cohen lists Major, Lindsey & Africa, LLC's address as 6900 Dallas Pkwy, Suite 300, Plano, TX on his profile with the Texas Bar Association,⁵⁶ on its website, (mlaglobal.com), Major, Lindsey & Africa LLC, does not list any office in Texas as being located in Plano. In fact, on its website, it lists only two (2) locations in Texas – Dallas and Houston.

On its website, Major, Lindsey & Africa LLC, provides a directions icon for the Dallas location. Said location is listed as: 1920 McKinney Ave, Dallas, TX. The Dallas County Appraisal District, however, does not list 'Major, Lindsey & Africa, LLC, nor Cohen as tenants or owners at said address, (1920 McKinney Ave., Dallas TX). (See within Exhibit 10, p. 3-4). Where Major, Lindsey & Africa LLC is listed as having an address of: 3131 McKinney Ave, Suite 3250, Dallas, TX,

⁵⁶ See within Exhibit 8, a true and correct copy of Cohen's online attorney profile with the Texas Bar Association, dated March 8, 2021.

said address has been permanently closed and is occupied by an unrelated company. (See within Exhibit 10, pp. 5-6).

Cohen Presenting As A Sole Practitioner In His Representation Of Hutson
While Employed By 'Major, Lindsey & Africa, LLC'

During the time period in which Cohen has been employed by Major, Lindsey & Africa LLC as Director of In-House Counsel Recruiting Team, he has presented as a sole practitioner in his representation of Hutson. In his presentation as sole practitioner, Cohen has continued to use the addresses and telephone numbers of the companies with whom he is/was employed, as the office address and telephone number of his solo practice. He has also continued to use a Michigan State University email address as the office email address for his solo practice. Attached hereto and incorporated herein as Exhibit 11 are true and correct copies of communications from Cohen and signature pages of pleadings filed by Cohen on behalf of Hutson in the Fifth District Court Of Appeals and Supreme Court of Texas. Said communications and pleadings are part of the clerk's record

1. Response Brief Of Appellee Hilary Thompson Hutson, dated August 26, 2021

Capacity: Sole Practitioner: “Bruce D. Cohen”

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address on cover page and signature page of response Brief as address of solo practice

Used Pravati Capital LLCTelephone number on Cover Page of Response Brief as telephone number of solo practice: 214-613-3726

Used Pepsico Inc telephone number on signature page of Response Brief as telephone number of solo practice: 972-334-2260

Used Michigan State University email address on cover page and signature page of Response Brief as email for solo practice:
cohenbru@msu.edu

Concealed address, telephone number and email address associated with employment ‘Major, Lindsey, & Africa, LLC’, (brcohen@MLAGobal.com)

Filed in Fifth District Court Of Appeals: (case no: 05-20-01118-CV)

(See within Exhibit 11, pp. 1-2)

2. Appellee’s Response Brief, dated September 27, 2021

Capacity: Sole Practitioner: “Bruce D. Cohen”

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address on cover page and signature page of Response Brief as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Pravati Capital LLC telephone number on cover page of Response Brief as telephone number for solo practice: 214-613-3726

Used Pepsico Inc telephone number on signature page of Response Brief as telephone number of solo practice: 972-334-2260

Used Michigan State University email address on both cover page and signature page of Response Brief as email address for solo practice:
cohenbru@msu.edu

Concealed the address, telephone number and email address associated with employment ‘Major, Lindsey & Africa, LLC’

Filed in the Fifth District Court Of Appeals, (case no: 05-20-00969-CV)

(See within Exhibit 11, pp. 3-4)

3. Respondent, Hilary T. Hutson’s Response to D’Olivio’s Petition For Writ Of Mandamus, dated November 22, 2021 and Envelope, dated January 25, 2023

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Pravati Capital LLC Address as Address for Solo Practice:

8117 Preston Rd., Suite 300, Dallas, TX 75225

Used Major, Lindsey & Africa LLC telephone number as telephone number for solo practice: 214-414-2455

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Concealed address and email address associated with employment at ‘Major, Lindsey, & Africa, LLC.

Filed in Supreme Court of Texas: (case no: 21-0799)

(See within Exhibit 11, p. 5)

4. Email from Cohen to Claycomb, dated, January 23, 2023

Capacity: Sole Practitioner: “Bruce D. Cohen”

Used Nonexistent Address as Address for solo practice:

6900 North Dallas Parkway, Suite 6900, Plano, TX 75024

Used Major, Lindsey & Africa, LLC telephone number as telephone number of solo practice: 214-414-2455

Used University Of Michigan Email Address as email address of solo practice: cohenbru@msu.com

Concealed address and email address associated with employment at ‘Major, Lindsey, & Africa, LLC.,

Filed in Supreme Court of Texas, (case 22-1155)

5. Response Of Respondent Hilary Thompson Hutson To Petitioner's Second Motion For Request For An Extension Of Time To File Petition For Review, dated January 25, 2023

Capacity: Sole Practitioner: "*Bruce D. Cohen*" on Cover Page

Capacity: Sole Practitioner: "*Bruce D. Cohen*" on envelope

Used Nonexistent Address on both Envelope and cover page for Response as Address for solo practice:

6900 North Dallas Parkway, Suite 6900, Plano, TX 75024

Used Major, Lindsey & Africa LLC telephone number on cover page as telephone number for solo practice: 214-414-2455

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Filed in the Supreme Court of Texas: (case no: 22-1155)

(See Exhibit 11, pp. 6-7)

6. Response Of Respondent Hilary Thompson Hutson To Petitioner's Second Motion For Request For An Extension Of Time To File Petition For Review, dated January 25, 2023

Capacity: Sole Practitioner: "*Bruce D. Cohen*"

Used Major, Lindsey & Africa, LLC Address as Address for solo practice: 6900 North Dallas Parkway, Suite 300, Plano, TX 75024

Used Unknown telephone number as telephone number for solo practice: 214-214-2455

Used Michigan State University email address as email address for solo practice: cohenbru@msu.edu

Filed in Supreme Court of Texas, (case no: 22-1155)

(See within Exhibit 11, p. 8)

As the preceding facts and evidence show, for more than three and a half years.

Cohen has been presenting as a sole practitioner, wherein he has deceived the trial

courts, Fifth District Court of Appeals, this Court, the Texas Bar Association, and D'Olivio. In his deception, Cohen has used addresses and telephone numbers of his places of employment to make it appear that said addresses and telephone numbers were those of his solo practice, and has also used a Michigan State University email address as the email address for his solo practice.

As the preceding facts and evidence further show, one (1) of the companies with whom Cohen was employed lacks the authority to transact business in this State. One (1) of the addresses, which Cohen has used does not exist, while two (2) of the addresses, which Cohen claimed were the addresses for two (2) of the companies with whom Cohen was/is employed are phony addresses, as the evidence has shown that neither the companies, nor Cohen are listed as tenants nor owners of said addresses. Said deception and conduct by Cohen is not accidental. It is strategic and constitutes fraud. Where fraud exists, the administration of justice cannot be served as fraud permeates every fiber of a case and creates a lack of impartiality and fundamental unfairness. As an officer of the court, Cohen is bound by the duty to have candor before the Courts. Cohen has failed to do that, and, in fact, has continued unabated in his utter lack of candor.

Throughout this time, Cohen has never filed, nor served a Change of Address in the underlying trial court cause number, nor the related trial court causes numbers, nor in the Fifth District Court of Appeals for the related appeals, nor in this Court as it relates to the cases pending before it. Evidence of Cohen's deception and contumacious disregard for the rules is the fact that Cohen's contact information, which this Court also depends upon in administering its duties remains fraudulent. Said contact information includes the company, which lacks the authority to conduct business in this state; whose address is false; and with whom Cohen ceased being employed two (2) years ago. Attached hereto and incorporated herein as Exhibit 12 are true and correct copies of Notices sent to Cohen by this Court for case numbers: 22-1155; 23-0125; and 21-0799.

Although Cohen updated his online attorney profile with the Texas Bar Association, some of his statements therein are materially false, while others are deceptive. At no time in the more than three and a half years that Cohen has been presenting as a sole practitioner has Cohen updated his online attorney profile with the Texas Bar Association to reflect the fact that he not only presents as a sole practitioner, but that he has also provided legal services as a sole practitioner for

more than three years while simultaneously being employed with companies and using their contact information to commit fraud. As the evidence has shown, in every communication and pleading, which Cohen filed on behalf of Hutson, he concealed the name of the companies with whom he was employed. He also concealed that the nature of his roles within said companies, which, at the very least, created a conflict of interest, and have caused interference or potential interference with the outcome of the legal proceedings in this case, the underlying trial court cause numbers and related trial court cause numbers, as well as, the related appeals in the Fifth District Court of Appeals,⁵⁷ and thus by causing injury or potential injury to D'Olivio as a party.

Cohen's Secret And Ex Part Communications With Officers Of The Court

Cohen and Court Coordinator, Charla Kiser's Secret And Ex Parte Communications With Court For Related Case (31-EV-20-00951)

As the preceding facts and evidence have shown, Cohen did not use the email addresses, which were associated with his places of employment in his communications and pleadings, which he filed on behalf of Hutson. Cohen did, however, use those emails in secret and ex parte communications with the officers

⁵⁷ See also D'Olivio's Motion For Permission To Extend Time To File Petition For Review, filed January 23, 2023.

of the court, and caused, at least, one other officer of the court, Charla Kiser, (“Kiser”), in the underlying trial court cause number to contact another court, wherein the related trial court cause number, (trl ct. no: 31-EV-20-00951; appeal no: 05-20-01118-CV) had an Order To Abate in place. In her email to the court in the related cause number, Kiser made misrepresentations as to the status of the underlying trial court cause number in order to convince the court in the related case to act in favor of, and in the best interest, of Hutson, thereby affecting the outcome of the case. The plenary power of court in the underlying trial court cause number had not yet expired. Almost immediately after Kiser’s email, the court in the related cause number acquiesced, foregoing its own order to abate pending resolution of the issue of forgery. In this instance, Cohen used the Michigan State University email address, but when it came time to inform Kiser of the name of the judge and which court the judge was presiding, Cohen, nor Kiser, included D’Olivio in said email exchanges. D’Olivio did not become aware of said secret email exchanges until after the court who acquiesced signed a final judgment against D’Olivio. Attached hereto and incorporated herein as Exhibit 13 is a true and correct copy of said Email exchanges.

Cohen And CEO of Pravati Capital LLC, Alexander Chucri Direct
The Judge And The Parties' Attorneys To Delete All Communications With Cohen

On November 22, 2021, the CEO of Pravati Capital, LLC, Alexander Chucri, (“Chucri”),⁵⁸ sent emails directly to assigned Judge Steve M. King and the attorneys in the pending probate Proceeding, as well as, to Julie C. Reedy, (“Reedy”), who was the appointed Temporary Guardian of the Person And Estate of Decedent in the Guardianship Proceeding. In said emails, Chucri directed Judge King and said attorneys to delete their communications to Cohen. In said emails, Chucri also cc'd Cohen using Cohen's email address with Pravati Capital, LLC, (cohen@pravaticapital.com). As an officer of the court, Cohen did not object to Chucri's directives to the Judge and the parties' attorneys to delete all of their communications with Cohen. In his silence, Cohen agreed with Chucri.

Where Chucri initiated said set of emails not only evidences the fact that, prior to sending said emails, Chucri not only had actual knowledge of each of their email addresses; had actual knowledge of the date, time and link for the scheduled hearing, but that there was also a relationship between Chucri and J. King and the attorneys, wherein Chucri, at the very least, exhibited a level of comfort in giving

⁵⁸ See within Exhibit 4.

them directives. Chucri's directive to delete their communications with Cohen would cause the record to be altered by deleting relevant records created during the proceedings.

Chucri's emails further evidence the fact that Chucri was attempting to influence the record, by having removed from the record their communications with Cohen, and thus, removing from the record Cohen's association with Pravati Capital LLC, and Pravati Capital LLC's surreptitious involvement and improper influence in the underlying trial court cause number and related cause numbers, and his readily apparent influence over J. King and the attorneys.

At no point did nor Cohen, nor J. King, nor any other attorney object to Chucri's directives to them. In fact, Reedy informed Chucri that she was obtaining a link to the hearing, which was scheduled for that day. This is despite the fact that Chucri is not an attorney, nor a party in the underlying trial court cause number, nor in any of the related trial court cause numbers, and further despite the fact, that Pravati Capital LLC is not a law firm; is not authorized to conduct business in the State of Texas; has no physical address in the State of Texas and is, in fact, is Headquartered in Arizona. Attached hereto and incorporated herein Exhibit 14, are

true and correct copies of Emails, dated November 22, 2021 and December 2, 2021.

Cohen's Secret Ex Parte Communications With Clerk Alexander Claycomb

On December 1, 2021, Clerk Claycomb sent an email to Cohen, wherein D'Olivio was not cc'd. Claycomb sent said email to Cohen using Cohen's email associated with his employment by Major, Lindsey, & Africa LLL. Said email is: brcohen@mlaglobal.com.⁵⁹

In his response email, wherein D'Olivio was cc'd, Cohen responded using the Michigan State University email address, (cohenbru@msu.edu), but only before he removed his email, (brcohen@mlaglobal.com). Attached hereto and incorporated herein as Exhibit 15, is a true and correct copy of said Email from Claycomb to Cohen via brcohen@mlaglobal.com, dated December 1, 2021, at 1:39pm; and Email from Cohen via cohenbru@msu.edu, dated December 1, 2021, at 2:14pm; p. 1.

The following facts evidence the fact that Cohen was secretly communicating ex parte with Claycomb via the email address, brcohen@mlaglobal.com *before* Claycomb sent said email to Cohen via brcohen@mlaglobal.com on December 1,

⁵⁹ See within Exhibit 7.

2021:

1. Cohen has never filed, nor served a Change of Address in the underlying trial court cause number, nor the related trial court cause numbers; nor the related appeals in the Fifth District Court Of Appeals, (05-20-00969-CV; 05-20-01118-CV; and 05-22-00768-CV), nor in this Court for any of the related cases pending before it, (22-1155; 23-0125; 21-0799);

2. As the preceding facts and evidence show, Cohen never used said email address, (brcohen@mlaglobal.com), which is Cohen's email address for his employment with Major, Lindsey & Africa LLC, in any pleading, nor in any correspondence, which he filed with any of the Courts for any of the above-referenced cases.

3. The docket sheet for the Supreme Court cause number, (21-0799) to which said email from Claycomb pertains, does not reference that any other emails were sent by Cohen to Claycomb or any Clerk of this Court as it relates to any cases pending before it, which would otherwise explain when, how and why Claycomb knew said email address, (brcohen@mlaglobal.com). Attached hereto and incorporated herein as Exhibit 16, is a true and correct copy of the Docket Sheet

for Supreme Court Of Texas case number 21-0799. Said case number arose from the related appeal, (05-20-01118-CV) in the Fifth District Court, and which is currently before this Court as case no: 23-0125.

On January 23, 2023, Claycomb again sent an email to Cohen at said email address, (brcohen@mlaglobal.com), wherein D’Olivio was not cc’d on said email. and again, Cohen responded to Claycomb email, wherein he used the Michigan State University email, (cohenbru@msu.edu), and cc’d D’Olivio, but, again, only before he removed said email, (brcohen@mlaglobal.com) from the email chain. See within Exhibit 15, Email, dated January 23, 2023, p. 2.

Upon information and belief, at least, one other Clerk of this Court has participated in the secret and ex parte communications with Cohen.

On January 25, 2023, D’Olivio filed a records request for records pertaining to the cases before it. In said records request, which was specific to the email communications by and between Cohen and any person/clerk of this Court, via said email, brcohen@mlaglobal.com.⁶⁰

As of this date, D’Olivio’s said record request, which was filed in this Court on

⁶⁰ See D’Olivio’s Correspondence To The Court, file-stamped, January 25, 2023.

January 25, 2023, has been ignored. By not responding to said request lends itself to the logical conclusion that secret ex parte communications via said email address, which have occurred, continue to occur, by and between Cohen and officers of this Court.

Cohen's Use Of His Employment Email Addresses To
Secretly Communicate With Other Officers Of The Court

Where the preceding facts and evidence have shown that Cohen concealed the email addresses associated with the companies with whom he was employed in throughout his representation of Hutson as a sole practitioner, and instead used the company email address to engage in ex parte communications with officers of the court, he has also used the company email addresses to secretly communicate with other officers of the court regarding the underlying trial court cause number and related cause numbers. Although Cohen's designated email address for e-file purposes is the Michigan State University email address, he has also included his company email addresses, which he uses solely to communicate with other officers of the court without providing a copy of the communications to D'Olivio. Attached

hereto and incorporated herein as Exhibit 17 is a true and correct copy of Cohen's use of his email address with Major, Lindsey & Africa, LLC, (brcohen@mglglobal.com); Pravati Capital LLC (cohen@pravaticapital.com) and Pepsico Inc, (bruce.cohen@pepsico.com), pp. 1-6.

Although every attorney associated with the underlying trial court cause number and related trial court cause numbers are aware that D'Olivio is not an e-filer, in order to make it appear that said communications were also sent to D'Olivio, her name is added to list of participants on the e-file list, all the while knowing that D'Olivio is not an-e-filer and therefore, would not receive the communications.

Cohen has also added D'Olivio's name and email address with EFSP without her knowledge and without her permission. When he was caught doing so, Cohen tried to claim that EFSP (Tyler Technologies) asked him for D'Olivio's name and email address. Not only was Cohen sent Cease And Desist letters for his unlawful use of D'Olivio's name and email address, but Tyler Technologies has also confirmed in writing that they do not ask for names and email addresses and that the only names that can be added to an e-file list are those names within that firm's

office. Cohen, however, has continued to engage in said unlawful conduct. See within Exhibit 17, true and correct copies of said Cease and Desist letters, and his emails from Tyler Technology, pp. 7-11.

As the preceding facts and evidence show, Cohen has consistently engaged in fraud and deception in order to gain a tactical advantage over D'Olivio, thereby causing injury to D'Oliivio. For all of the foregoing facts and evidence, D'Olivio respectfully requests that this Court impose the harshest penalties and dismiss, with prejudice, the underlying trial court cause number.

WHEREFORE, D'Olivio prays that this Court Grant, in its entirety, the within Motion To Stay Pending Determination Of Motion To Correct The Record And Motion To Dismiss The Underlying Trial Court Cause Number', and i) STAY this case and each of the underlying trial court cause numbers and the related appeals pending in the Fifth District Court of Appeals pending the consideration of the within motion; 2) order the clerk of the court to correct the record; 3: dismiss the underlying trial court cause number with prejudice and for whatever further relief this Court deem fair and just.

NO: 22-1155
IN THE SUPREME COURT OF TEXAS

Brigetta D'Olivio aka Brigetta Alix Anderson, Alix Brigetta,
Petitioner

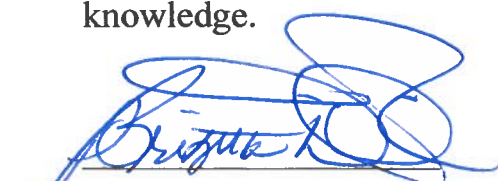
v

Hilary Thompson Hutson,
Respondent

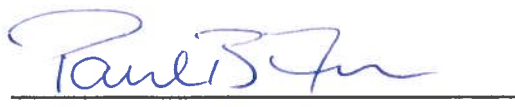
SWORN AFFIDAVIT

BEFORE ME, the undersigned, on this day personally appeared Brigetta D'Olivio. Known to me to be the person whose signature is set forth herein. My name is Brigetta D'Olivio. I am over 18 years of age. I am a resident of Collin County, TX and am fully competent to make this Affidavit and do solemnly swear that the facts stated in the foregoing "Motion To Stay Pending Consideration Of Motion To Correct The Record", are within my personal knowledge and the same are true and correct to the best of my knowledge.

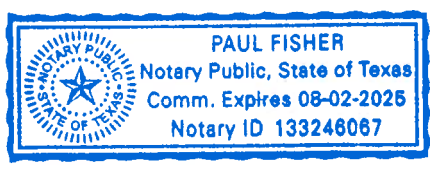
*MOTION TO STAY PENDING CONSIDERATION OF
AND MOTION TO DISMISS UNDERLYING
THAT COURT CASE NUMBER 11*


Brigetta D'Olivio
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
bdt2916@gmail.com

SUBSCRIBED and SWORN to before me,
the undersigned, on this 8th day of February 2023,
to certify which witness my hand and seal of office.



NOTARY PUBLIC
In and for the State of Texas



NO: 22-1155
IN THE SUPREME COURT OF TEXAS

Brigetta D'Olivio aka Brigetta Alix Anderson, Alix Brigetta,
Petitioner

v

Hilary Thompson Hutson,
Respondent

CERTIFICATE OF SERVICE

As required by the Texas Rules of Appellate Procedure 6.3 and 9.5, I certify that a copy of this "Motion To Stay Pending Consideration Of Motion To Correct The Record And Motion To Dismiss The Underlying Trail Court Cause Number", was served on Respondent, Hilary T. Hutson, through counsel of record, Bruce D. Cohen, at the last known address:

Pravati Capital LLC
Bruce D. Cohen
8117 Preston Rd., Suite 300
Dallas, TX 75225



Brigetta D'Olivio, Petitioner Pro Se
2916 Creekbend Dr.,
Plano, TX 75075
214-733-7204
bdt2916@gmail.com

NO: 22-1155
IN THE SUPREME COURT OF TEXAS

Brigetta D'Olivio aka Brigetta Alix Anderson, Alix Brigetta,
Petitioner

V

Hilary Thompson Hutson,
Respondent

CERTIFICATE OF CONFERENCE

I, Brigetta D'Olivio, certify that I have conferred, or made a reasonable attempt to confer with Bruce D. Cohen, counsel for Respondent, Hilary T. Hutson, regarding the foregoing Motion To Stay Pending Consideration Of Motion To Correct The Record And Motion To Dismiss Underlying Trial Court Cause Number.



Brigetta D'Olivio, Petitioner Pro Se
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
bdt2916@gmail.com

NO: 22-1155
IN THE SUPREME COURT OF TEXAS

Brigetta D'Olivio aka Brigetta Alix Anderson, Alix Brigetta,
Petitioner

V

Hilary Thompson Hutson,
Respondent

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 52.10 of the TEX. R. APP. P., D'Olivio Certifies that she notified and made a diligent effort to notify all parties by expedited means that a motion for temporary relief has been filed, and that notification was made by telephone to Respondent's attorney, Bruce D. Cohen



Brigetta D'Olivio, Petitioner Pro Se
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
bdt2916@gmail.com

EXHIBIT 1



January 24, 2023

Dear Customer,

The following is the proof-of-delivery for tracking number: 771089634273

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	A.COLCOMB	Delivery Location:	
Service type:	FedEx Priority Overnight		
Special Handling:	Deliver Weekday		AUSTIN, TX,
		Delivery date:	Jan 23, 2023 11:23

Shipping Information:

Tracking number:	771089634273	Ship Date:	Jan 21, 2023
		Weight:	7.0 LB/3.18 KG

Recipient:
AUSTIN, TX, US,

Shipper:
PLANO, TX, US,

Signature image is available. In order to view image and detailed information, the shipper or payor account number of the shipment must be provided.

Thank you for choosing FedEx

EXHIBIT 2



Brigetta D'Olivia-Thompson <bdt2916@gmail.com>

REPLY TO RESPONDENT'S RESPONSE 22-1155

Brigetta D'Olivia-Thompson <bdt2916@gmail.com>

Thu, Jan 26, 2023 at 8:52 PM

To: Alexander.claycomb@txcourts.gov

Cc: "Cohen, Bruce David" <cohenbru@msu.edu>

Dear Mr. Claycomb:

This is to inform you that this evening, January 26, 2023, I noticed on the [court portal](#) that Respondent's attorney, Bruce D. Cohen, filed a Response to the Motion For Permission To Extend Time To File Petition For Review. Despite Cohen's assertion that he served me said Response, I have not received any Response from Cohen, neither by "US Mail" nor via email.

This is to further inform you that I have sent a Reply via commercial carrier. FedEx is in the custody and control of said Reply. The expected date of delivery is Monday, January 30, 2023.

I am requesting that my Reply be included for review and forwarded to the sitting Justices before any decision on said Motion For Permission To Extend Time To File Petition For Review is made.

Cohen has been cc'd in this email and served said Reply.

I appreciate your time and consideration.

Respectfully Yours;
Brigetta D'Olivia

EXHIBIT 3

Bruce D. Cohen
Attorney-at-Law
7701 Legacy Drive
MC: 3A-130C
Plano, Texas 75024

July 20, 2019

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND U.S. MAIL, WITH COPY AFFIXED TO DOOR

Ms. Brigetta D'Olivio
a/k/a Alix Brigetta, a/k/a Brigetta A. Anderson
2916 Creekbend Drive
Plano, Texas 75075

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND U.S. MAIL

Ms. Brigetta D'Olivio
a/k/a Alix Brigetta, a/k/a Brigetta A. Anderson
3800 Pebblecreek Court, Apartment 120
Plano, Texas 75023

Re: Notice of Termination of Right to Occupy
2916 Creekbend Drive, Plano, Texas 75075 (the "Property")

Dear Ms. D'Olivio and all occupants:

Undersigned counsel represents Hilary Thompson Hutson in connection with the above-referenced matter.

As you are aware, Ms. Hutson is the owner of the Property, pursuant to an uncontested deed filed with the Clerk of Collin County on June 12, 2018, and by operation of law. Her exclusive right to such property as against any person claiming a possessory right through Richard W. Thompson, Jr., was confirmed by the late Mr. Thompson in proceedings before the Probate Court of Collin County, on May 6, 2019. There, Mr. Thompson conceded, *inter alia*, that he was in possession of the property solely pursuant to the surviving spouse life estate specified in Tex. Estates Code § 102.005. As this was the sole basis of his possession of the Property at the time of his passing, no further such right exists deriving from him, including such rights as would obtain for a person to whom he was married.

On behalf of Ms. Hutson, you are hereby notified that you are no longer an authorized occupant of the Property. As such, you are instructed to vacate the Property within five (5) days of this

Ms. Brigetta D'Olivio
July 20, 2019
Page 2

notice, on or before July 25, 2019.

If you fail to vacate the Property in accordance with this notice, Ms. Hutson will proceed with all rights and remedies pursuant to the Texas Property Code for possession of the Property including, *inter alia*, securing a forcible detainer eviction judgment against you. In the event that such proceeding is instituted due to your failure to vacate the Property, any damage to the Property, or removal of personalty belonging to Ms. Hutson or Mr. Thompson's Estate from the Property during this notice period, you may also be liable for damages, attorneys' fees, interest and costs of court.

Take notice and govern yourself accordingly.

Very truly yours,



Bruce D. Cohen

cc: Ms. Hilary Thompson Hutson
Erin Peirce, Esq.
Lauren Olson, Esq.

Filing reviewed on 7/26/2019 by Brooke Wiggins

Court Date 8-15-19 C 10:00 am

Received 7/25/2019 4:33 PM Judge Chuck Ruckel - Precinct 3.1 Collin County, Texas

CASE NO. (court use only) 31-EV-19-02201

PETITION: EVICTION CASE

With suit for Rent

In the Justice Court, Precinct 3-1 Collin County, Texas

PLAINTIFF Hilary Thompson Hutson (Landlord/Property Name) VS. DEFENDANT(S): BRIGETTA D'OLIVIO

Table with 2 columns: Rental Subsidy (if any), Tenant's Portion, TOTAL MONTHLY RENT. Values: 0, \$0.00

and all other occupants. COMPLAINT: Plaintiff (Landlord) hereby complains of the defendant(s) named above for eviction of plaintiff's premises (including storerooms and parking areas) located in the above precinct. Address of the property is:

2916 CREEKBEND DRIVE Plano TX 75075

Street Address Unit No. (if any) City State Zip

1. SERVICE OF CITATION: Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other addresses where the defendant(s) may be served are: BRIGETTA D'OLIVIO, 3800 Pebblecreek Court, Apartment 120, Plano, TX 75023

2. UNPAID RENT AS GROUNDS FOR EVICTION: Defendant(s) failed to pay rent for the following time period(s): TOTAL DELINQUENT RENT AS OF DATE OF FILING IS: Plaintiff reserves the right to orally amend the amount at trial to include rent due from the date of filing through the date of trial.

3. OTHER GROUNDS FOR EVICTION/LEASE VIOLATIONS: Lease Violations (if other than non-paid rent - list lease violations) TENANT WAS AT SUFFERANCE DURING LIFE ESTATE OF PRECEDING OCCUPANT, WHO IS DECEASED SURV. SPOUSE MAY NOT EXERCISE SUBSEQUENT LIFE ESTATE.

4. HOLDOVER AS GROUNDS FOR EVICTION: Defendant(s) are unlawfully holding over since they failed to ... the rental term or renewal of extension period, which was the ... day of ...

5. NOTICE TO VACATE: Plaintiff has given defendant(s) a written notice to vacate (according to Chapter 24.005 of the Texas Property Code) and demand for possession. Such notice was delivered on 7/20/2019 and delivered by this method: CERTIFIED AND REGULAR MAIL, PLUS DOOR NOTICE

6. ATTORNEY'S FEES: Plaintiff will be or will NOT be seeking applicable attorney's fees. Attorney's name, address, and phone & fax numbers are: Bruce D Cohen Esq, 7701 Legacy Drive, MC 3A-130C Plano, TX 75024 Phone: 972-334-2260

7. BOND FOR POSSESSION: If Plaintiff has filed a bond for possession, plaintiff requests (1) that the amount of plaintiff's bond and defendant's counter bond be set, (2) that plaintiff's bond be approved by the Court, and (3) that proper notices as required by the Texas Justice Court Rules are given to Defendant(s).

REQUEST FOR JUDGMENT: Plaintiff prays that defendant(s) be served with citation and that plaintiff have judgment against defendant(s) for: possession of premises, including removal of defendants and defendants' possessions from the premises, unpaid rent IF set forth above, attorney's fees, court costs, and interest on the above sums at the rate stated in the rental contract, or if not so stated, at the statutory rate for judgments.

I give my consent for the answer and any other motions or pleadings to be sent to my email address which is: bruce.cohen@pepsico.com

My name is: Bruce Cohen

DEFENDANT(S) INFORMATION (if known): Defendant Name: Phone Number, DOB, Last 3 Numbers of DL, Last 3 Numbers of SSN

My date of birth is: 09/14/1961 My address is: 7701 Legacy Drive, MC 3A-130C Plano, TX 75024 U.S.A.

BRIGETTA D'OLIVIO 214-733-7204 1961-04-25

I declare under penalty of perjury, pursuant to the law of the State of Texas, that all information provided is true and correct.

/s/ Bruce D Cohen Esq (Signature of Plaintiff (Landlord/Property Owner) or Agent) Executed in Collin County, Texas on 7/25/2019 Phone: 972-334-2260

Respectfully submitted,

LEU & PEIRCE, PLLC



Lori A. Leu
State Bar No. 12243550
llei@leulawfirm.com
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
Laura J. Chavero
State Bar No. 24091221
lchavero@leulawfirm.com
Zachary Stubblefield
State Bar No. 24110420
zstubblefield@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

/s/ Bruce D. Cohen

Bruce D. Cohen
State Bar No. 24014866
7701 Legacy Drive
MC: 3A-130C
Plano, Texas 75024
Bruce.Cohen@pepsico.com

**ATTORNEYS FOR APPLICANT
HILARY THOMPSON HUTSON**

**APPLICATION TO PROBATE WILL NOT BE PRODUCED
IN OPEN COURT AND FOR ISSUANCE OF LETTERS TESTAMENTARY**

Page 5



TRUE AND CORRECT COPY
OF ORIGINAL INSTRUMENT AS
FILED IN COLLIN COUNTY
CLERKS OFFICE

296TH JUDICIAL DISTRICT COURT

DOCKET SHEET

CASE NO. 296-04855-2019

**Hilary Thompson Hutson vs. Brigetta D'Olivio a/k/a
Brigetta Alix Anderson, Alix Brigetta**

§
§
§
§
§

Location: **296th District Court**
Judicial Officer: **Roach, John R., Jr.**
Filed on: **08/28/2019**
Appeal: **05-20-00969-CV**

CASE INFORMATION

Related Cases

002-02704-2020 (Related Case)
296-05192-2019 (Same Plaintiff)

Case Type: **Other Real Property**

Case Flags: **Appeal Filed - Don't Expunge
Case or Records**

Statistical Closures

08/11/2020 Summary Judgment Disposing of Cases

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	296-04855-2019
Court	296th District Court
Date Assigned	08/28/2019
Judicial Officer	Roach, John R., Jr.

PARTY INFORMATION

Plaintiff

Hutson, Hilary Thompson

Lead Attorneys

Cohen, Bruce D
Retained
214-613-3726(W)

Defendant

D'Olivio, Brigetta

Pro Se
214-733-7204(H)

DATE

EVENTS & ORDERS OF THE COURT

INDEX

08/28/2019  Plaintiff's Original Petition (OCA) \$313.00
Petition of Plaintiff


08/30/2019  Letter
Request for Issuance

08/30/2019 Request for Citation \$8.00

08/30/2019 **Citation**
 D'Olivio, Brigetta served 09/03/2019

08/30/2019 Constable Service Fee #3, \$75.00

09/05/2019  Constable Service Return
Citation - Brigetta D'Olivio

09/20/2019  Original Answer
Defendant's Original Answer
Party: Defendant D'Olivio, Brigetta

10/04/2019  Motion to Withdraw

Respectfully submitted,

/s/ Bruce D. Cohen

Bruce D. Cohen
Texas Bar No 24014866
MC 3A-130C
7701 Legacy Drive
Plano, Texas 75024
(972) 334-2260
cohenbru@msu.edu

LEU & PEIRCE, PLLC




Lori A. Leu
State Bar No. 12243550
lleu@leulawfirm.com
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
Laura J. Chavero
State Bar No. 24091221
lchavero@leulawfirm.com
Zachary Stubblefield
State Bar No. 24110420
zstubblefield@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

**ATTORNEYS FOR PLAINTIFF
HILARY THOMPSON HUTSON**

This 15th day of November, 2019.

Respectfully submitted,


Bruce D. Cohen
Texas Bar No 24014866
MC 3A-130C
7701 Legacy Drive
Plano, Texas 75024
(972) 334-2260
cohenbru@msu.edu

LEU & PEIRCE, PLLC


Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

**ATTORNEYS FOR PLAINTIFF
HILARY THOMPSON HUTSON**

This 20th day of November, 2019.

Respectfully submitted,



Bruce D. Cohen
Texas Bar No 24014866
MC 3A-130C
7701 Legacy Drive
Plano, Texas 75024
(972) 334-2260
cohenbru@msu.edu

LEU & PEIRCE, PLLC



Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

**ATTORNEYS FOR PLAINTIFF
HILARY THOMPSON HUTSON**

EXHIBIT 4

The accomplished new additions bring a wealth of knowledge in areas such as debtor-in-possession financing, complex litigation and commercial litigation, and will help steer and strengthen the firm's plans for growth, while expanding its footprint to key markets including New York, Los Angeles and Dallas. As Pravati Capital continues to grow and scale, the strategy will remain on developing attractive alternative investment funds that offer solid returns at a low risk given that assets are not related to the economic cycle. The established focus combined with the specialized experience will allow the industry leader to explore new and existing opportunities within the dynamic and growing field.

"We are thrilled to welcome these accomplished individuals and look forward to the value they will add to our insight and practice," said Alex Chucri, CEO at Pravati Capital. "Our clients are our top priority and we are confident these additions will enhance our company as we continue to grow and offer exceptional service as we expand our practice of finance litigation."

New additions to Pravati Capital's leadership includes:

Pravati Capital welcomes **Bruce Cohen as Director of Business Development** in the Dallas office. Cohen's 30 years of well-rounded background add extreme value to the firm and his past positions include Senior Legal Director at PepsiCo, Inc., where he was responsible for sales and antitrust matters in its Frito-Lay subsidiary and Associate General Counsel of Verizon Communications Inc. A former U.S. Army Field Artillery Officer, he is a Distinguished Graduate with Honors of the Virginia Military Institute and received his Juris Doctor summa cum laude from the University of Georgia School of Law. Cohen was a litigation partner at a prominent Atlanta law firm and has appeared in trials, regulatory proceedings and appeals in over three dozen states. He holds advanced degrees in history and law from Michigan State, the University of North Texas, and King's College London. He previously served as a Special Assistant to the Attorney General of Texas, and as a judicial law clerk for a judge of the United States Court of Appeals for the Fifth Circuit.



"I've really enjoyed the challenge of learning about litigation finance and explaining it to law firms and legal departments, many of whom really didn't know it existed, let alone the ways it could help their practice and their teams," said Cohen. "It's still a nascent business in many respects, and I look forward to helping it grow."

- Bruce Cohen

Doug Smith serves as Senior Commercial Lending Advisor in the Scottsdale, AZ office. With a 30-year background managing corporate and commercial real estate lending, Smith focused primarily on structured finance transactions, Debtor-In-Possession bankruptcy restructuring, and distressed loan portfolios. Prior to the private sector, he worked for Congressman John Rhodes, Minority Leader of the U.S. House of Representatives during the Carter and Reagan administrations. Currently, he is a member of the Arizona board of directors for a commercial bank and President of the private non-profit Phoenician II Foundation. In the past, he has served as a member of the Board of Directors for the Maricopa County Industrial Development Authority, the Board of Directors for the Arizona Chamber of Commerce, the Maricopa County Community Development Advisory Committee and the Arizona Republican Party Finance Committee.

 Doug Smith

"The economy is experiencing major dislocation and businesses will need debtor-in-possession and debt restructuring services for some time to come," said Smith. "Pravati is uniquely positioned to provide these financial services in an efficient and creative manner to middle market enterprises."

This website uses cookies to improve your experience. By browsing this website, you agree to our use of cookies. [Cookie settings](#)

ACCEPT

DO NOT WRITE ABOVE THIS LINE; RESERVED FOR ACC USE ONLY.

**APPLICATION FOR REGISTRATION
OF FOREIGN LIMITED LIABILITY COMPANY**

Please read Instructions L025i

1. **ENTITY TYPE** – check only one to indicate the type of entity applying for registration:

LIMITED LIABILITY COMPANY

PROFESSIONAL LIMITED LIABILITY COMPANY

2. **NAME IN STATE OR COUNTRY OF FORMATION (FOREIGN NAME)** – enter the exact, true name of the foreign LLC:

PRAVATI CAPITAL, LLC

3. **NAME TO BE USED IN ARIZONA (ENTITY NAME)** – identify the name the foreign LLC will use in Arizona by checking 3.1 or 3.2 (check only one), and follow instructions:

3.1 **Name in state or country of formation**, with no changes or additions – go to number 4 and continue.

3.2 **Fictitious name** – check this if the foreign LLC's name in its state or country of formation is not available for use in Arizona or if that name does not contain an LLC identifier, and enter the name in number 3.3 below. **NOTE** – a resolution of the company adopting the fictitious name must be attached to and submitted with this form.

3.3 **If you checked 3.2**, enter or print the name to be used in Arizona:

4. **PROFESSIONAL LIMITED LIABILITY COMPANY SERVICES** – if professional LLC is checked in number 1 above, describe the professional services that the professional LLC will provide (examples: law firm, accounting, medical):

5. **FOREIGN DOMICILE** – list the state or country in which the foreign LLC was formed:

Delaware

6. **DATE OF FORMATION IN FOREIGN DOMICILE:** 10/03/2013

7. **PURPOSE OR GENERAL CHARACTER OF BUSINESS** – describe or state the purpose of the foreign LLC or the general character of the business it proposes to transact in Arizona:
ANY LEGAL PURPOSE

8. STATUTORY AGENT IN ARIZONA:					
8.1 REQUIRED - give the name (can be an individual or an entity) and physical or street address (not a P.O. Box) in Arizona of the statutory agent:			8.2 OPTIONAL - Mailing address in Arizona of statutory agent, if different from street address (can be a P.O. Box):		
HLG CORPORATE SERVICES, LLC <small>Statutory Agent Name (required)</small>					
<small>Attention (optional)</small> 2398 E. CAMELBACK RD., SUITE 1020			<small>Attention (optional)</small>		
<small>Address 1</small>			<small>Address 1</small>		
<small>Address 2 (optional)</small> City PHOENIX		<small>State</small> AZ	<small>Zip</small> 85016	<small>Address 2 (optional)</small> City	
		<small>State</small>	<small>Zip</small>		
8.3 REQUIRED - the <u>Statutory Agent Acceptance</u> form M002 must be submitted along with this Application For Registration.					

9. PRINCIPAL OFFICE ADDRESS - FOREIGN DOMICILE STREET ADDRESS - *see Instructions L025i* - give the **physical or street address** (not a P. O. Box) of the foreign LLC required to be maintained in its state of organization, or, if not so required, of the foreign LLC's statutory agent in its state or country of organization:

<small>Attention (optional)</small> 108 WEST 13TH STREET		
<small>Address 1</small>		
<small>Address 2 (optional)</small> WILMINGTON		<small>State or Province</small> DE
<small>City</small>	<small>State or Province</small>	<small>Zip</small> 19801
<small>Country</small> UNITED STATES		

10. OPTIONAL - ARIZONA KNOWN PLACE OF BUSINESS ADDRESS:

10.1 Is the Arizona known place of business street address the same as the **street address** of the statutory agent? Yes - go to the next page and continue.
 No - complete number 10.2 and continue.

10.2 If you answered "no" to number 10.1, give the physical or street address (not a P.O. Box) of the known place of business of the LLC in Arizona:

<small>Attention (optional)</small> 7154 E. STETSON DRIVE, SUITE 210		
<small>Address 1</small>		
<small>Address 2 (optional)</small> SCOTTSDALE		<small>State or Province</small> AZ
<small>City</small>	<small>State or Province</small>	<small>Zip</small> 85251
<small>Country</small> UNITED STATES		

COMPLETE NUMBER 11 OR NUMBER 12 – NOT BOTH.

11. MANAGER-MANAGED LLC – see *Instructions L025i* – check this box if management of the LLC is vested in a manager or managers, and complete and attach the Manager Structure Attachment form L040. *The filing will be rejected if it is submitted without the attachment.*

12. MEMBER-MANAGED LLC – see *Instructions L025i* – check this box if management of the LLC is reserved to the members, and complete and attach the Member Structure Attachment form L041. *The filing will be rejected if it is submitted without the attachment.*

13. SIGNATURE: By checking the box marked "I accept" below, I acknowledge *under penalty of law* that this document together with any attachments is submitted in compliance with Arizona law.

I ACCEPT

Alexander Chucri

ALEXANDER CHUCRI

12/4/2018

Signature

Printed Name

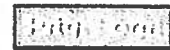
Date

REQUIRED – check only one and fill in the corresponding blank if signing for an entity:

<input checked="" type="checkbox"/> I am the individual Manager of this manager-managed LLC or I am signing for an entity manager named: Arbitrage Capital Ventures, LLC	<input type="checkbox"/> I am a Member of this member-managed LLC or I am signing for an entity member named:	<input type="checkbox"/> I am a duly authorized agent for this LLC.
---	---	--

Filing Fee: \$150.00 (regular processing) Expedited processing – add \$35.00 to filing fee. All fees are nonrefundable - see Instructions.	Mail: Arizona Corporation Commission - Corporate Filings Section 1300 W. Washington St., Phoenix, Arizona 85007 Fax: 602-542-4100
--	---

Please be advised that A.C.C. forms reflect only the minimum provisions required by statute. You should seek private legal counsel for those matters that may pertain to the individual needs of your business. All documents filed with the Arizona Corporation Commission are public record and are open for public inspection. If you have questions after reading the instructions, please call 602-542-3026 or (within Arizona only) 800-345-5819.



DO NOT WRITE ABOVE THIS LINE; RESERVED FOR ACC USE ONLY.

MANAGER STRUCTURE ATTACHMENT

- ENTITY NAME** – give the exact name of the LLC (foreign LLCs – give name in domicile state or country):
PRAVATI CAPITAL, LLC
- A.C.C. FILE NUMBER** (if known): _____
Find the A.C.C. file number on the upper corner of filed documents OR on our website at: <http://www.azcc.gov/Divisions/Corporations>
- Check one box only to indicate what document the Attachment goes with:**
 Articles of Organization Articles of Amendment
 Application for Registration Articles of Amendment to Application for Registration
- MANAGERS / MEMBERS** – give the name and address of each and every **manager** and list all **members who own 20% or more** of the profits or capital of the LLC. Members who own less than 20% may also be listed, but it is not required. Check the appropriate box or boxes below each person listed – *do not check both member boxes*. If more space is needed, use another Manager Structure Attachment form.

ARBITRAGE CAPITAL VENTURES, LLC					
Name			Name		
7154 E. STETSON DR., SUITE 210					
Address 1			Address 1		
Address 2 (optional)			Address 2 (optional)		
SCOTTSDALE	AZ	85251			
City	State or Province	Zip	City	State or Province	Zip
UNITED STATES					
Country	<input checked="" type="checkbox"/> 20% or more member		Country	<input type="checkbox"/> 20% or more member	
<input checked="" type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member		<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	
Name			Name		
Address 1			Address 1		
Address 2 (optional)			Address 2 (optional)		
City	State or Province	Zip	City	State or Province	Zip
Country	<input type="checkbox"/> 20% or more member		Country	<input type="checkbox"/> 20% or more member	
<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member		<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	
Name			Name		
Address 1			Address 1		
Address 2 (optional)			Address 2 (optional)		
City	State or Province	Zip	City	State or Province	Zip
Country	<input type="checkbox"/> 20% or more member		Country	<input type="checkbox"/> 20% or more member	
<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member		<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	

DO NOT WRITE ABOVE THIS LINE; RESERVED FOR ACC USE ONLY.

STATUTORY AGENT ACCEPTANCE

Please read Instructions MQ02i

- 1. **ENTITY NAME** – give the exact name in Arizona of the corporation or LLC that has appointed the Statutory Agent:

Pravati Capital, LLC

- 2. **A.C.C. FILE NUMBER** (if entity is already incorporated or registered _____
Find the A.C.C. file number on the upper corner of filed documents OR on our website at: <http://www.azcc.gov/Divisions/Corporations>

- 3. **STATUTORY AGENT NAME** – give the exact name of the Statutory Agent appointed by the entity listed in number 1 above (this will be *either* an individual or an entity):

HLG Corporate Services, LLC

- 3.1 Check one box:**
- The statutory agent is an **Individual** (natural person).
 - The statutory agent is an **Entity**.

STATUTORY AGENT SIGNATURE:

By the signature appearing below, the individual or entity named in number 3 above accepts the appointment as statutory agent for the entity named in number 1 above, and acknowledges that the appointment is effective until the entity replaces the statutory agent or the statutory agent resigns, whichever occurs first.

By checking the box marked "I accept" below, I acknowledge *under penalty of perjury* that this document together with any attachments is submitted in compliance with Arizona law.

I ACCEPT

Signature

Michael D. Hool, Manager

Printed Name

12/4/2018

Date

REQUIRED – check only one:

<input type="checkbox"/> Individual as statutory agent: I am signing on behalf of myself as the individual	<input checked="" type="checkbox"/> Entity as statutory agent: I am signing on behalf of the entity named as statutory agent, and I am authorized to act for that entity.
---	--

Filing Fee: none (regular processing) Expedited processing – add \$35.00 to filing fee. All fees are nonrefundable - see Instructions.	Mail: Arizona Corporation Commission – Corporate Filings Section 1300 W. Washington St., Phoenix, Arizona 85007 Fax: 602-542-4100
--	---

Please be advised that A.C.C. forms reflect only the minimum provisions required by statute. You should seek private legal counsel for those matters that may pertain to the individual needs of your business.
All documents filed with the Arizona Corporation Commission are public record and are open for public inspection.
If you have questions after reading the Instructions, please call 602-542-3026 or (within Arizona only) 800-345-5819.

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "PRAVATI CAPITAL, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FOURTH DAY OF DECEMBER, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "PRAVATI CAPITAL, LLC" WAS FORMED ON THE THIRD DAY OF OCTOBER, A.D. 2013.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.



A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

5409447 8300

SR# 20187955213

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 204020830

Date: 12-04-18

Q Taxable Entity Search

 Business Name pravati capital was not found.

Search	
Tax ID	
Use the 11-digit Comptroller's Taxpayer Number or the 9-digit Federal Employer's Identification Number.	
Entity Name	
pravati capital	
File Number	
Use the File Number assigned by the Texas Secretary of State.	
<input type="checkbox"/>	I'm not a robot
	reCAPTCHA Privacy - Terms

BRIGETTA D'OLIVIO
2916 CREEKBEND DR,
PLANO, TX 75075
214-733-7204
bdt2916@gmail.com

DECEMBER 1, 2021

VIA FACSIMILE TRANSMISSION
512-463-5709

Texas Secretary of State
c/o Custodian of Records
Corporations Section
1019 Brazos St
Austin, TX 78701

RE: Texas Public Information Act, Gov't Code §552.001 et seq

Dear Custodian Of Records:

Under the Texas Public Information Act, Tex. Gov't Code §552.001 et seq., I am requesting copies of public records the following records:

1. Any and all filings for the business entity: **Pravati Capital LLC**

If there are any fees for searching or copying these records, please inform me of such and I will remit immediately. This information is not being sought for commercial purposes. The Texas Public Information Act requires that you "promptly produce" the requested records unless, within 10 days, you have sought an Attorney General's Opinion. If you expect a significant delay in responding to this request, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, for each such denial please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

If you seek an Opinion from the Attorney General, please forward a copy of said request to me at the time said request is made. For your convenience, feel free to email the above-referenced records requests to my email: bdt2916@gmail.com. Thank you for considering my request and I look forward to hearing from you promptly.

Sincerely,


Brigetta D'Olivio

TRANSMISSION VERIFICATION REPORT

TIME : 12/01/2021 18:32
NAME : THE UPS STORE
FAX : 9726122402
TEL : 9725960047
SER. # : U63274A3J332505

DATE, TIME	12/01 18:31
FAX NO./NAME	15124635709
DURATION	00:00:24
PAGE(S)	01
RESULT	OK
MODE	STANDARD ECM

Compose

Inbox 1,227

Starred

Snoozed

Sent

Drafts 17

More

Labels

On Mon, Dec 20, 2021 at 11:17 AM Je Taimé Swindell <JSwindell@sos.texas.gov> wrote:

Brigetta,

Thank you for your patience.

REDACTED

submitter "Pravati Capital LLC" and there have been no filings submitted to this office under this name.

A search

Please let me know if you have any questions.

Kind Regards,
Je T'aime F. Swindell
Attorney, Business & Public Filings Division
Office of the Texas Secretary of State
<https://www.sos.state.tx.us>

SOSDirect: <https://www.sos.texas.gov/corp/sosda/index.shtml>

SOSUpload: <https://direct.sos.state.tx.us/lef/index.aspx>

Business Filing Tracker: <https://webservices.sos.state.tx.us/filing-status/status.aspx>

This email provides general answers to the questions raised, is not intended as legal advice and does not establish an attorney-client advice specific to your circumstances.

EXHIBIT 5

Call us at 1-844-772-8284

CORPORATE HEADQUARTERS

7154 E. Stetson Drive, Suite 210
Scottsdale, AZ 85251

NEW YORK OFFICE

445 Park Ave, Suite 919
New York, NY 10022

PRAVATI CAPITAL

8117 Preston Road, Suite 300
Dallas, TX 75225

This website uses cookies to improve your experience. By browsing this website, you agree to our use of cookies. [Cookie settings](#)

ACCEPT

< PREV matches 1 - 10 of 55 properties.					Page 1 of 6
#	Property Address	City	Owner Name / Business Name	Total Value	Type
1		DALLAS	MOBILITIE MANAGEMENT LLC DBA: MOBILITIE MANAGEMENT LLC	\$14,820	BPP
2		DALLAS	STEEL KATHID DDS MS PA DBA: KATHID STEEL DDS MS PA	\$51,320	BPP
3		DALLAS	B P CAPITAL LP DBA: B P CAPITAL LP	\$210,060	BPP
4		DALLAS	JAMIESON MAUREEN DC DBA: HEALTHCORE CHIROPRACTIC WELLNESS C	\$1,210	BPP
5		DALLAS	CLEAN ENERGY CORP DBA: CLEAN ENERGY CORP	\$2,631,420	BPP
6		DALLAS	VRX GLOBAL DBA: VRX GLOBAL	\$1,280	BPP
7		DALLAS	BARTA JONNA LEE DBA: BARTA JONNA LEE	\$4,810	BPP
8		DALLAS	THAYER LANCE DBA: THAYER WEALTH MANAGEMENT	\$2,710	BPP
9		DALLAS	KESSLER STEVE DBA: KESSLER & KORBY PC	\$130	BPP
10		DALLAS	REZAI MARYAM DBA: MARYAM REZAI MD	\$2,460	BPP
< PREV matches 1 - 10 of 55 properties.					Page 1 of 6

matches 11 - 20 of 55 properties.					Page 2 of 6
#	Property Address	City	Owner Name / Business Name	Total Value	Type
11		DALLAS	REMINGTON PARTNERS INC DBA: REMINGTON PARTNERS	\$380	BPP
12		DALLAS	POE JACK CO INC DBA: POE JACK CO INC	\$350	BPP
13		DALLAS	ROSENBERG M SUSAN DBA: M SUSAN ROSENBERG LCSW	\$7,180	BPP
14		DALLAS	REGUS MANAGEMENT GROUP LLC DBA: REGIS MANAGEMENT GROUP	\$213,460	BPP

15		DALLAS	CUMBERLAND TRUST & INVESTMENT CO DBA: CUMBERLAND TRUST & INVESTMENT CO	\$210	BPP
16		DALLAS	AMUSA DBA: AMUSA	\$10	BPP
17		DALLAS	BEUCLER PROPERTIES LP DBA: BEUCLER PROPERTIES LP	\$4,050	BPP
18		DALLAS	MR CAPITAL DBA: MR CAPITAL	\$400	BPP
19		DALLAS	CHAD M RUBACK ATTORNEY AT LAW DBA: CHAD M RUBACK ATTORNEY AT LAW	\$1,000	BPP
20		DALLAS	CLEMENS LEE DBA: LAW OFFICE OF LEE CLEMENS	\$200	BPP
matches 11 - 20 of 55 properties.					

matches 21 - 30 of 55 properties.					Page 3 of 6
#	Property Address	City	Owner Name / Business Name	Total Value	Type
21		DALLAS	DILLCO INC DBA: DILLCO INC	\$480	BPP
22		DALLAS	EVANS & DAVIS PLLC DBA: EVANS & DAVIS PLLC	\$10	BPP
23		DALLAS	FIRST BUSINESS RESOURCES DBA: FIRST BUSINESS RESOURCES	\$4,000	BPP
24		DALLAS	GENERAL INSURANCE BROKERAGE LLC DBA: GENERAL INSURANCE BROKERAGE LLC	\$100	BPP
25		DALLAS	GIVEBACK CAMPAIGN DBA: GIVEBACK CAMPAIGN	\$490	BPP
26		DALLAS	GREER AND SHROPSHIRE DBA: GREER AND SHROPSHIRE	\$620	BPP
27		DALLAS	HENSCH CARL DBA: CARL HENSCH ATTORNEY AT LAW	\$100	BPP

28		DALLAS	JAGGI LEWIS DBA: JAGGI LEWIS	\$6,080	BPP
29		DALLAS	JOHN HENRY PETROLEUM DBA: JOHN HENRY PETROLEUM	\$130	BPP
30		DALLAS	KLINE & KLINE DBA: KLINE & KLINE	\$60	BPP
matches 21 - 30 of 55 properties.					Page 3 of 6

matches 31 - 40 of 55 properties.					Page 4 of 6
#	Property Address	City	Owner Name / Business Name	Total Value	Type
31		DALLAS	PETICOLAS LAW FIRM PLLC DBA: PETICOLAS LAW FIRM PLLC	\$50	BPP
32		DALLAS	PINNACLE DBA: PINNACLE	\$4,320	BPP
33		DALLAS	REWAVE HARD DRIVE RECOVERY LLC DBA: REWAVE HARD DRIVE RECOVERY LLC	\$4,260	BPP
34		DALLAS	SENIOR HELPERS DBA: SENIOR HELPERS	\$20	BPP
35		DALLAS	SEARIGHT WILLIAM DBA: SEARIGHT WILLIAM	\$400	BPP
36		DALLAS	STRENGTHS ZONE INC DBA: STRENGTHS ZONE INC	\$10	BPP
37		DALLAS	TRU CONSENT DBA: TRU CONSENT	\$10	BPP
38		DALLAS	NAFTALIS RECRUITS INC DBA: COUNSEL SOURCE	\$65,210	BPP
39		DALLAS	OGLETREE DEAKINS NASH SMOAK & STEWART PC DBA: OGLETREE DEAKINS NASH SMOAK & STEW	\$94,230	BPP
40		DALLAS	ARTHUR J GALLAGHER RISK MGMT SERVICES DBA: ARTHUR J GALLAGHER RISK MGMT SERVI	\$37,820	BPP

matches 31 - 40 of 55 properties.	Page 4 of 6
-----------------------------------	-------------------

matches 41 - 50 of 55 properties.					Page 5 of 6
#	Property Address	City	Owner Name / Business Name	Total Value	Type
41		DALLAS	TUBULAR SYNERGY GROUP LP DBA: TUBULAR SYNERGY GROUP LP	\$139,230	BPP
42		DALLAS	CORRIGAN GODDARD FAMILY OFFICE DBA: CORRIGAN GODDARD FAMILY OFFICE	\$108,610	BPP
43		DALLAS	SNOWCAP CAPITAL MGMT LLC DBA: SNOWCAP CAPITAL MGMT LLC	\$1,960	BPP
44		DALLAS	SILVERMAN GOODWIN LLP DBA: SILVERMAN GOODWIN LLP	\$18,480	BPP
45		DALLAS	ROBERTSON OPPORTUNITY CAPITAL DBA: ROBERTSON OPPORTUNITY CAPITAL	\$94,420	BPP
46		DALLAS	SWALES STEPHANIE DBA: STEPHANIE SWALES PHD	\$320	BPP
47		DALLAS	BARNES C GARY DBA: BARNES C GARY PHD	\$450	BPP
48		DALLAS	SIMONS C ANN DBA: SIMONS C ANN MA LPC	\$650	BPP
49		DALLAS	ALBRITTON BENJAMIN J DBA: ALBRITTON BENJAMIN J PSY D	\$570	BPP
50		DALLAS	JONES FRENCH DBA: FRENCH JONES & ASSOC	\$3,550	BPP
matches 41 - 50 of 55 properties.					Page 5 of 6

matches 51 - 55 of 55 properties. NEXT >	Page 6 of 6
--	-------------

#	Property Address	City	Owner Name / Business Name	Total Value	Type
51		DALLAS	FALWELL SALLY PHY D DBA: SALLY FALWELL PHY D	\$20	BPP
52		DALLAS	EDWARD JONES & CO LP DBA: EDWARD JONES	\$8,510	BPP
53		DALLAS	OCC MD GROUP PA DBA: OCC MD GROUP PA	\$62,340	BPP
54		DALLAS	QUEST CAPITAL MANAGEMENT INC DBA: QUEST CAPITAL MANAGEMENT INC	\$92,390	BPP
55		DALLAS	APOGEE PHYSICIANS DBA: APOGEE PHYSICIANS	\$170,780	BPP
matches 51 - 55 of 55 properties. NEXT >					Page 6 of 6

NAVIGATION LINKS

- Annual Report
- + About DCAD
- + Search Appraisals
 - By Owner
 - By Account
 - By Address
 - By Business
- Find Property on Map
- Forms
- Data Products
- Open Records
- GIS Data Products
- Exemptions
- Property Valuation Process
- Protest Process
- Paying Taxes
- Local Tax Offices
- Taxing Unit Rates
- F.A.Q.
- Calendar
- Certified Value Summaries
- Certified Comparisons
- Certification Reports
- Preliminary Comparisons
- Average SFR Values
- Reappraisal Plan
- Water & Electricity Usage
- + Administration
- + Human Resources
- Links
- Contact Us

Find Property By Street Address

Search By: Owner Name Account Number Street Address Business Name
Map

Address Number	Direction	Street Name (required)	
<input type="text" value="8117"/>	▼	PRESTON	
Building	Suite	City	
	300	[ALL] ▼	

- Account Type**
- RESIDENTIAL
 - COMMERCIAL
 - BPP

Address Number Range Search

From To Search

Hints:

- Do not enter the street type such as Street, Drive or Lane.
- To find a single address, fill in one Address Number field. To find a range of addresses, fill in both.
- If no results are found, try entering less information.
- Use % as a wildcard. For example, %oak in the street name to find all streets with "oak" somewhere in the name.
- If searching for a one letter street name, such as X,Y or Z street, you must add the wildcard after the letter. For Example, X%.

Click the BLUE property address link to view the details of your account.

The Residence Homestead Exemption Application form is available from the details page of your account. You may search for your account by owner, by account or by address. Select the link "Print Homestead Exemption Form".

< PREV matches 11 - 16 of 16 properties. NEXT >					Page 2 of 2
#	Property Address	City	Owner Name / Business Name	Total Value	Type
11	8117 PRESTON RD Suite: 300	DALLAS	GILLHAM RICK DBA: GILLHAM GOLBECK & ASSOCIATES INC	\$1,900	BPP
12	8117 PRESTON RD Suite: 300	DALLAS	REGUS MANAGEMENT GROUP LLC DBA: REGUS MANAGEMENT GROUP LLC	\$190,400	BPP
13	8117 PRESTON RD Suite: 300	DALLAS	VCM TECHNOLOGIES INC DBA: BEACON SYSTEMS	\$49,280	BPP
14	8117 PRESTON RD Suite: 300	DALLAS	REMINGTON PARTNERS INC DBA: REMINGTON PARTNERS	\$390	BPP
15	8117 PRESTON RD Suite: 300	DALLAS	KESSLER STEVE DBA: KESSLER & KORBY PC	\$130	BPP
16	8117 PRESTON RD Suite: 300	DALLAS	EG LEGACY LLC DBA: EG LEGACY LLC	\$121,890	BPP
< PREV matches 11 - 16 of 16 properties. NEXT >					Page 2 of 2

NAVIGATION LINKS

- Annual Report
- About DCAD
- Search Appraisals
 - By Owner
 - By Account
 - By Address
 - By Business
- Find Property on Map
- Forms
- Data Products
- Open Records
- GIS Data Products
- Exemptions
- Property Valuation Process
- Protest Process
- Paying Taxes
- Local Tax Offices
- Taxing Unit Rates
- F.A.Q.
- Calendar
- Certified Value Summaries
- Certified Comparisons
- Certification Reports
- Preliminary Comparisons
- Average SFR Values
- Reappraisal Plan
- Water & Electricity Usage
- Administration
- Human Resources
- Links
- Contact Us

Find Property By Street Address

Search By: Owner Name Account Number Street Address Business Name
Map

Address Number	Direction	Street Name (required)	Account Type
8117	▼	PRESTON	<input checked="" type="checkbox"/> RESIDENTIAL
Building	Suite	City	<input checked="" type="checkbox"/> COMMERCIAL
	300	[ALL] ▼	<input checked="" type="checkbox"/> BPP

Address Number Range Search

From _____ To _____ Search

Hints:

- Do not enter the street type such as Street, Drive or Lane.
- To find a single address, fill in one Address Number field. To find a range of addresses, fill in both.
- If no results are found, try entering less information.
- Use % as a wildcard. For example, %oak in the street name to find all streets with "oak" somewhere in the name.
- If searching for a one letter street name, such as X,Y or Z street, you must add the wildcard after the letter. For Example, X%.

Click the BLUE property address link to view the details of your account.

The Residence Homestead Exemption Application form is available from the details page of your account. You may search for your account by owner, by account or by address. Select the link "Print Homestead Exemption Form".

< PREV matches 1 - 10 of 16 properties. NEXT >					Page 1 of 2
#	Property Address	City	Owner Name / Business Name	Total Value	Type
1	8117 PRESTON RD Suite: 300	DALLAS	REZAI MARYAM DBA: MARYAM REZAI MD	\$2,160	BPP
2	8117 PRESTON RD Suite: 300	DALLAS	CUMBERLAND TRUST & INVESTMENT CO DBA: CUMBERLAND TRUST & INVESTMENT CO	\$110	BPP
3	8117 PRESTON RD Suite: 300	DALLAS	GILLILAND PROPERTIES DBA: GILLILAND PROPERTIES	\$4,220	BPP
4	8117 PRESTON RD Suite: 300	DALLAS	VRX GLOBAL DBA: VRX GLOBAL	\$1,370	BPP
5	8117 PRESTON RD Suite: 300	DALLAS	THAYER LANCE DBA: THAYER WEALTH MANAGEMENT	\$2,800	BPP
6	8117 PRESTON RD Suite: 300	DALLAS	ROSENBERG M SUSAN DBA: M SUSAN ROSENBERG LCSW	\$8,800	BPP
7	8117 PRESTON RD Suite: 300	DALLAS	LHP HOSPITAL GROUP INC DBA: LHP CORPORATE	\$494,900	BPP
8	8117 PRESTON RD Suite: 300	DALLAS	BARTA JONNA LEE DBA: BARTA JONNA LEE	\$3,860	BPP
9	8117 PRESTON RD Suite: 300	DALLAS	PEAKBRAIN DBA: PEAKBRAIN	\$4,800	BPP
10	8117 PRESTON RD Suite: 300	DALLAS	WAN BRIDGE GROUP DBA: WAN BRIDGE GROUP	\$30,910	BPP

EXHIBIT 6

CAUSE NO: 002-02704-2020

HILARY THOMPSON HUTSON
Plaintiff

v.

COUNTY COURT AT LAW NO. 2

COLLIN COUNTY, TEXAS

BRIGETTA D'OLIVIO AND
ALL OTHER OCCUPANTS
Defendant


HONORABLE BARNETT WALKER

CERTIFICATE OF SERVICE

The undersigned, Brigetta D'Olivio hereby certifies that a true and correct copy of the foregoing instrument, "*Correspondence To County Court At Law 2- Official Court Reporter, Kristen Kopp; Court Reporter Unresponsive-Transcript Psid In Full 12/23/2020*", dated January 2, 2021, has been served in accordance with the Texas Rules of Civil Procedure 21, on Bruce Cohen, who is the attorney of record for Hilary T. Hutson, at the last known addresses:

Pravati Capital, LLC,
8117 Preston Rd., Suite 300,
Dallas, TX 75225

Pepsico Inc
7701 Legacy Dr
MC 3A-130C
Plano, TX 75024


Brigetta D'Olivio
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
BDT2916@gmail.com

9/9/2020

Gmail - 296-05192-2019 and 296-04855-2019



Brigetta D'Olivio <beautifulhomesbybrigetta@gmail.com>

296-05192-2019 and 296-04855-2019

Cohen, Bruce {PEP} <Bruce.Cohen@pepsico.com>
To: "296@collincountytx.gov" <296@collincountytx.gov>
Cc: Brigetta D'Olivio <beautifulhomesbybrigetta@gmail.com>, "cohenbru@msu.edu" <cohenbru@msu.edu>

Wed, Jan 8, 2020 at 3:08 PM

Ms. Kiser:

I've received Ms. D'Olivio's rather strident message below regarding scheduling of hearings on the "Emergency Application" and "Motion to Set Aside" that she has filed before this Court. I will be making a substantive filing later this week in both matters referenced above, but wanted to alert you that the Emergency Application and the Motion Set Aside have apparently been rendered moot by an order of Judge Copeland, dated January 6, 2020, in which he denied transfer of these cases. (Attached.) The Motion, the Emergency Application, and the underlying Motion to Transfer that has already been denied by Judge Wade, all seek a stay of these cases pending the Probate Court determination. Because that Court *has* ruled, these motions are moot. As such, I do not believe Ms. D'Olivio still requires argument on the Emergency Application on January 22; however, a final injunction in 296-05192-2019, is still scheduled.

As always, we appreciate your assistance. Please do not hesitate to contact me should you require anything further.

Best wishes for the New Year,

Bruce



Bruce D. Cohen
Senior Legal Director, Sales / Antitrust
PepsiCo, Inc. | Frito-Lay North America
7701 Legacy Drive, Plano, Texas 75024 USA
Office: 972 334 2260 | Cell: 972 955 7661 | Web: www.PepsiCo.com

[Quoted text hidden]

Order on Motion to Transfer RWT PROBATE MATTER.pdf
41K



Brigetta D'Olivio <beautifulhomesbybrigetta@gmail.com>

296-04855-2019 and 296-05192-2019

Cohen, Bruce David <cohenbru@msu.edu>
To: Brigetta D'Olivio <beautifulhomesbybrigetta@gmail.com>

Fri, Jan 10, 2020 at 3:48 PM

Ms. D'Olivio:

There appears to be a misunderstanding with respect to your approach to proper service in accordance with the Texas Rules of Civil Procedure. This is at least the fifth instance in which I've noted that irrespective of your not having registered as a E-Filed, it is still appropriate for you to be *served* by electronic mail. Further, such service may be effected by use of the E-filing platform. Indeed, you will recall, I provided you the proof of electronic service for the Motion for Summary Judgment that you have separately – but continuously – claimed not to have received. I have likewise verified with *each* document filed with the Court, that you are a service addressee at this e-mail address, the same one that you use to regularly communicate with both me and the Court.

Attached, as a courtesy, are copies of two documents that were served on you earlier this afternoon using the e-filing platform. To be clear, they do not have tracking numbers, and we will not be providing tracking numbers for them. No such numbers exist and none are expected to be created. I am simply unaware of any basis in law, fact or common sense for such tracking numbers to be provided for service of ordinary motion practice-related documents.

Additionally, you were copied on my correspondence to the District Court earlier this week, noting that Judge Copeland denied the motions to transfer that you had filed in Probate Court. I trust you agree that your putative Emergency Application and Motion to Set Aside are now moot.

Finally, please note that I am no longer using the bruce.cohen@pepsico.com email address, but will rely solely on the email from which this message has been sent, and which is included in the pleadings in the pending litigation. Should you intend to serve any *documents* to my physical address rather than by email, you may continue to send them to the PepsiCo office, but please do so to my attention, in care of Ms. Hutson.

Very truly yours,

Bruce D. Cohen

[Quoted text hidden]

2 attachments

 **RESPONSE TO MOTION TO SET ASIDE 04855 HTH.pdf**
273K

 **RESPONSE TO MOTION TO SET ASIDE 05192 HTH.pdf**
272K

This 10th day of January, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen

Bruce D. Cohen
Texas Bar No 24014866
MC 3A-130C
7701 Legacy Drive
Plano, Texas 75024
(972) 334-2260
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce

Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

**ATTORNEYS FOR DEFENDANT
HILARY THOMPSON HUTSON**

This 11th day of June, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Ste. 300
Dallas, Texas 75225
(214) 613-3726
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

This 25th day of June, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen

Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Ste. 300
Dallas, Texas 75225
(214) 613-3726
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce

Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

Bruce D. Cohen
Attorney-at-Law
8117 Preston Road
Suite 300
Dallas, Texas 75225

July 8, 2020

Ms. Brigetta D'Olivio
2916 Creekbend Drive
Plano, Texas 75075

Re: *Hutson v. D'Olivio*, Collin County Superior Court No. 296-04855-2019

Dear Ms. D'Olivio:

Yesterday, I received your correspondence of June 16, 2020, addressed to my former office at PepsiCo. After two or three readings, I believe I understand the points you are raising. You seem to suggest that I have failed to file various documents that are of record, failed to serve them as required by Texas state law, and failed to recognize that the Court in which the matter to dispossess you of the residence where you are unlawfully squatting is not the appropriate forum for determination of the issues before it. Bless your heart. There is little I can do to address the points you've putatively raised except to say that I am unaware of any instance in which my client or I are in violation of any Texas law or rule, and there is, indeed, no further response to which I believe you are entitled.

If you have an email address, you may always correspond with me at cohenbru@msu.edu. If you have posted correspondence for me, the address above is the only appropriate one to which it should be sent.

Very truly yours,

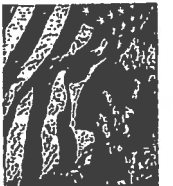
Bruce D. Cohen



cc: Ms. Hilary Thompson Hutson

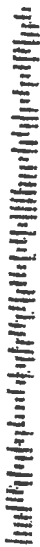
Bruce D. Cohen, Esq.
8117 Preston Road
Suite 300
Dallas, TX 75225

NORTH TEXAS TX 750
8 JUL 2020 PM 10 L



Ms. Brigetta DiOlivio
2916 Creekbend Drive
Plano, TX 75075

75075-750816



**BRIGETTA D'OLIVIO
2916 CREEKBEND DR.,
PLANO, TX 75075
214-733-7204**

FOURTH REQUEST

JULY 11, 2020

VIA FIRST CLASS MAIL

**Pepsico
Attn: Bruce Cohen
MC-3A-130C
7701 Legacy Dr
Plano, TX 75024
Bruce.cohen@pepsico.com**

**Bruce Cohen
8117 Preston Rd
Suite 300
Dallas, TX 75225**

**RE: Requests Made on June 16, 2020, June 22, 2020 and June 25, 2020
"Notice", dated June 11, 2020 and mailed on June 12, 2020 @5:00pm**

Dear Mr. Cohen:

On this date, I received your letter, dated July 8, 2020.

In your letter, dated July 8, 2020, you stated that you received my letter to you, dated June 16, 2020. In your letter, you claimed that said letter, dated June 16, 2020, was addressed to Pepsico. It was not. Said June 16, 2020 letter was addressed to you at your virtual office, located at 8117 Preston Rd., Suite 300, Dallas, TX 75225.

Since you had not responded to said June 16th letter, a 2nd letter was sent to you at the only known physical address for you, which was the Pepsico address. Said 2nd letter, which was addressed to you at Pepsico, was mailed on June 22, 2020. When you failed to respond to said 2nd letter, as well, a third letter, (3rd request), dated June 25, 2020, was sent to the only known physical address for you, which is the Pepsico address.

Said June 25th letter was sent via certified mail, which was received and signed for on June 29, 2020. Included in said June 25th letter were copies of the June 16th and June 22nd letters previously sent to you, to which you failed and refused to respond. Clearly, where you are referencing having received the June 16, 2020 letter *at the Pepsico address*, you

could only have received it *at said Pepsico address* by receiving the June 25, 2020 letter, wherein a copy of said June 16th letter, which had been sent to your virtual office address, was enclosed. Clearly you are receiving and responding to correspondence sent to you at the only known physical address for you, which is the Pepsico address and not responding to correspondence sent to the address you now claim is your address, (8117 Preston Rd., Suite 300).

Of the numerous entities who are, in fact, registered as having an address of "8117 Preston Rd, Suite 300", your name does not appear for any "suite 300" at said address, nor for any other suite number at said address. There are, however, numerous other entities whose names do appear as having "suite 300" at said address. If you are working for any of the listed entities whose suite number is 300, for said address, please inform me of such so that correspondence and/or legal documents pertaining to District Court cause number 296-04855-2019 can be sent to and/or served upon you. (Please note that the cause number: 296-04855-2019 is in District Court, *not* Superior Court).

Please further provide me with an accurate and up to date email address for you since the email you provided is for cohenbru@msu.edu, unless you are now claiming to either be faculty or a student at Michigan State University.

Where you have failed and refused to respond to my first and second requests as outlined in the letters dated, June 16, 2020 and June 22, 2020, and where you state in your letter, dated July 8, 2020 that "*there is, indeed, no further response to which I believe you are entitled*", I note for the record that you are intentionally failing and refusing to respond to my 3rd request, dated June 25, 2020, as well. That said requests are specifically in regards to your "notice", which was dated June 11, 2020, but mailed on June 12, 2020. I am a litigant in the cause number 296-04855-2019, and therefore have a right to be served any pleadings, motions, etc.

Let me remind you that you are not exempt from complying with the Texas Rules of Civil Procedure, nor from any other rule or law. The fact that you take it personally that I am the surviving spouse of Richard W. Thompson, Jr, is your problem, not mine. Your slanderous name-calling of me in your letter, dated July 8, 2020, only demonstrates your desperation to hide the truth from being exposed and your fear that justice will be done.

You and your "client", Hilary T. Hutson, filed the underlying lawsuit knowing that it was fraudulent and knowing that the subject matter, "Deed Without Warranty, dated May 5, 2018 is forged.

In fact, and as you know, Hilary T. Hutson didn't just forge one (1) "Deed Without Warranty", dated May 5, 2018 for my husband and my marital residence, (2916 Creekbend Dr., Plano, TX), she forged at least three (3) "Deed Without Warranty", all of which are dated May 5, 2018, and two (2) of which she filed in different proceedings, (PB1-1381-2019 and 296-04855-2019), at different times, and all of which are now on the record.

As you are further aware, my husband, Richard W. Thompson Jr, signed sworn affidavits, which are also on the record, and filed criminal complaints against Hilary T. Hutson regarding said forged "Deed Without Warranty" and other instruments forged by your client, Hilary T. Hutson.

Where you stated in your letter, dated July 8, 2020 that you read my letter "two or three" times, maybe you should take the time to read the Texas Rules of Civil Procedure, and the Texas Penal Code, specifically as they relate to filing and service of pleadings and the effects of signing pleadings which are groundless and fraudulent, as well as, filing fraudulent certificates of service and filing forged and fraudulent documents with the Courts and other County and State agencies, both in the State of Texas and other States.

In the meantime, and immediately upon receipt of this letter, please forward me the information requested in said three (3) letters, dated June 16, 2020, June 22, 2020 and June 25, 2020. Failing to do so is a willful violation of the Texas Rules of Civil Procedure.

Yours etc;


Brigetta D'Olivio

**BRIGETTA D'OLIVIO
2916 CREKBEND DR
PLANO, TX 75075
214-733-7204**

JUNE 16, 2020

VIA FIRST CLASS MAIL

**Bruce Cohen
8117 Preston Rd., Suite 300
Dallas, TX 75225**

Dear Mr. Cohen:

I am in receipt of your "notice". On page 3 of said notice, under the title, "Certificate of Service", you claim that you served said notice on June 11, 2020, yet the envelope, in which said notice came, is date and time-stamped June 12, 2020 @5pm.

You do not reference the date of the pleading, which you claim is in reference to said notice. As you recall, the submission/hearing date for your "Motion For Traditional And No-Evidence Summary Judgment", which you falsely claimed was filed on November 18, 2019, was December 9, 2019.

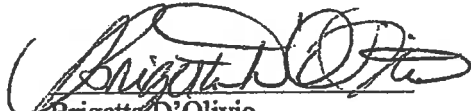
My responsive documents to said pleading have already been timely filed with the Court and were timely served on you, as Hilary T. Hutson's attorney on December 2, 2019 via FedEx. Subsequent and newly discovered evidence, (ie: a third forged "Deed Without Warranty", dated May 5, 2018 and metadata regarding your false claim that you filed your msj on November 18, 2018) was subsequently filed with the Court, as well. Since the submission/hearing date of December 9, 2019 for said "Motion For Traditional And No-Evidence Summary Judgment", which you falsely asserted was filed on November 18, 2019, I have not received any pleading as referenced in said notice.

I have further not received any pleading and/or Notice of Hearing, wherein a reset for the submission date of December 9, 2019 was requested and/or where the hearing/submission date of December 9, 2019, which has already expired, had been reset.

If any pleading and/or motion to reset hearing/submission date, and/or Notice of Hearing resetting the previously set December 9, 2019 hearing/submission date has been filed, please forward to me immediately any such pleading etc and provide me with proof of service for any such pleading, etc. If any such pleading etc was served via email, please send me an email with a copy of the original email as an attachment.

As you are aware, and have been made fully aware, this Court lacks the subject matter jurisdiction to decide any matter, other than it does not have the subject matter jurisdiction to decide any matter in this cause number, 296-04855-2019. This is also addressed in my pending motion to set aside.

Yours etc;



Brigetta D'Olivio

[Print this page](#)

Case # 31-EV-20-00951 - Hilary Thompson Hutson vs. Brigetta D'Olivio (Ruckel, Chuck)

Case Information

Location	Collin County - JP Precinct 3, Place 1
Date Filed	8/16/2020 8:25 AM
Case Number	31-EV-20-00951
Case Description	Hilary Thompson Hutson vs. Brigetta D'Olivio
Assigned to Judge	Ruckel, Chuck
Attorney	
Firm Name	Bruce D Cohen
Filed By	Bruce Cohen
Filer Type	Not Applicable
Estate Value	\$0.00
Damages Sought	Less than \$100,000 including damages of any kind

Fees

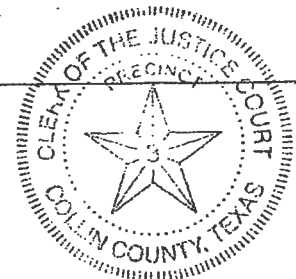
Convenience Fee	\$3.50
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$121.00
Total Court Service Fees	\$0.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$0.00
Total Provider Tax Fees	\$0.00
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$124.50

Payment

Account Name	OGF One-Time Account 2020-08-16
Transaction Amount	\$124.50
Transaction Response	Approved
Transaction ID	67353774
Order #	045416769-0

Eviction Suit

Filing Type	EFile
Filing Code	Eviction Suit
Motion Code	



Filing reviewed on 8/19/2020 by Brooke Wiggins

9-10-20

Received
8/17/2020 12:00 AM

Judge Chuck Ruckel - Precinct 3.1
COURT DATE: _____
Collin County, Texas

CASE NO. (court use only) 31-EV-20-00951 **PETITION: EVICTION CASE**

With suit for Rent

In the Justice Court, Precinct 3-1, Collin County, Texas

PLAINTIFF Hilary Thompson Hutson
(Landlord/Property Name)
VS.
DEFENDANT(S): Brigetta D'Olivio

Rental Subsidy (if any) _____
Tenant's Portion 0
TOTAL MONTHLY RENT \$0.00

and all other occupants.
COMPLAINT: Plaintiff (Landlord) hereby complains of the defendant(s) named above for eviction of plaintiff's premises (including storerooms and parking areas) located in the above precinct. Address of the property is:

2916 Creekbend Drive Plano TX 75075

Street Address Unit No. (if any) City State Zip

1. **SERVICE OF CITATION:** Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other addresses where the defendant(s) may be served are:

2. **UNPAID RENT AS GROUNDS FOR EVICTION:** Defendant(s) failed to pay rent for the following time period(s): _____
TOTAL DELINQUENT RENT AS OF DATE OF FILING IS: _____
Plaintiff reserves the right to orally amend the amount at trial to include rent due from the date of filing through the date of trial.

3. **OTHER GROUNDS FOR EVICTION/LEASE VIOLATIONS:** Lease Violations (if other than non-paid rent - list lease violations)
Defendant has been adjudicated a squatter in Hutson v. D'Olivio, Collin Dist. Court, No. 296-04855-2019, dated Aug. 11, 2020 (Trespass to Try Title)

4. **HOLDOVER AS GROUNDS FOR EVICTION:** Defendant(s) are unlawfully holding over since they failed to vacate at the end of the rental term or renewal of extension period, which was the _____ day of _____.

5. **NOTICE TO VACATE:** Plaintiff has given defendant(s) a written notice to vacate (according to Chapter 24.005 of the Texas Property Code) and demand for possession. Such notice was delivered on 8/12/2020 and delivered by this method:
US MAIL AND CERTIFIED MAIL

6. **ATTORNEY'S FEES:** Plaintiff will be or will NOT be seeking applicable attorney's fees. Attorney's name, address, and phone & fax numbers are:
Bruce D Cohen
8117 Preston Road, Ste. 300 Dallas, TX 75225
Phone: 214-613-3726

7. **BOND FOR POSSESSION:** If Plaintiff has filed a bond for possession, plaintiff requests (1) that the amount of plaintiff's bond and defendant's counter bond be set, (2) that plaintiff's bond be approved by the Court, and (3) that proper notices as required by the Texas Justice Court Rules are given to Defendant(s).

REQUEST FOR JUDGMENT: Plaintiff prays that defendant(s) be served with citation and that plaintiff have judgment against defendant(s) for: possession of premises, including removal of defendants and defendants' possessions from the premises, unpaid rent IF set forth above, attorney's fees, court costs, and interest on the above sums at the rate stated in the rental contract, or if not so stated, at the statutory rate for judgments.

I give my consent for the answer and any other motions or pleadings to be sent to my email address which is:
cohenbru@msu.edu

My name is: Bruce Cohen

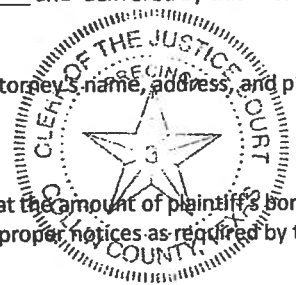
DEFENDANT(S) INFORMATION (if known): Defendant Name:
Phone Number, DOB, Last 3 Numbers of DL, Last 3 Numbers of SSN

Brigetta D'Olivio 214-733-7204 1961-04-25 443 087

My date of birth is: 09/14/1961
My address is: 8117 Preston Road, Ste. 300
Dallas, TX 75225 U.S.A.

I declare under penalty of perjury, pursuant to the law of the State of Texas, that all information provided is true and correct.

/s/ Bruce D Cohen
(Signature of Plaintiff (Landlord/Property Owner) or Agent)
Executed in Denton County, Texas
on 8/16/2020



Bruce D. Cohen
Attorney-at-Law
8117 Preston Road
Suite 300
Dallas, Texas 75225

September 2, 2020

BY E-MAIL
Clerk of Court,
Justice of the Peace Precinct 3-1
Collin County Courthouse
920 E. Park Blvd., Suite 220
Plano, TX 75074

Re: *Hutson v. D'Olivio*, Collin County JP Court No. 31-EV-20-00951

Ladies and gentlemen:

Attached are documents that will be submitted as evidence in the above-referenced matter, scheduled for trial on September 10, 2020 at 9:00 a.m.

Please contact the undersigned should you have any questions.

Very truly yours,



Bruce D. Cohen

cc: Ms. Brigetta D'Olivio (by U.S. Mail)
Ms. Hilary Thompson Hutson

2020 SEP 3 AM 7:39

JUSTICE COURT PRECINCT 3-1

2020 SEP -3 AM 7:39

FILED

CASE SUMMARY
CASE SUMMARY
CASE NO. 002-02704-2020

Hilary Thompson Hutson vs. Brigetta D'Olivio and All
Other Occupants

§
§
§
§

Location: **County Court at Law 2**
Judicial Officer: **Walker, Barnett**
Filed on: **12/07/2020**

CASE INFORMATION

Related Cases

296-04855-2019 (Related Case)
31-EV-20-00951 (Appeal from Lower Court)

Statistical Closures

12/31/2020 Final Judgment After Non-Jury Trial

Case Type: **JP Appeal**

Case Status: **12/31/2020 Case is Closed**

Case Flags: **Money in Court Registry Account**

\$2,000.00 on behalf of Brigetta D'Olivio: \$2,000.00 deposited into Court Registry for rent during appeal on behalf of Brigetta D'Olivio: \$2,000.00 deposited into Court Registry for rent during appeal on behalf of Brigetta D'Olivio: \$2,000.00 deposited into the Court Registry for rent during appeal on behalf of Brigetta D'Olivio

JP Appeals-Eviction

31-EV-20-00951

Bond on File

*\$1,000.00 Appeal Bond on behalf of Brigetta D'Olivio
\$20,000.00 Supersedeas Bond on behalf of Brigetta D'Olivio*

Notice of Appeal

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	002-02704-2020
Court	County Court at Law 2
Date Assigned	12/07/2020
Judicial Officer	Walker, Barnett

PARTY INFORMATION


Plaintiff	Hutson, Hilary Thompson	<i>Lead Attorneys</i> Cohen, Bruce D <i>Retained</i> 214-613-3726(W)
Defendant	D'Olivio, Brigetta	Pro Se 214-733-7204(H)

DATE

EVENTS & ORDERS OF THE COURT

INDEX

EVENTS

12/07/2020	 Petition for Appealed Case from Lower Court (OCA) 31-EV-20-00951 Party: Defendant D'Olivio, Brigetta
12/07/2020	Justice of the Peace Appeal Eviction

PRECINCT 3-1
CASE SUMMARY
CASE NO. 31-EV-20-00951

Hilary Thompson Hutson vs. Brigetta D'Olivio

§
§
§
§

Location: Precinct 3-1
Judicial Officer: Ruckel, Chuck
Filed on: 08/17/2020

002-02704-2020

CASE INFORMATION

File Date 08/19/2020

Case Type: Evictions

Cause of Action
Eviction

Description/Remedy
Action
\$121.00 Court Costs
\$0.00 Other
Comment: *Trepass to Try Title*

FILED
COUNTY COURT AT LAW
DEC 07 2020 3:58 PM
STACEY KEMP COUNTY CLERK
COLLIN COUNTY TEXAS
BY *Stacey Kemp* DEPUTY

Statistical Closures
11/11/2020 Trial/Hearing by Judge/Hearing Officer (OCA Line 8)

DATE CASE ASSIGNMENT

Current Case Assignment

Case Number	31-EV-20-00951
Court	Precinct 3-1
Date Assigned	08/17/2020
Judicial Officer	Ruckel, Chuck

PARTY INFORMATION

Plaintiff **Hutson, Hilary Thompson**
5900 Baywater Dr., Apt. 302
Plano, TX 75093

Lead Attorneys
Cohen, Bruce D
Retained
214-613-3726(W)
8117 Preston Road Ste.
300
Dallas, TX 75225

Defendant **D'Olivio, Brigetta**
2916 Creekbend Drive
Plano, TX 75075

DATE EVENTS & ORDERS OF THE COURT INDEX

08/17/2020	Case Filed (OCA)	
08/17/2020	Eviction Citation	
08/17/2020	Eviction Citation Service D'Olivio, Brigetta Served: 08/20/2020	
08/17/2020	Eviction Suit <i>Guide and File - Petition</i>	
08/17/2020	Military Affidavit Filed	
08/17/2020	Notice to Vacate	
08/19/2020	Cause of Action Eviction () Action Type Action	

This 16th day of December, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road, Ste. 300
Dallas, Texas 75225
(214) 613-3726
cohenbru@msu.edu

CAUSE NO: 002-02704-2020

HILARY THOMPSON HUTSON
Plaintiff

v.

COUNTY COURT AT LAW NO. 2

COLLIN COUNTY, TEXAS

BRIGETTA D'OLIVIO
Defendant

HONORABLE BARNETT WALKER

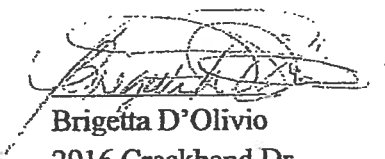
CERTIFICATE OF SERVICE

The undersigned, Brigetta D'Olivio hereby certifies that a true and correct copy of the foregoing instrument, "*Defendant's Proposed Final Judgment And Order On Forcible Entry And Detainer*", has been served in accordance with the Texas Rules of Civil Procedure 21. on the attorney's of record for Hilary T. Hutson, at the last known addresses:

Pravati Capital, LLC,
8117 Preston Rd., Suite 300
Dallas, TX 75225

Pepsico Inc
7701 Legacy Dr
MC 3A-130C
Plano, TX 75024

Leu & Peirce, PLLC
2313 Coit Rd. Ste. A
Plano, TX 75075



Brigetta D'Olivio
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
BDT2916@gmail.com

CAUSE NO: 002-02704-2020

HILARY THOMPSON HUTSON
Plaintiff

COUNTY COURT AT LAW NO. 2

v.

COLLIN COUNTY, TEXAS

**BRIGETTA D'OLIVIO AND
ALL OTHER OCCUPANTS**
Defendant

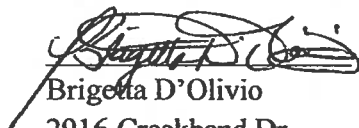
HONORABLE BARNETT WALKER

CERTIFICATE OF SERVICE

The undersigned, Brigetta D'Olivio hereby certifies that a true and correct copy of the foregoing instrument, "*Correspondence To County Court At Law 2- Official Court Reporter, Kristen Kopp; TO BE FILED AS PART OF THE RECORD*", dated December 23, 2020, has been served in accordance with the Texas Rules of Civil Procedure 21, on Bruce Cohen, who is the attorney of record for Hilary T. Hutson, at the Last known and filed addresses:

Pravati Capital, LLC,
8117 Preston Rd., Suite 300,
Dallas, TX 75225

Pepsico Inc
7701 Legacy Dr
MC 3A-130C
Plano, TX 75024


Brigetta D'Olivio
2916 Creekbend Dr
Plano, TX 75075
214-733-7204
bdt2916@gmail.com

This 18th day of September, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar Card No. 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
214 613-3726
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

Counsel for Hilary Thompson Hutson

This 9th day of October, 2020.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Ste. 300
Dallas, Texas 75225
(214) 613-3726
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

- (5) Plaintiff's Renewed Motion for Summary Judgment, filed June 25, 2020
- (6) Order Granting Summary Judgment, filed August 11, 2020
- (7) Defendant's Motion for Reconsideration, to Abate and Set Aside, filed September 14, 2020
- (8) Plaintiff's Response to Motion for Reconsideration, filed September 18, 2020
- (9) Defendant's Supplemental Reply to Plaintiff's Response to Motion for Reconsideration, filed October 5, 2020
- (10) Plaintiff's Response to Supplemental Reply on Motion to Dismiss, filed October 9, 2020
- (11) Notice of Appeal, filed November 11, 2020
- (12) The extensive correspondence from the Defendant regarding documents for inclusion in the Clerk's Record, filed Nov. 11, Nov. 30, Dec. 3, Dec. 4, Dec. 10, Dec. 11, Dec. 21, Dec. 23, 2020 & Jan. 4, 2021

While these documents represent only a small fraction of the frivolous filings and motions of the Defendant, they provide a sufficient record for consideration of the action on appeal by the Fifth District Court of Appeals.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
(214) 613-3726
cohenbru@msu.edu

remedy that works further prejudice to the Appellee. Ms. Hutson has been involved in this litigation (and other probate disputes) with the Appellant for over two years, during which Ms. Hutson has been the subject of frequent, unsupported allegations of fraud, forgery and deceit toward her late father. Appellant has provided no basis for the Court to further extend her permissive extension and the matter should be dismissed for want of prosecution.

WHEREFORE, Appellee Hilary Thompson Hutson respectfully prays that the Court:

- (a) Dismiss the instant action for want of subject-matter jurisdiction, an untimely appeal having been filed; or
- (b) Dismiss the instant action for want of prosecution; and
- (c) Grant such other and further relief as the Court may deem appropriate.

This 20th day of January, 2021.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225

(972) 334-2260
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
Telephone: 972.996.2540
Facsimile: 972.996.2544

Attorneys for Appellee
Hilary Thompson Hutson

Bruce D. Cohen
Attorney and Counselor at Law
8117 Preston Road, Suite 300
Dallas, Texas 75225
972 955-7661 cohenbru@msu.edu

FILED IN
5th COURT OF APPEALS
DALLAS, TEXAS
2/10/2021 9:48:52 AM
LISA MATZ
Clerk

February 10, 2021

Fifth District Court of Appeals
Clerk of the Court
600 Commerce Street, Suite 200
Dallas, Texas 75202

Re: Response of Appellee on Court's Inquiry as to Jurisdiction
D'Olivio v. Hutson,
Court of Appeals Number: 05-20-00969-CV
Trial Court Case Number: 296-04855-2019

To the Honorable Justices of the Court:

On January 25, 2021, the Court directed *pro se* Appellant, Brigetta D'Olivio, to file no later than February 4, 2021, a letter brief addressing the Court's concern that it lacked jurisdiction over the instant matter, because a Notice of Appeal was untimely filed. Ms. D'Olivio appears to have filed her response on February 5, using a two-day express service. Whether such filing is itself consistent with the Court's express instructions and TEX. R. APP. P. 9.2(b), is a question solely for the Court.

The untimeliness of the underlying notice of appeal, however, turns on a question of law. Ms. D'Olivio's 43-page filing notes in wearisome detail that she placed her "Motion for Reconsideration, to Set Aside and to Dismiss," in the hands of a commercial delivery service (FedEx) on September 9, 2020, and that it was delivered to the Clerk of Court of Collin County on the morning of September 10, 2020. Normally, that would suffice to satisfy the deadline for filing the Notice of Appeal necessary to give rise to this Court's jurisdiction.

The problem, however, is that Ms. D'Olivio did not also timely tender the requisite \$80.00 fee assessed by Collin County for filing of a Motion for Reconsideration. Standard practice in the district courts appears to be accepting such a filing, and notifying the filing party of a deficiency, granting a reasonable period to rectify the

the plenary jurisdiction questions posed before him, adjourned the matter pending adjudication by the District Court. A party's misrepresentation to another court that a motion is pending when her own intentional act (an unwillingness to tender a fee) made that statement untrue, presents a case markedly different from even the most generous reading of *Garza v. Garcia*.

This Court has shown enormous generosity to an Appellant who is literally living rent-free in someone else's home. As a squatter, she has no interest in moving her litigation forward and will continue to intentionally delay consideration of the many proceedings in which she appears as long as she is permitted to do so. Her failure to pay the requisite fee was not the result of accident or inadvertence. And, the Appellant having intentionally misrepresented to a Justice Court that a motion was properly before a District Court when her intentional failure to timely pay the requisite fee made that fact untrue, this Court should dismiss the instant action.

This 11th day of February, 2021.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
(972) 334-2260
cohenbru@msu.edu

EXHIBIT 7



Bruce D. Cohen

Director

brcohen@MLAGlobal.com

office: +1.214.414.2455 | **mobile:** +1.972.955.7661

locations: [Dallas](#)



Bruce Cohen, a Director on our In-House Counsel Recruiting team, assists corporations, nonprofit government agencies and higher education institutions with identifying exceptional lawyers to enhance their legal teams. Bruce's clients have always enjoyed his relational approach to business; he has seen that the best teams work well together when their members complement each other's strengths and perspectives. He strives to find the right fit for both clients and candidates.

Bruce is a native of Pittsburgh and a lifelong fan of the Penguins, the Pirates and the Steelers. He is also a former United States Army field artillery officer and over his years, he has served in the Army's most elite units, including the 1st Cavalry Division and the 1st Infantry Division. He has served in the Army's most elite units, including the 1st Cavalry Division and the 1st Infantry Division. He has served in the Army's most elite units, including the 1st Cavalry Division and the 1st Infantry Division.

LEARN MORE

EXHIBIT 8



STATE BAR of TEXAS

MR. BRUCE DAVID COHEN

Eligible to Practice in Texas

MAJOR, LINDSEY & AFRICA

Bar Card Number: 24014866

TX License Date: 03/03/2000

Primary Practice Location: Dallas, Texas

6900 Dallas Pkwy Ste 300

Plano, TX 75024-4276


Practice Areas: Antitrust, Bankruptcy, Business, Creditor-Debtor, Litigation: Commercial, Litigation: Personal Injury

Statutory Profile Last Certified On: 03/08/2021

PRACTICE INFORMATION

Firm: Major, Lindsey & Africa

CONTACT INFORMATION

Tel: 214-414-2455 

COURTS OF ADMITTANCE

We use cookies to analyze our traffic and enhance functionality. [More Information](#)

AGREE

Practice Areas: *Antitrust, Bankruptcy, Business, Creditor-Debtor, Litigation: Commercial, Litigation:*

Personal Injury

Services Provided:

Deaf/Hard of Hearing Translation: Not Specified

ADA-accessible client service: Not Specified

Language translation: Not Specified

Fee Options Provided: ②

None Reported By Attorney

Please note: Not all payment options are available for all cases, and any payment arrangement must be agreed upon by the attorney and his/her client. The State Bar of Texas is not responsible for payment arrangements between an attorney and his/her client.

Foreign Language Assistance:

None Reported By Attorney

LAW SCHOOL

School

Degree earned

University of Georgia

Graduation Date 05/1990

PUBLIC DISCIPLINARY HISTORY

State Bar of Texas

No Public Disciplinary History

Other States

None Reported By Attorney

Fifth Circuit Court of Appeals

Eighth Circuit Court of Appeals

Eleventh Circuit Court of Appeals

US Court of Appeals for the Federal Circuit

District of Columbia District Court

Georgia Northern District Court

New Jersey District Court

Texas Eastern District Court

Texas Western District Court

Other Courts:

Georgia - Supreme Court of Georgia State - Supreme Court

Other States Licensed:

Georgia

Please note: This information is self-reported by Texas attorneys. Current license or admittance status can only be certified by the appropriate court or licensing entity.

EXHIBIT 9

Form 304
(revised 9/03)

This space reserved for office use.



Return in Duplicate to:
Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
FAX: 512/463-5709

Filing Fee: \$500

**Application for
Certificate of Authority
Pursuant to Article 7.05
Texas Limited Liability
Company Act**

FILED
**In the Office of the
Secretary of State of Texas**
SEP 30 2005
Corporations Section

1. The name of the limited liability company is as set forth below:

Major, Lindsey & Africa, LLC

The name must not be the same as, deceptively similar to or similar to that of an existing corporate, limited liability company, or limited partnership name on file with the secretary of state. A preliminary check for "name availability" is recommended.

2A. The legal name of the limited liability company does not contain the words "Limited Liability Company," or "Limited Company," or the abbreviations "L.L.C." "LLC," "L.C.," or "LC." The name of the company with the word or abbreviation that it elects to add for use in Texas is:

2B. The limited liability company name is not available in Texas. The assumed name under which the limited liability company will qualify and transact business in Texas is:

3. The entity electing to obtain this certificate of authority is not required to use an organizational ending indicating it is a limited liability company since it is not characterized or formed as a limited liability company under the laws of the jurisdiction governing its formation.

4. Its federal employer identification number is: 68-0471543

Federal employer identification number information is not available at this time.

5. It is organized under the laws of: (set forth state or foreign country) Delaware

6. The date of its organization is May 7, 2001 and its period of duration is:

perpetual or limited duration of a term of years set at: _____

7. The principal office address in the state or country of the company's jurisdiction of formation is:
(If the company does not maintain an office address in its jurisdiction of formation, then provide the registered office address of its registered agent in the jurisdiction of formation in the space provided below.)

1209 Orange Street
Address

Wilmington
City

Delaware/U.S.
State/Country

19801
Zip/Postal Code

8. Its proposed registered agent in Texas is: (See instructions. Cannot be company named above.)

Brian C. Hawryluk

and the street address of its proposed registered office, which is the business office address of its proposed registered agent in Texas, is: (A post office box address is not sufficient, please provide street address.)

2960 Saint Street, Houston, TX 77027

9. The purpose or purposes of the limited liability company that it proposes to pursue in the transaction of business in Texas are set forth below. The company also certifies that it is authorized to pursue such stated purpose or purposes in the state or country under which it is organized.

Legal Recruiting

(Complete either item 10A or 10B below.)

10A. The name and address of each of its managers is:

NAME	ADDRESS (include city and state/country)

10B. The company is member-managed. The name and address of each of its managing members is::

NAME	ADDRESS (include city and state/country)
SEE ATTACHED LIST	

11. As of the date of filing, the undersigned certifies that the foreign limited liability company currently exists as a valid entity under the laws of the jurisdiction of its formation.

Effective Date of Filing

- The document is to be effective when the document is filed by the secretary of state.
OR
 This document will become effective at a later date, which is not more than ninety (90) days from the date of its filing by the secretary of state. The delayed effective date is: _____

Execution

The undersigned authorized manager or member of the limited liability company signs this document subject to the penalties imposed by law for the submission of a false or fraudulent document.


Signature of Authorized Manager/Member

9/28/05
Date

Major, Lindsey & Africa Partner & Managing Director Information

Ultimate owner	address	Entity owning units in Major, Lindsey & Africa, LLC S-Corp / Part / Ind
Robert Major	124 Prospect Ave Sausalito, Ca 94965	Major, Hagen & Africa (partnership) 500 Washington St., 5th Floor San Francisco, CA 94111
Charles Fanning	60 The Plaza Dr Berkeley, Ca 94705	Major, Hagen & Africa (partnership) 500 Washington St., 5th Floor San Francisco, CA 94111
Kimberly Fullerton	2989 Jackson St, #4 San Francisco, Ca 94115	Major, Hagen & Africa (partnership) 500 Washington St., 5th Floor San Francisco, CA 94111
Jon Lindsey	70 E 96th St New York, NY 10128	Major, Hagen & Africa, Inc. (S-Corp) 551 5th Ave, 22nd Floor New York, NY 10176
Miriam Frank	1402 Prairie Trail Grayslake, Ill 60030	Frank S-Corp
Carter Brown	18 Hillcrest Rd Atlanta, Ga 30305	Brown S-Corp
Melinda Wallman	Apartment 16E, Celeste Court 25 Colville Road London, W11 2 BT United Kingdom	Individual
Gigi Birchfield	2324 Nottingham Ave Los Angeles, CA 90027	Birchfield S-Corp
Brion Bickerton	223 Slade Street Belmont, MA 02478	Brion Alexander S-Corp
Richards Gordon	Richards Gordon 53 Cypress Rd Wellesley, MA 02481	Richards Gordon S-Corp

Note: Most ownership units in MLA are held by a SubS Corp. which is 100% owned by the ultimate owner shown

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MAJOR, LINDSEY & AFRICA, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-THIRD DAY OF JUNE, A.D. 2005.



Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State

3389036 8300

050497588

AUTHENTICATION: 3972442

DATE: 06-23-05

Form 406
(Revised 02/06)

Return in duplicate to:
Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
512 463-5555
FAX: 512/463-5709
Filing Fee: See instructions



Amendment to Registration

This space reserved ~~FILED~~ use.

In the Office of the
Secretary of State of Texas

SEP 23 2008

Corporations Section

The legal name of the filing entity is:

Major, Lindsey & Africa, LLC

State the name of the entity as currently shown in the records of the secretary of state.

If the entity attained its registration under an assumed name, the qualifying assumed name as shown on the records of the secretary of state is:

The application for registration was issued to the entity on: 09/30/2005

mm/dd/yyyy

The file number issued to the filing entity by the secretary of state is: 800553362

A. The application for registration is amended to change the legal name of the entity as amended in the entity's jurisdiction of formation. The new name is:

MLA Legal, LLC

The entity was registered with the secretary of state before January 1, 2006, and has not elected early adoption of the BOC and in accordance with the law applicable to the entity has attached a certificate from the proper filing office in the jurisdiction of formation evidencing the name change.

The entity was registered with the secretary of state on or after January 1, 2006, or has filed an early adoption statement with the secretary of state and is not required to attach a certificate evidencing the name change in the jurisdiction of formation.

B. The new name of the entity is not available for use in Texas or fails to include an appropriate organizational designation. Or, the entity wishes to amend the qualifying assumed name stated on its registration or amended registration. The assumed name the entity elects to adopt for purposes of maintaining its registration is:

C. The application for registration is amended to change the business or activity stated in its application for registration. The business or activity that the entity proposes to pursue in this state is:

The entity is authorized to pursue the same business or activity under the laws of the entity's jurisdiction of formation.

The foreign filing entity desires to amend its application for registration to make changes other than or in addition to those stated above. Statements contained in the original application or any amended application are identified by number or description and changed to read as follows:

- _____
- 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:

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

Date: 9-17-08

R. D. Lucas

secretary

Signature and title of authorized person(s) (see instructions)

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT THE SAID "MAJOR, LINDSEY & AFRICA, LLC", FILED A CERTIFICATE OF AMENDMENT, CHANGING ITS NAME TO "MLA LEGAL, LLC", THE FIFTH DAY OF SEPTEMBER, A.D. 2008, AT 2:33 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID LIMITED LIABILITY COMPANY IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE NOT HAVING BEEN CANCELLED OR DISSOLVED SO FAR AS THE RECORDS OF THIS OFFICE SHOW AND IS DULY AUTHORIZED TO TRANSACT BUSINESS.

3389036 8320

080968141

You may verify this certificate online
at corp.delaware.gov/authver.shtml



Harriet Smith Windsor
Harriet Smith Windsor, Secretary of State
AUTHENTICATION: 6860863

DATE: 09-19-08



Office of the Secretary of State
Corporations Section
P.O. Box 13697
Austin, Texas 78711-3697
(Form 408)

Filed in the Office of the
Secretary of State of Texas
Filing #: 800553362 10/30/2009
Document #: 281719915142
Image Generated Electronically

**STATEMENT OF CHANGE OF
ADDRESS OF REGISTERED AGENT**

1. The name of the entity represented is
MLA Legal, LLC

The entity's filing number is 800553362

2. The address at which the registered agent has maintained the registered office address for such entity is: (Please provide street address, city, state and zip code presently shown in the records of the Secretary of State.)

701 Brazos, Suite 1050, Austin, TX 78701

3. The address at which the registered agent will hereafter maintain the registered office address for such entity is: (Please provide street address, city, state and zip code. The address must be in Texas.)

211 E. 7th Street, Suite 620, Austin, TX 78701

4. Notice of the change of address has been given to said entity in writing at least 10 business days prior to the submission of this filing.

Date: 10/30/2009

Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
Name of Registered Agent

John H. Pelletier, Asst. VP

Signature of Registered Agent

FILING OFFICE COPY

MAJOR, LINDSEY & AFRICA, LLC: W12864567

Notice



If you applied for a 2-month extension prior to April 15th, the NEW deadline to file Annual Report/Personal Property Tax Return Filings is June 15th. **Please go [HERE](#) to file your Annual Report.**

A 2-month **extension request** for filing the Annual Report and Personal Property Tax Return may be filed here.

Department ID Number:

W12864567

Business Name:

MAJOR, LINDSEY & AFRICA, LLC

Principal Office: 

7320 PARKWAY DRIVE

HANOVER MD 21076

Resident Agent: 

CSC-LAWYERS INCORPORATING SERVICE

COMPANY

7 ST. PAUL STREET

SUITE 820

BALTIMORE MD 21202

Status:

ACTIVE

Good Standing:

THIS BUSINESS IS IN GOOD STANDING

Business Type:

DOMESTIC LLC

Business Code:

20 ENTITIES OTHER THAN CORPORATIONS

Date of Formation/ Registration:

01/09/2009

State of Formation:

MD

Stock Status:

N/A

Close Status:

Delaware

PAGE 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE CERTIFICATE OF MERGER, WHICH MERGES:

"MAJOR, LINDSEY & AFRICA - BOSTON, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - MIDWEST, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - NEW ENGLAND, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - NEW YORK, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - NORTHERN CALIFORNIA, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - PHILADELPHIA, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - SEATTLE, LLC", A DELAWARE LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - SOUTHERN CALIFORNIA, LLC", A DELAWARE LIMITED LIABILITY COMPANY,


"MAJOR, LINDSEY & AFRICA - TEXAS, LLC", A DELAWARE LIMITED

3662861 8330

090354138

You may verify this certificate online
at corp.delaware.gov/authver.shtml




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 7240409

DATE: 04-13-09

Delaware

PAGE 2

The First State

LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - VIRGINIA, LLC", A MARYLAND
LIMITED LIABILITY COMPANY,

"MAJOR, LINDSEY & AFRICA - WASHINGTON, D.C., LLC", A
DELAWARE LIMITED LIABILITY COMPANY,

"MLA ASSOCIATES-NORTHERN CALIFORNIA, LLC", A DELAWARE
LIMITED LIABILITY COMPANY,

"MLA ASSOCIATES-SOUTHERN CALIFORNIA, LLC", A DELAWARE
LIMITED LIABILITY COMPANY,

"MLA ASSOCIATES-TEXAS, LLC", A DELAWARE LIMITED LIABILITY
COMPANY,

WITH AND INTO "MAJOR, LINDSEY & AFRICA, LLC" UNDER THE NAME
OF "MAJOR, LINDSEY & AFRICA, LLC", A LIMITED LIABILITY COMPANY
ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF MARYLAND,
WAS RECEIVED AND FILED IN THIS OFFICE THE TWENTIETH DAY OF
MARCH, A.D. 2009, AT 5:05 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID LIMITED
LIABILITY COMPANY SHALL BE GOVERNED BY THE LAWS OF THE STATE OF
MARYLAND.


AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF

3662861 8330

090354138



You may verify this certificate online
at corp.delaware.gov/authver.shtml


Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 7240409

DATE: 04-13-09

Delaware

PAGE 3

The First State

THE AFORESAID CERTIFICATE OF MERGER IS THE FIRST DAY OF APRIL,
A.D. 2009, AT 12:01 O'CLOCK A.M.

AND I DO HEREBY FURTHER CERTIFY THAT UPON FILING OF THE
AFORESAID CERTIFICATE OF MERGER, THE EXISTENCE OF "MAJOR,
LINDSEY & AFRICA - TEXAS, LLC" WAS TERMINATED.

3662861 8330

090354138

You may verify this certificate online
at corp.delaware.gov/authvax.shtml




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 7240409

DATE: 04-13-09

EXHIBIT 10

Property Search

Property ID: 2815358 - Tax Year: 2023

General Information

Property ID 2815358
Property Status Active
Geographic ID P-9000-220-5966-1
Property Type Personal
Property Address 6900 Dallas Pkwy #00300
Plano, TX 75024
DBA Name Wework
Total Land Area n/a
Total Improvement Main Area n/a
Abstract/Subdivision
Primary State Code L1 (Tangible Commercial - Personal)
Legal Description BPP AT 6900 DALLAS PKWY

Owner Information

Owner ID 1145870
Owner Name(s) 6900 North Dallas Parkway Tenant LLC
% Wework
Exemptions None
Percent Ownership 100.00%
Mailing Address 6900 Dallas Pkwy Ste 300
Plano, TX 75024-4276

2023 Value Information

Value information for Property ID 2815358 in the 2023 tax year is unavailable. Value information for prior years may be available in the Value History section below.

Entities

Taxing Entity	Tax Rate	Collected By
CPL (Plano City)	0.417600 (2022 Rate)	Collin County Tax Office
GCN (Collin County)	0.152443 (2022 Rate)	Collin County Tax Office
JCN (Collin College)	0.081220 (2022 Rate)	Collin County Tax Office
SPL (Plano ISD)	1.259750 (2022 Rate)	Collin County Tax Office

Improvements

Our records don't show any improvement data for Property ID 2815358 in the year 2023.

Land Segments

Our records don't show any land data for Property ID 2815358 in the year 2023.

Value History

Year	Improvement	Land	Market	Ag Loss	Appraised	HS Cap Loss	Assessed
2022	\$0	\$0	\$1,559,256	\$0	\$1,559,256	\$0	\$1,559,256
2021	\$0	\$0	\$1,716,252	\$0	\$1,716,252	\$0	\$1,716,252
2020	\$0	\$0	\$863,426	\$0	\$863,426	\$0	\$863,426

Deed History

Deed Date	Seller	Buyer	Instr #	Volume/Page
-----------	--------	-------	---------	-------------

Endpoint

6900 Dallas Pkwy Ste 300, Plano, TX 75024 · ~4.9 mi

(469) 529-5084

endpoint.com

Days of week	Open hours
Sunday	Closed
Monday	8:30 AM - 7 PM
Tuesday	8:30 AM - 7 PM
Wednesday	8:30 AM - 7 PM
Thursday	8:30 AM - 7 PM
Friday	8:30 AM - 5 PM
Saturday	Closed

Mighty Dog Roofing

6900 Dallas Pkwy Ste 300, Plano, TX 75024 · ~4.9 mi

(972) 703-4222

mightydogroofing.com

Hours: Open 24 hours

Service Areas: Fort Worth

Greenstaff Medical

6900 Dallas Pkwy Ste 300, Plano, TX 75024

866-672-8432

NAVIGATION LINKS

- Annual Report
- About DCAD
- Search Appraisals
 - By Owner
 - By Account
 - By Address
 - By Business
- Find Property on Map
- Forms
- Data Products
- Open Records
- GIS Data Products
- Exemptions
- Property Valuation Process
- Protest Process
- Paying Taxes
- Local Tax Offices
- Taxing Unit Rates
- F.A.Q.
- Calendar
- Certified Value Summaries
- Certified Comparisons
- Certification Reports
- Preliminary Comparisons
- Average SFR Values
- Reappraisal Plan
- Water & Electricity Usage
- Administration
- Human Resources
- Links
- Contact Us

Find Property By Street Address

Search By: Owner Name Account Number Street Address Business Name
[Map](#)

Address Number	Direction	Street Name (required)	Account Type
<input type="text" value="1920"/>	▼	<input type="text" value="MCKINNEY"/>	<input checked="" type="checkbox"/> RESIDENTIAL
Building	Suite	City	<input checked="" type="checkbox"/> COMMERCIAL
		[ALL] ▼	<input checked="" type="checkbox"/> BPP

Address Number Range Search

From To

Hints:

- Do not enter the street type such as Street, Drive or Lane.
- To find a single address, fill in one Address Number field. To find a range of addresses, fill in both.
- If no results are found, try entering less information.
- Use % as a wildcard. For example, %oak in the street name to find all streets with "oak" somewhere in the name.
- If searching for a one letter street name, such as X,Y or Z street, you must add the wildcard after the letter. For Example, X%.

Click the BLUE property address link to view the details of your account.

The Residence Homestead Exemption Application form is available from the details page of your account. You may search for your account by owner, by account or by address. Select the link "Print Homestead Exemption Form".

< PREV matches 1 - 10 of 18 properties. NEXT >					Page 1 of 2
#	Property Address	City	Owner Name / Business Name	Total Value	Type
1	1920 MCKINNEY AVE	DALLAS	1900 MCKINNEY HARWOOD LLC	\$62,750,000	COMMERCIAL
2	1920 MCKINNEY AVE	DALLAS	WEWORK DBA: WEWORK	\$1,262,110	BPP
3	1920 MCKINNEY AVE	DALLAS	MIDFIRST BANK MFB DBA: MFB-TX-ATM-DALLAS	\$2,220	BPP
4	1920 MCKINNEY AVE	DALLAS	COUNTERFIND INC DBA: COUNTERFIND	\$2,870	BPP
5	1920 MCKINNEY AVE Suite: 100	DALLAS	FRONT BURNER DBA: HAYWIRE-UPTOWN	\$1,030,720	BPP
6	1920 MCKINNEY AVE Suite: 10TH	DALLAS	DALLAS CITY OF EMPLOYEES RETIREMENT FUND DBA: EMPLOYEES RETIREMENT FUND CITY OFD	\$180	BPP
7	1920 MCKINNEY AVE Suite: 1100	DALLAS	AVISON YOUNG DBA: AVISON YOUNG	\$286,270	BPP
8	1920 MCKINNEY AVE Suite: 1150	DALLAS	STEWART PARTNERS HOLDINGS LLC DBA: STEWARD PARTNERS GLOBAL ADVISORY L	\$115,850	BPP
9	1920 MCKINNEY AVE Suite: 700	DALLAS	GEARING CAPITAL MANAGEMENT LP DBA: GEARING CAPITAL MANAGEMENT LP	\$11,890	BPP

NAVIGATION LINKS

- Annual Report
- + About DCAD
- Search Appraisals
 - By Owner
 - By Account
 - By Address
 - By Business
- Find Property on Map
- Forms
- Data Products
- Open Records
- GIS Data Products
- Exemptions
- Property Valuation Process
- Protest Process
- Paying Taxes
- Local Tax Offices
- Taxing Unit Rates
- F.A.Q.
- Calendar
- Certified Value Summaries
- Certified Comparisons
- Certification Reports
- Preliminary Comparisons
- Average SFR Values
- Reappraisal Plan
- Water & Electricity Usage
- + Administration
- + Human Resources
- Links
- Contact Us

Find Property By Street Address

Search By: [Owner Name](#) [Account Number](#) [Street Address](#) [Business Name](#)
[Map](#)

Address Number	Direction	Street Name (required)	
1920	▼	MCKINNEY	
Building	Suite	City	
		[ALL] ▼	

Account Type

- RESIDENTIAL
- COMMERCIAL
- BPP

Address Number Range Search

From To Search

Hints:

- Do not enter the street type such as Street, Drive or Lane.
- To find a single address, fill in one Address Number field. To find a range of addresses, fill in both.
- If no results are found, try entering less information.
- Use % as a wildcard. For example, %oak in the street name to find all streets with "oak" somewhere in the name.
- If searching for a one letter street name, such as X,Y or Z street, you must add the wildcard after the letter. For Example, X%.

Click the BLUE property address link to view the details of your account.

The Residence Homestead Exemption Application form is available from the details page of your account. You may search for your account by owner, by account or by address. Select the link "Print Homestead Exemption Form".

< PREV matches 11 - 18 of 18 properties. NEXT >					Page 2 of 2
#	Property Address	City	Owner Name / Business Name	Total Value	Type
11	1920 MCKINNEY AVE Suite: 7TH	DALLAS	PIC TRAVEL INC DBA: PIC TRAVEL INC	N/A	BPP
12	1920 MCKINNEY AVE Suite: 7TH	DALLAS	OPEN REALTY ADVISORS DBA: OPEN REALTY ADVISORS	\$40,030	BPP
13	1920 MCKINNEY AVE Suite: 7TH	DALLAS	ROBBINS REAL ESTATE GROUP LLC DBA: ROBBINS REAL ESTATE GROUP	\$11,860	BPP
14	1920 MCKINNEY AVE Suite: 900	DALLAS	MIDFIRST BANK DBA: MIDFIRST PRIVATE BANK DALLAS	\$459,430	BPP
15	1920 MCKINNEY AVE Suite: 940	DALLAS	CREATIVE CIRCLE LLC DBA: CREATIVE CIRCLE LLC	\$39,380	BPP
16	1920 MCKINNEY AVE Suite: FL 7	DALLAS	REAP MARKETING LP DBA: REAP MARKETING LP	\$2,180	BPP
17	1920 MCKINNEY AVE Suite: FL 7	DALLAS	CUCCIA LEGAL PLLC DBA: CUCCIA LEGAL PLLC	\$450	BPP
18	1920 MCKINNEY AVE Suite: FL 7	DALLAS	TYSON ACCOUNTING PLLC DBA: TYSON ACCOUNTING PLLC	\$24,750	BPP

< PREV matches 11 - 18 of 18 properties. NEXT >

Page 2 of 2

Major, Lindsey & Africa

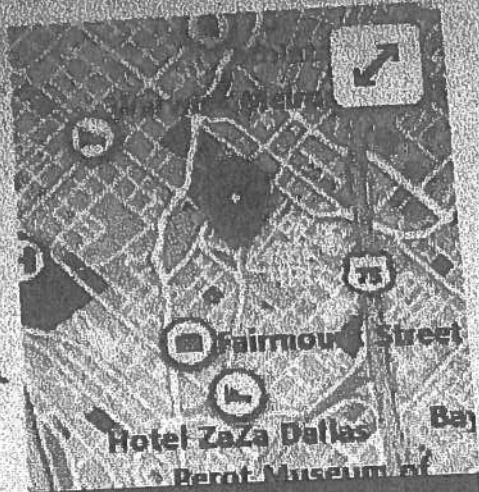
Phone: (214) 378-1010

Address: 3131 McKinney Ave Ste 730, Dallas, TX 75204

Website: <http://www.mlaglobal.com>



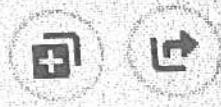
MAJOR, LINDSEY & AFRICA



All images

Permanently closed

Major Lindsey & Africa



Directions

Contact us

3131 MCKINNEY Ave, Dallas, TX 75204 · ~15 mi

(214) 378-1010

Suggest an edit · Your business? Claim now

We are the global navigators of legal careers. Our legal recruiting services match law firms and corporations with elite lawyers and legal professionals. See more

EXHIBIT 11

No. 05-20-01118-CV

**IN THE COURT OF APPEALS FOR THE FIFTH JUDICIAL DISTRICT OF TEXAS
DALLAS**

FILED IN
5th COURT OF APPEALS
DALLAS, TEXAS
8/26/2021 8:38:31 AM
LISA MATZ
Clerk

BRIGETTA D'OLIVIO,
Appellant,

v.

HILARY THOMPSON HUTSON,
Appellee.

From the County Court at Law 2, Collin County, Texas,
No. 002-02704-2020, Hon. Barnett Walker, Presiding.

RESPONSE BRIEF OF APPELLEE HILARY THOMPSON HUTSON

Bruce D. Cohen
State Bar No. 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
Telephone: (214) 613-3726
cohenbru@msu.edu

Counsel for Appellee

WHEREFORE, Appellee Hilary Thompson Hutson respectfully prays that the Court affirm the judgment of the County Court at Law, and grant such other and further relief as may be appropriate.

This 26th day of August, 2021.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
(972) 334-2260
cohenbru@msu.edu

No. 05-20-00969-CV

IN THE COURT OF APPEALS FOR THE FIFTH JUDICIAL DISTRICT OF DALLAS, TEXAS
IN DALLAS

FILED IN
5th COURT OF APPEALS
DALLAS, TEXAS
9/27/2021 12:02:46 PM
LISA MATZ
Clerk

BRIGETTA D'OLIVIO,
Appellant,

v.

HILARY THOMPSON HUTSON,
Appellee.

From the 296th District Court, Collin County, Texas,
No. 296-04855-2019, Hon. John R. Roach, Jr., Presiding.

RESPONSE BRIEF OF APPELLEE HILARY THOMPSON HUTSON

Bruce D. Cohen
State Bar No. 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
Telephone: (214) 613-3726
cohenbru@msu.edu

Counsel for Appellee

surreptitiously having an incapacitated person execute documents he was legally without capacity to sign.

Having taken all the proper steps a rightful owner is supposed to undertake while a squatter has remained in her childhood home for over two years, Appellee Hilary Thompson Hutson respectfully prays that the Court affirm the summary judgment of the 296th District Court, and grant such other and further relief as the Court may deem appropriate.

This 27th day of September, 2021.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Suite 300
Dallas, Texas 75225
(972) 334-2260
cohenbru@msu.edu

WHEREFORE, Hilary Thompson Hutson respectfully prays that the Court deny the Relator's Petition for Writ of Mandamus, and grant such other and further relief as may be appropriate.

This 22d day of November, 2021.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
8117 Preston Road
Ste. 300
Dallas, Texas 75225
(214) 414-2455
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
(972) 996-2540

No. 22-1155

IN THE SUPREME COURT OF TEXAS

BRIGETTA D'OLIVIO V. HILARY THOMPSON HUTSON

**RESPONSE OF RESPONDENT HILARY THOMPSON HUTSON TO
PETITIONER'S SECOND MOTION FOR REQUEST FOR AN EXTENSION
OF TIME TO FILE PETITION FOR REVIEW**

Bruce D. Cohen
State Bar No. 24014866
6900 North Dallas Parkway
Suite 6900
Plano, Texas 75024
Telephone: (214) 214-2455
cohenbru@msu.edu

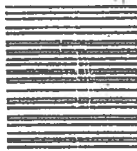
Counsel for Respondent
Hilary Thompson Hutson

Mr. Bruce D. Cohen
6900 North Dallas Parkway
Suite 6900
Plano, Texas 75024

Ms. Brigetta D'Olivio
2916 Creekbend Drive
Plano, Texas 75075



RDC 99



75075

U.S. POSTAGE PAID
FCM LETTER
PLANO, TX
75025
JAN 25, 23
AMO UNIT
\$0.63
R2305M148360-18

75075-75075



to suffer a squatter in a home she owns for nearly *four* years, ought not now encounter additional delay as a result of D'Olivio's antics.

WHEREFORE, PREMISES CONSIDERED, Respondent Hilary Thompson respectfully prays that the Court deny a further extension of time for filing of a Petition for Review, and grant such other and further relief as it may deem appropriate.

This 25th day of January, 2023.

Respectfully submitted,

/s/ Bruce D. Cohen
Bruce D. Cohen
Texas Bar No 24014866
6900 North Dallas Parkway
Suite 300
Plano, TX 75024
(214) 414-2455
cohenbru@msu.edu

LEU & PEIRCE, PLLC

/s/ Erin W. Peirce
Erin W. Peirce
State Bar No. 24058035
epeirce@leulawfirm.com
Lauren E. Olson
State Bar No. 24084729
lolson@leulawfirm.com
2313 Coit Road, Suite A
Plano, TX 75075
(972) 996-2540

EXHIBIT 12

FILE COPY

RE: Case No. 22-1155

DATE: 2/15/2023

COA #: 05-20-00969-CV

TC#: 296-04855-2019

STYLE: D'OLIVIO v. HUTSON

A petition for review was filed today in the above-styled case. Respondent may file either a response, or a waiver of response. If you file a waiver, the Court will not grant the petition without first requesting a response. (TEX. R. APP. P. 53.3) There is no fee for a response or a waiver.

MR. BRUCE DAVID COHEN
PRAVATI CAPITAL, LLC
8117 PRESTON RD STE 300
DALLAS, TX 75225-6347
* DELIVERED VIA E-MAIL *

FILE COPY

RE: Case No. 21-0799

DATE: 9/15/2021

COA #: 05-20-01118-CV

TC#: 002-02704-2020

STYLE: IN RE D'OLIVIO

A petition for writ of mandamus, as styled above, was today received and filed in the Supreme Court of Texas.

BRUCE DAVID COHEN

PRAVATI CAPITAL, LLC

8117 PRESTON RD STE 300

DALLAS, TX 75225-6347

* DELIVERED VIA E-MAIL *

EXHIBIT 13

To: Charla Kiser <ckiser@co.collin.tx.us>
Cc: Brigetta D'Olivo <beautifulhomesbybrigetta@gmail.com>
Subject: Re: Hutson v. D'Olivo, 296-04855-2019

**** WARNING: External Email. Do not click links or open attachments that are unsafe. ****

Hi, Charla,

Normally, Judge Roach's decision not to take up the reconsideration would be all that's necessary to move things along. However, the Justice of the Peace abated the forcible detainer eviction pending the District Court's ruling on the reconsideration; it's likely that, absent an order, the matter will remain abated. There is a pending Motion to Dismiss, and I will e-file a draft order (after first seeking Ms. D'Olivo's concurrence as to form), disposing of both motions and returning the matter to JP Court.

Thank you, as always, for your assistance.

Kindest regards,

Bruce

Bruce D. Cohen

Counsel for the Plaintiff

8117 Preston Road
Ste. 300
Dallas, Texas 75225
214 613-3726



From: Charla Kiser <ckiser@co.collin.tx.us>
Sent: Thursday, October 22, 2020 9:47 AM
To: Cohen, Bruce David <cohenbru@msu.edu>
Cc: Brigetta D'Olivo <beautifulhomesbybrigetta@gmail.com>
Subject: RE: Hutson v. D'Olivo, 296-04855-2019

Judge Roach made the decision not to rule on the reconsideration so I believe it expired by operation of law. I show the case is closed at this time. Please tell me what remains to be heard.

Respectfully,

Charla Robinson Kiser
Court Coordinator
296th Judicial District Court
2100 Bloomdale Rd, Ste 20012
McKinney, TX 75071

"Ethics is knowing the difference between what you have a right to do and what is right to do" –Justice Potter Stewart

You may view your case online by going to www.CollinCountyTX.gov

From: Cohen, Bruce David <cohenbru@msu.edu>
Sent: Thursday, October 22, 2020 11:41 AM
To: Charla Kiser <ckiser@co.collin.tx.us>
Subject: Re: Hutson v. D'Olivio, 296-04855-2019

***** WARNING: External Email. Do not click links or open attachments that are unsafe. *****

Charla,

The case is in JP Ruckel's precinct, Plano 3-1, but JP Missildine heard the case; he was sitting in for 3-1 that week.

Best,

Bruce

Counsel for the Plaintiff

8117 Preston Road
Ste. 300
Dallas, Texas 75225
214 613-3726

From: Charla Kiser <ckiser@co.collin.tx.us>
Sent: Thursday, October 22, 2020 11:22 AM
To: Cohen, Bruce David <cohenbru@msu.edu>
Subject: RE: Hutson v. D'Olivio, 296-04855-2019

Who is the JP?

Respectfully,

Charla Robinson Kiser
Court Coordinator
296th Judicial District Court
2100 Bloomdale Rd, Ste 20012
McKinney, TX 75071



"Ethics is knowing the difference between what you have a right to do and what is right to do" –Justice Potter Stewart

You may view your case online by going to www.CollinCountyTX.gov
Please check all settings and status of orders online prior to contacting the court. Please file all correspondence directly with the District Clerk's Office; I cannot accept filings via email.

From: Cohen, Bruce David <cohenbru@msu.edu>
Sent: Thursday, October 22, 2020 10:23 AM

Karen Hafner

From: Brooke Wiggins
Sent: Tuesday, October 27, 2020 10:09 AM
To: Karen Hafner
Subject: FW: Hutson v. D'Olivio, 296-04855-2019

Brooke M. Wiggins
Court Administrator
Justice Court 3-1
Collin County
972-881-3008(ph)
972-881-3157(fax)
www.collincountytx.gov
<http://selfhelp.efiletexas.gov/srl>

Legal questions cannot be answered by the above clerk. If you have legal questions, please contact an attorney.

From: Charla Kiser
Sent: Tuesday, October 27, 2020 9:58 AM
To: Brooke Wiggins
Cc: 'Bruce Cohen'
Subject: FW: Hutson v. D'Olivio, 296-04855-2019

Hi Brooke,

The above case is closed in our court and the Motion for Reconsideration was not heard by Judge Roach and has now expired by operation of law.
What is needed by your office, from this court, for Mr. Cohen to move forward with his requested Writ of Possession?

Respectfully,

Charla Robinson Kiser
Court Coordinator
296th Judicial District Court
2100 Bloomdale Rd, Ste 20012
McKinney, TX 75071



"Ethics is knowing the difference between what you have a right to do and what is right to do" -Justice Potter Stewart

You may view your case online by going to www.CollinCountyTX.gov
Please check all settings and status of orders online prior to contacting the court. Please file all correspondence directly with the District Clerk's Office; I cannot accept filings via email.

EXHIBIT 14



Brigetta D'Olivio-Thompson <bd2916@gmail.com>

Thompson Est - 2nd try

Alex Chucri <alex@pravaticapital.com>

Mon, Nov 22, 2021 at 9:24 AM

To: Steve King <texprob8@att.net>, "Samuel M. Hodges" <shodges@fordbergner.com>, Kelcie Hibbs <khibbs@loewarren.com>, Julie Reedy <juliereedylaw@gmail.com>, Brigetta Ann d'Olivio <bd2916@gmail.com>, Erin Peirce <epeirce@leulawfirm.com>, Bruce Cohen <cohen@pravaticapital.com>, Brian Thomas <brian@ptllaw.com>
Cc: Connie Evans <cevens@collincountytx.gov>

Please delete Bruce Cohen form this list.

ALEXANDER CHUCRI

CEO

O +1 (844) 772-8284

PRAVATI CAPITAL



SCOTTSDALE . LOS ANGELES . NEW YORK . MIAMI . DALLAS . CHICAGO

This message and its content are confidential and may be privileged and are intended only for the addressee. If you are not the intended recipient, please communicate to the sender and delete this message and any attachment or content from your systems. If this email has been sent to you in error please destroy and not copy this message or disclose the contents to any other entity. This is not an offering of securities.

[Quoted text hidden]



Brigetta D'Olivio-Thompson <bdt2916@gmail.com>

Thompson Est - 2nd try

Julie Reedy <juliereedylaw@gmail.com>

Mon, Nov 22, 2021 at 9:30 AM

To: Alex Chucri <alex@pravaticapital.com>

Cc: Steve King <texprob8@att.net>, "Samuel M. Hodges" <shodges@fordbergner.com>, Kelcie Hibbs <khilbs@loewarren.com>, Brigetta Ann d'Olivio <bdt2916@gmail.com>, Erin Peirce <epeirce@leulawfirm.com>, Bruce Cohen <cohen@pravaticapital.com>, Brian Thomas <brian@ptilaw.com>, Connie Evans <cevans@collincountytx.gov>

I am getting the please wait information for the new ID.. julie reedy

[Quoted text hidden]



Brigetta D'Olivo-Thompson <bdt2916@gmail.com>

Assignment of the Hon. Bonnie Robison

Alex Chucri <alex@pravaticapital.com>

Thu, Dec 2, 2021 at 10:53 AM

To: "Don D. Ford III" <dford@fordbergner.com>

Cc: Brigetta D'Olivo-Thompson <bdt2916@gmail.com>, Connie Evans <cevans@co.collin.tx.us>, Steve King <texprob8@att.net>, Bruce Cohen <cohen@pravaticapital.com>, "epeirce@leulawfirm.com" <epeirce@leulawfirm.com>, "khibbs@loewarren.com" <khibbs@loewarren.com>, "brian@ptllaw.com" <brian@ptllaw.com>, "juliereedylaw@gmail.com" <juliereedylaw@gmail.com>

Pls delete your communication to Bruce Choen.

ALEXANDER CHUCRI
CEO
PRAVATI CAPITAL
O +1 (844) 772-8284

SCOTTSDALE . LOS ANGELES . NEW YORK . MIAMI . DALLAS . CHICAGO

This message and its content are confidential and may be privileged and are intended only for the addressee. If you are not the intended recipient, please communicate to the sender and delete this message and any attachment or content from your systems. If this email has been sent to you in error please destroy and not copy this message or disclose the contents to any other entity. This is not an offering of securities.

On Dec 2, 2021, at 9:51 AM, Don D. Ford III <dford@fordbergner.com> wrote:

What is the basis of your objection to Judge Robison?

[Quoted text hidden]

EXHIBIT 15



Brigetta D'Olivia-Thompson <bdt2916@gmail.com>

Re: 21-0799 - IN RE D'OLIVIO - Motion to Extend Time to File Reply filed

Cohen, Bruce David <cohenbru@msu.edu>

Wed, Dec 1, 2021 at 2:14 PM

To: Alexander Claycomb <Alexander.Claycomb@txcourts.gov>

Cc: Lauren Olson <lolson@leulawfirm.com>, Erin Peirce <epeirce@leulawfirm.com>, "bdt2916@gmail.com" <bdt2916@gmail.com>

Mr. Claycomb,

Hilary Thompson Hutson, the Real Party in Interest in the above-referenced matter, does not intend to file a response to "Relator's Emergency Motion for Permission to Extend Time to File Relator's Reply." The pro se Relator informed undersigned counsel by message of the filing, but did not seek consent or inquire as to opposition. Ms. Hutson takes no position on the motion.

With best wishes for the holidays, we are,

Very truly yours,

Bruce D. Cohen

Counsel for Real Party in Interest
Hilary Thompson Hutson

6900 Dallas Parkway

Suite 300

Plano, Texas 75024

(214) 414-2455

[Please note new address and telephone number]

From: Alexander Claycomb <Alexander.Claycomb@txcourts.gov>

Sent: Wednesday, December 1, 2021 1:39 PM

To: lolson@leulawfirm.com <lolson@leulawfirm.com>; epeirce@leulawfirm.com <epeirce@leulawfirm.com>; brcohen@mlaglobal.com <brcohen@mlaglobal.com>; Cohen, Bruce David <cohenbru@msu.edu>

Subject: 21-0799 - IN RE D'OLIVIO - Motion to Extend Time to File Reply filed

Dear Counsel,

Today the Supreme Court of Texas received and filed the attached Motion for Extension of Time to file Reply in Support of Petition for Writ of Mandamus in the above-styled case. Relator indicated that this motion is opposed. Please indicate whether a response to the motion will be filed. Any response should be filed within three business days. Please note, if no reply to this email is received within 24 hours, action may be taken on the motion.

Thank you for your assistance,



Alexander T. Claycomb | Deputy Clerk
Supreme Court of Texas

201 West 14th Street Rm. 104 | Austin, TX 78701

Phone (512) 463-1312 ext. 41362 | Fax (512) 463-1365

alexander.claycomb@txcourts.gov

Re: 22-1155 - D'OLIVIO v. HUTSON - Second Motion for Extension of Time to File Petition for Review filed

Cohen, Bruce David <cohenbru@msu.edu>
To: Alexander Claycomb <Alexander.Claycomb@txcourts.gov>
Cc: "BDT2916@gmail.com" <bdt2916@gmail.com>

Mon, Jan 23, 2023 at 1:13 PM

Dear Mr. Claycomb,

Thank you for your email of earlier today regarding the above-referenced Appellant's Second Motion for Extension of Time to File Petition for Review. Appellee Hilary Thompson Hutson opposes the Motion and will file a brief response within the time prescribed, unless the Motion is earlier acted upon by the Court.

Respectfully,

Bruce D. Cohen
Texas Bar No. 24014866
Counsel for Appellee

6900 North Dallas Parkway
Suite 6900
Dallas, Texas 75024
(214) 414-2455

From: Alexander Claycomb <Alexander.Claycomb@txcourts.gov>
Sent: Monday, January 23, 2023 12:23 PM
To: brcohen@mlaglobal.com <brcohen@mlaglobal.com>; Cohen, Bruce David <cohenbru@msu.edu>
Subject: 22-1155 - D'OLIVIO v. HUTSON - Second Motion for Extension of Time to File Petition for Review filed

Dear Counsel,

Today the Supreme Court of Texas received and filed the attached Second Motion for Extension of Time to file Petition for Review in the above-styled case. Please let me know whether the motion for extension is opposed or unopposed. If opposed, please indicate whether a response to the motion will be filed. Any response should be filed within three business days. Please note, if no reply to this email is received within 24 hours, action may be taken on the motion. Thank you for your assistance,



Alexander T. Claycomb | Deputy Clerk
Supreme Court of Texas

201 West 14th Street Rm. 104 | Austin, TX 78701
Phone (512) 463-1312 ext. 41362 | Fax (512) 463-1365
alexander.claycomb@txcourts.gov

EXHIBIT 16

Party	Party Type	Representative
Thompson Hutson, Hilary	Real Party in Interest	Mr. Bruce David Cohen Ms. Erin W. Peirce Lauren Olson
Fifth District Court of Appeals of Texas	Respondent	Brigetta D'Olivio Mr. Niles Stefan Illich
D'Olivio, Brigetta	Relator	

COURT OF APPEALS INFORMATION:

COA Case

05-20-01118-CV

Disposition

Opinion Cite

COA District

5th Court of Appeals

COA Justice

TRIAL COURT INFORMATION

Court

County Court at Law No 2

County

Collin

Date	Event Type	Disposition	Remarks	Document	
03/04/2022	Case Stored Petition for Writ of Mandamus disposed	Denied	e-stored	[PDF/40 KB]	Notice
01/28/2022	Miscellaneous motion disposed. See Remarks.	Filing granted	Emergency Motion for Permission to file Supplemental Reply to Response to Petition for Writ of Mandamus is granted.	[PDF/40 KB]	Notice
01/06/2022	Supplement to document	Filing granted	Supplemental Reply to Response to Petition for Writ of Mandamus filed on behalf of Brigetta D'Olivio.	[PDF/4.78 MB]	
01/05/2022	Miscellaneous Motion	Filing granted	Emergency Motion for Permission to File Supplemental Reply to Real Party in Interest's Response to Petition for Writ of Mandamus filed on behalf of Brigetta D'Olivio.	[PDF/508 KB]	
12/23/2021	Reply to Petition for Writ of Mandamus	Filing granted	Reply to Response to Petition for Writ of Mandamus filed on behalf of Brgetta D'Olivio.	[PDF/65 KB]	Notice
12/03/2021	MET to file reply disposed of	Filing granted	Motion for Extension of Time to file Reply in Support of Petition for Writ of Mandamus is granted. Rely is due December 15, 2021. FURTHER REQUESTS FOR EXTENSIONS OF TIME FOR THIS FILING WILL BE DISFAVORED.	[PDF/457 KB]	Notice
12/01/2021	Electronic communication sent to Party	Filing granted	Email sent to counsel for Real Parties in Interest to determine stance on Motion for Extension of Time.	[PDF/4.84 MB]	
12/01/2021	Motion to Extend Time to File Reply filed	Filing granted	Motion for Extension of Time to file Reply in Support of Petition for Writ of Mandamus filed on behalf of Brigetta D'Olivio.	[PDF/113 KB]	Notice
11/22/2021	Response to Petition for Writ of Mandamus Filed	Filing granted	Response to Petition for Writ of Mandamus filed on behalf of Hilary Thompson Hutson.	[PDF/4.84 MB]	
10/22/2021	Supreme Court of Texas Requested Response	Filing granted	Requested response to petition for writ of mandamus due no later than November 22, 2021.	[PDF/113 KB]	Notice

Date	Event Type	Disposition	Remarks	Document
09/21/2021	Case forwarded to Court			
09/17/2021	Document filed (see remarks)		Amended Certificate of Service filed on behalf of Brigetta D'Olivio. [PDF/74 KB]	
09/17/2021	Document filed (see remarks)		Certificate of Service filed on behalf of Brigetta D'Olivio. [PDF/79 KB]	
09/15/2021	Case Record Filed		Mandamus Record filed on behalf of Brigetta D'Olivio. Not posted to website, too voluminous to redact.	
09/15/2021	Petition for Writ of Mandamus filed		Petition for Writ of Mandamus filed on behalf of Brigetta D'Olivio. [PDF/6.01 MB]	Notice [PDF/40 KB]
09/15/2021	Clerk's Record			
09/15/2021	Clerk's Record			
09/15/2021	Clerk's Record			
09/15/2021	Clerk's Record			
09/15/2021	Court reporter/recorder's record			
09/15/2021	Clerk's Record			
09/15/2021	Court reporter/recorder's record			
09/15/2021	Clerk's Record			

CALENDARS

Set Date	Calendar Type	Reason Set	Remarks
03/04/2022	Case Stored	Case stored.	e-stored

PARTIES

Case:

21-0799

Date Filed:

09/15/2021

Case Type:

Petition for Writ of Mandamus

Style:

IN RE BRIGGETTA DOLIVIO

v.:

APPELLATE BRIEFS

Date	Event Type	Description	Remarks	Document
12/23/2021	Reply to Petition for Writ of Mandamus	Relator	Reply to Response to Petition for Writ of Mandamus filed on behalf of Brgetta D'Olivio.	
11/22/2021	Response to Petition for Writ of Mandamus Filed	Real Parties in Interest	Response to Petition for Writ of Mandamus filed on behalf of Hilary Thompson Hutson.	[PDF/484 MB]
09/15/2021	Petition for Writ of Mandamus filed	Relator	Petition for Writ of Mandamus filed on behalf of Brigetta D'Olivio.	[PDF/601 MB] [PDF/40 KB] Notice

CASE EVENTS

Court Judge

Honorable Barnett Walker

Court Case

002-02704-2020

Reporter

Punishment

To view or print PDF files you must have the Adobe Acrobat® reader. This software may be obtained without charge from Adobe. Download the reader from the Adobe Web site

EXHIBIT 17

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rhonda Connolly on behalf of Erin Peirce
Bar No. 24058035
rconnolly@leulawfirm.com
Envelope ID: 62924955
Status as of 3/24/2022 2:36 PM CST

Associated Case Party: HilaryThompsonHutson

Name	BarNumber	Email	TimestampSubmitted	Status
Erin WPeirce		epeirce@leulawfirm.com	3/24/2022 1:50:54 PM	SENT

Associated Case Party: Brigetta D'Olivio

Name	BarNumber	Email	TimestampSubmitted	Status
Jac Schuster	24075038	jac@jacschuster.com	3/24/2022 1:50:54 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kelcie Augusta Hibbs	9567450	kelciehibbs@outlook.com	3/24/2022 1:50:54 PM	SENT
Bruce David Cohen	24014866	brcohen@mglglobal.com	3/24/2022 1:50:54 PM	SENT
Don Duane Ford	24002101	dford@fordbergner.com	3/24/2022 1:50:54 PM	SENT
Lori A. Leu	12243550	lleu@leulawfirm.com	3/24/2022 1:50:54 PM	SENT
Laura Chavero	24091221	lchavero@chaverolaw.com	3/24/2022 1:50:54 PM	SENT
Zachary Stubblefield	24110420	zach@moneylawfirm.net	3/24/2022 1:50:54 PM	SENT
Lauren EOlson		lolson@leulawfirm.com	3/24/2022 1:50:54 PM	SENT
Judge Steve King		texprob8@att.net	3/24/2022 1:50:54 PM	SENT

Associated Case Party: TimothyC.Thompson

Name	BarNumber	Email	TimestampSubmitted	Status
Jessica Porter		Jessica@ptllaw.com	3/24/2022 1:50:54 PM	SENT
J. Brian Thomas		brian@ptllaw.com	3/24/2022 1:50:54 PM	SENT

Associated Case Party: DonD.Ford

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rhonda Connolly on behalf of Erin Peirce
Bar No. 24058035
rconnolly@leulawfirm.com
Envelope ID: 62924955
Status as of 3/24/2022 2:36 PM CST

Associated Case Party: DonD.Ford

Name	BarNumber	Email	TimestampSubmitted	Status
Samuel Hodges	24106102	shodges@fordbergner.com	3/24/2022 1:50:54 PM	SENT

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rhonda Connolly on behalf of Erin Peirce
Bar No. 24058035
rconnolly@leulawfirm.com
Envelope ID: 62926234
Status as of 3/24/2022 2:46 PM CST

Associated Case Party: TimothyC.Thompson

Name	BarNumber	Email	TimestampSubmitted	Status
Sarah Toraason		sarah@ptllaw.com	3/24/2022 2:07:48 PM	SENT
Jessica Porter		Jessica@ptllaw.com	3/24/2022 2:07:48 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Bruce D.Cohen		bruce.cohen@pepsico.com	3/24/2022 2:07:48 PM	SENT
Lauren EOlson		lolson@leulawfirm.com	3/24/2022 2:07:48 PM	SENT

Associated Case Party: Cindy Carmichael

Name	BarNumber	Email	TimestampSubmitted	Status
Brian Thomas		brian@ptllaw.com	3/24/2022 2:07:48 PM	SENT

Associated Case Party: Hilary Hutson

Name	BarNumber	Email	TimestampSubmitted	Status
Erin WPeirce		epeirce@leulawfirm.com	3/24/2022 2:07:48 PM	SENT

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rhonda Connolly on behalf of Erin Peirce
Bar No. 24058035
rconnolly@leulawfirm.com
Envelope ID: 62925277
Status as of 3/24/2022 2:46 PM CST

Associated Case Party: RichardW.Thompson

Name	BarNumber	Email	TimestampSubmitted	Status
W.D. Masterson		wdm@kilgorelaw.com	3/24/2022 1:55:03 PM	SENT
Rebecca Baird		rlb@kilgorelaw.com	3/24/2022 1:55:03 PM	SENT
Julie Reedy		juliereedylaw@gmail.com	3/24/2022 1:55:03 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kenneth A.Krohn		kkrohn@fordbergner.com	3/24/2022 1:55:03 PM	SENT
Alfred Christian Klemme	11567975	cklemme@happybank.com	3/24/2022 1:55:03 PM	SENT
Heather Bell	24099799	heather@dfwprobatelaw.com	3/24/2022 1:55:03 PM	SENT
Charles Lee Daugherty		charles.daugherty@hklaw.com	3/24/2022 1:55:03 PM	SENT
Lori A. Leu	12243550	lleu@leulawfirm.com	3/24/2022 1:55:03 PM	SENT
Samuel Hodges	24106102	shodges@fordbergner.com	3/24/2022 1:55:03 PM	SENT
Sarah Toraason		sarah@ptllaw.com	3/24/2022 1:55:03 PM	SENT
Erin W.Peirce		epeirce@leulawfirm.com	3/24/2022 1:55:03 PM	SENT
J. Brian Thomas		brian@ptllaw.com	3/24/2022 1:55:03 PM	SENT
Lauren EOlson		lolson@leulawfirm.com	3/24/2022 1:55:03 PM	SENT
Kelcie AHibbs		khibbs@loewarren.com	3/24/2022 1:55:03 PM	SENT
Don DFord, III		dford@fordbergner.com	3/24/2022 1:55:03 PM	SENT
Kelcie AHibbs		khibbs@lowarren.com	3/24/2022 1:55:03 PM	SENT
Bruce Cohen		cohen@pravaticapital.com	3/24/2022 1:55:03 PM	SENT
Brigetta D'Olivio		bdt2916@gmail.com	3/24/2022 1:55:03 PM	SENT

Associated Case Party: Brigetta D'Olivio

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Bruce Cohen on behalf of Bruce Cohen
Bar No. 24014866
cohenbru@msu.edu
Envelope ID: 50522482
Status as of 2/10/2021 9:50 AM CST

Associated Case Party: HilaryThompsonHutson

Name	BarNumber	Email	TimestampSubmitted	Status
Erin Peirce		epeirce@leulawfirm.com	2/10/2021 9:48:52 AM	SENT
Bruce Cohen		cohenbru@msu.edu	2/10/2021 9:48:52 AM	SENT
Hilary ThompsonHutson		hilaryhutson2@gmail.com	2/10/2021 9:48:52 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Lauren Olson		lolson@leulawfirm.com	2/10/2021 9:48:52 AM	SENT

Associated Case Party: Brigetta D'Olivio

Name	BarNumber	Email	TimestampSubmitted	Status
BRIGETTA D'OLIVIO		bdt2916@gmail.com	2/10/2021 9:48:52 AM	SENT

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Rhonda Connolly on behalf of Erin Peirce
Bar No. 24058035
rconnolly@leulawfirm.com
Envelope ID: 62925277
Status as of 3/24/2022 2:46 PM CST

Associated Case Party: Brigetta D'Olivio

Name	BarNumber	Email	TimestampSubmitted	Status
Brigetta D'Olivio		beautifulhomesbybrigetta@gmail.com	3/24/2022 1:55:03 PM	SENT

Associated Case Party: Cindy Carmichael

Name	BarNumber	Email	TimestampSubmitted	Status
Jessica Porter		Jessica@ptllaw.com	3/24/2022 1:55:03 PM	SENT

NOTICE TO CEASE AND DESIST

Brigetta D'Olivio
2916 Creekbend Dr.
Plano, TX 75075
214.733.7204
BDT2916@gmail.com

Pravati Capital, LLC
8117 Preston Rd. Ste. 300
Dallas, TX 75225
Attn.: Bruce D. Cohen
cohen@pravaticapital.com
cohenbru@msu.edu

December 23, 2020
VIA FED-EX
181878665006

Re: NOTICE TO CEASE AND DESIST THE UNAUTHORIZED USE OF THE NAME & EMAIL ADDRESS(ES) FOR BRIGETTA D'OLIVIO

Dear Mr. Cohen,

This is a formal demand that you cease and desist the unauthorized use of my name and email address(es) for any EFSP services.

Brigetta D'Olivio has never consented to e-service nor has she ever registered for the e-service option with any EFSP.

Further, Brigetta D'Olivio has never set-up a complimentary account through the website of Texas.gov., nor has she ever registered her email with any electronic filing manager or any EFSP.

On multiple occasions and as far back as October 2019 to present day, you were made expressly aware, in writing, that Brigetta D'Olivio is not an e-filer, that she is not required to file as an e-filer with any EFSP; that her email address(es), was therefore, not a "designated email address(es)" for e-file purposes with any EFSP; that she has never consented to e-service; that she has never given permission, nor authorization to any person(s) nor entity to register and/or use her name and email address(es) with any EFSP nor to register them with any EFSP; and that the use of her name and/or email address(es) with any EFSP, without authorization and/or written permission from her, would constitute identity theft and fraud.

Respectfully Yours,


Brigetta D'Olivio

2nd & FINAL NOTICE TO CEASE AND DESIST

Brigetta D'Olivio
2916 Creekbend Dr.
Plano, TX 75075
214.733.7204
BDT2916@gmail.com

Pravati Capital, LLC
8117 Preston Rd. Ste. 300
Dallas, TX 75225
Attn.: Bruce D. Cohen
cohen@pravaticapital.com
cohenbru@msu.edu

January 23, 2021

VIA FED-EX

772711745054

Re: 2nd & FINAL NOTICE TO CEASE AND DESIST, THE UNAUTHORIZED USE OF THE NAME & EMAIL ADDRESS(ES) FOR BRIGETTA D'OLIVIO

Dear Mr. Cohen,

This is a 2nd and Final Notice that you cease and desist the unauthorized use of my name and email address(es) for any EFSP services.

Respectfully Yours,


Brigetta D'Olivio

THIS SPACE LEFT INTENTIONALLY BLANK

Remove Service Contact Request Form

Jared (Tyler Technologies) <support@odysseyfileandserve.zendesk.com>

Thu, Dec 17, 2020 at 1:36 PM

Reply-To: Tyler Technologies <support+id38701@odysseyfileandserve.zendesk.com>

To: Brigetta D'Olivio <bdt2916@gmail.com>

This ticket was created on your behalf.

Jared (Odyssey File and Serve)

Dec 17, 2020, 1:36 PM CST

Hello Brigetta,

This is what I found, in relation to the service notification you received. I see your email listed as a service contact on this case, which is why the notification was sent.

Service Contact Details for the Party: Brigetta D'Olivio - Defendant**First Name**

Brigetta

Middle Name**Last Name**

D'Olivio

Email

bdt2916@gmail.com

Administrative Copy**Firm Name****Address****Country**

United States of America

Phone Number**Created By****Firm Name:** Bruce D Cohen**Phone:** 972 334-2260**Address:** 7701 Legacy Drive. MC
3A-130C

Plano, Texas 75024

To process your request to remove a service contact from a case, please complete all the fields

below.

1. Requesters Full Name:
2. Efiling State:
3. Court and County Name (i.e., XX County District/County Court):
4. Case Number:
5. Name AND eMail to be Removed:
6. Firm Name:
7. Reason for Removal:

Please Note: We can only remove service contact from your firm. If a service contact from another firm needs to be removed, please contact that firm to have that contact removed.

Once the information above is completed and returned, your request will be processed.

NOTE: If upon receipt of your removal request, we discover the contact was attached to the case by the court, we will not be able to remove it. In this situation, we will advise you to contact the court directly to have the contact removed.

Thank you,

Jared
Odyssey File and Serve Technical Support

To add additional comments, reply to this email.

[Z322GG-7Y0D]



Brigetta D'Olivio-Thompson <bdt2916@gmail.com>

[Tyler Technologies] Re: Jared, On multiple occasion, I have had to reques...

Jared (Tyler Technologies) <support@odysseyfileandserve.zendesk.com>
Reply-To: Tyler Technologies <support+id54060@odysseyfileandserve.zendesk.com>
To: Brigetta D'Olivio <bdt2916@gmail.com>

Fri, Jan 29, 2021 at 1:30 PM

Your request (54060) has been updated. To add additional comments, reply to this email.

Jared (Odyssey File and Serve)

Jan 29, 2021, 1:30 PM CST

Hello Brigetta,

Thank you for contacting Tyler Technologies eFile technical support!

A service contact is someone who has elected to be served via email with documents that have been filed into cases. On the e-filing site each person who wants to receive eService needs to add themselves to the service contact list for each case, this will ensure that email notifications can be sent to them when a filing in a case is eFiled & served. It is advised to only add contact information for you or your firm, and not for opposing parties.

I am not sure what database is being referred to by Bruce in your email, but we don't require service contacts to be set up, it's only meant as an option if needing to send electronic service. It is the responsibility of each party to set their own information up for eService if they wish to receive service electronically. If Bruce is under the impression that we are requesting personal information for another party on his case, I would recommend having Bruce reach out to us, or to the court for assistance and clarification.

Please feel free to reach out to us if you have any questions.

Thank you,

Jared

[Quoted text hidden]

[Quoted text hidden]

[6LY80L-D04Q]

