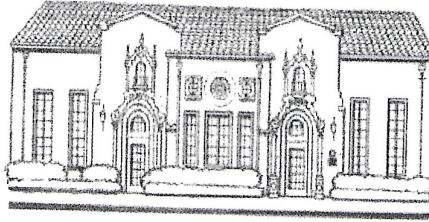


# LAW OFFICE OF KURT STEPHEN, P.L.L.C.

A T T O R N E Y  
100 SOUTH BICENTENNIAL  
MCALLEN, TEXAS 78501-7050  
A TEXAS HISTORIC LANDMARK



KURT STEPHEN  
MAIL [kurt@kstephenlaw.com](mailto:kurt@kstephenlaw.com)  
TELEPHONE (956) 631-3381  
FACSIMILE (956) 402-3001

February 9, 2023

Juan Garcia

Re: Jay Humphreys, et al  
Case No. 18-10375  
Adversary No. 19-1001

Mr. Garcia,

Pursuant to our telephone conversation on Wednesday, February 8, 2023 you authorized, Vanessa, to pick up the originals of the following documents and she will deliver them to Mr. Dennis Longoria:

1. One (1) Original Certified Doc.#24-Agreed Judgment No. 1 in Adversary No. 19-01001; (we will only retain a copy for our file);
2. One (1) Original Certified Doc.#25-Agreed Judgment No. 2 in Adversary No. 19-01001; (we will only retain a copy for our file);
3. Two (2) Original Abstract of Judgment of Agreed Judgment No. 1 in Adversary No. 19-01001; (we will only retain a copy for our file);
4. Two (2) Original Abstract of Judgment of Agreed Judgment No. 2 in Adversary No. 19-01001; (we will only retain a copy for our file);

Thank you for your attention in this matter.

Originals Picked-Up

A handwritten signature in black ink, appearing to be 'Vanessa', written over a horizontal line.

Vanessa on behalf of Juan Garcia  
February \_\_\_\_, 2023

Very Truly Yours,  
*The Law Office of Kurt Stephen, PLLC*

By: 

KURT STEPHEN

KS:vc

enclosures as stated above

cc: File



ENTERED  
12/19/2019

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

**JAY CHRISTOPHER HUMPHREYS,**  
et al.  
*Debtors*

www.ck12.org

**Case No. 18-10375**

## Chapter 12

**JUAN GARCIA, JR., Individually  
JUAN GARCIA, JR., TRUSTEE OF  
THE MEU 2012 TRUST FOR J.  
GARCIA, CELINA GARCIA-  
ANDERSON, TRUSTEE OF THE MEU  
2012 TRUST FOR C. GARCIA,  
MARIA ELENA USEDÁ, Individually  
*Plaintiffs***

~~~~~

**Adversary No. 19-1001**

VS.

**JAY CHRISTOPHER HUMPHREYS,  
SAN QUINTIN VALLEY FARMS LLC,  
JJ SAN JOSE DE BAJA, LP**  
*Defendants*

**AGREED JUDGMENT No. 1**

On this day came on for consideration the above-styled and numbered adversary proceeding, and came the parties, by and through their respective attorneys of record. The Court having examined the record filed herein, having been apprised by the parties that they have entered into a Compromise and Settlement Agreement resolving the dispute between the parties, and that the parties agree to the entry of this *Agreed Judgment*, is of the opinion that the following *Agreed Judgment* should be entered in this adversary proceeding. Jay Christopher Humphreys agrees that the Court should sign and cause to be entered this *Agreed Judgment* in favor of JUAN GARCIA, JR., TRUSTEE OF THE MEU 2012 TRUST FOR J. GARCIA, CELINA GARCIA-ANDERSON, TRUSTEE OF THE MEU 2012 TRUST FOR C. GARCIA, and MARIA ELENA USEDÁ, Individually. Furthermore, the parties agree and consent to the entry of this judgment as non-dischargeable based on the provisions of 11 U.S.C. section 523(a)(4), and agree to the following stipulated facts:

TRUE COPY I CERTIFY  
ATTEST:  
NATHAN OCHSNER, CLERK

By [Signature]  
Deputy Clerk

1. The parties entered into an operating agreement involving the management and governance of the Texas Limited Liability company known as JJ DE BAJA, LLC;
2. The operating agreement contains a prohibition relating to conflicts of interest found in article 12 which specifically prohibits any member, manager, or officer of the company from engaging in or participating in business ventures of any kind or description independently without adequate notice and opportunity for the other members, managers and officers to participate;
3. Jay Humphreys failed to adequately disclose his intent to open and operate San Quintin Valley Farms, LLC and San Quintin, Mexico prior to organizing and beginning operations;
4. The failure to adequately provide notice to the other members, managers and officers of JJ DE BAJA, LLC resulted in a breach of his fiduciary duties and also violated a similar provision found in the Limited Partnership Agreement which prohibits the individual partners from taking actions which would be harmful to operations of the partnership or make it difficult or impossible for the partnership to carry out its ordinary business, and as a result of the operations of San Quintin Valley Farms, Jay Humphreys, as a member of the partnership, used assets of the partnership for himself without authority to do so.
5. All of these actions resulted in a breach of fiduciary duties under both the Company Agreement of JJ DE BAJA, LLC and the Limited Partnership Agreement of JJ SAN JOSE DE BAJA, L.P.

It is therefore ORDERED, ADJUDGED, AND DECREED that:

1. This Court has jurisdiction over the parties and subject matter of this adversary proceeding;
2. That the parties have entered into a Compromise and Settlement Agreement resolving the disputes between the parties;
3. JUAN GARCIA, JR., TRUSTEE OF THE MEU 2012 TRUST FOR J. GARCIA recover judgment of and from Jay Christopher Humphreys, for actual damages in the amount of \$730,966.65.



4. CELINA GARCIA-ANDERSON, TRUSTEE OF THE MEU 2012 TRUST FOR C. GARCIA recover judgment of and from Jay Christopher Humphreys, for actual damages in the amount of \$553,686.02.

5. MARIA ELENA USEDÁ, Individually, recover judgment of and from Jay Christopher Humphreys, for actual damages in the amount of \$520,649.00.

6. Post judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered.

7. This Agreed Judgment is non-dischargeable based on the provisions of 11 U.S.C. section 523(a)(4).

8. The parties agree to waive the right to file any appeal of this Agreed Judgment.

9. The parties agree to waive the right to file a motion for new trial.

It is further ordered that all writs and process for the enforcement and collection of this *Agreed Judgment* may issue as necessary. In connection with any Writ of Execution in this case, the Court directs the United States Marshals Service to use any means or force reasonably necessary to satisfy this *Agreed Judgment*.


All relief not expressly granted herein and in Agreed Judgment No. 2 is denied. This Judgment and Agreed Judgment No. 2 finally disposes of all claims and all parties.

It is so ORDERED.

SIGNED this 18 day of December, 2019.

  
Eduardo V. Rodriguez, Bankruptcy Judge

AGREED:

  
JAY CHRISTOPHER HUMPHREYS

**APPROVED AS TO FORM AND SUBSTANCE:**

MULLIN HOARD & BROWN, L.L.P.

P.O. Box 2585

Lubbock, Texas 79408-2585

Telephone: (806)765-7491

Facsimile: (806) 765-0553

Email: [an@mhba.com](mailto:an@mhba.com)

By: 

David R. Langston, SBN: 11923800

Southern District Bar No. 9489

*Attorneys for Jay Humphreys, San Quintin Valley Farms, LLC,  
And San Quintin Valley Farms S. de R.L. de C.V.*

Dennis A. Longoria, Attorney at Law

1101 Chicago Avenue

Telephone: (956) 682-2440

Facsimile: (956)682-0820

Email: [Dennis@Ekrattorneys.com](mailto:Dennis@Ekrattorneys.com)

By: 

Dennis A. Longoria, SBN 24003915

*Attorney for Juan Garcia Jr., Individually, Juan Garcia Jr. Trustee of the MEU 2012 Trust  
for J. Garcia, Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia, Maria  
Elena Useda, Individually*

1

1. The parties entered into an operating agreement involving the management and governance of the Texas Limited Liability company known as JJ DE BAJA, LLC;
2. The operating agreement contains a prohibition relating to conflicts of interest found in article 12 which specifically prohibits any member, manager, or officer of the company from engaging in or participating in business ventures of any kind or description independently without adequate notice and opportunity for the other members, managers and officers to participate;
3. Jay Humphreys failed to adequately disclose his intent to open and operate San Quintin Valley Farms, LLC and San Quintin, Mexico prior to organizing and beginning operations;
4. The failure to adequately provide notice to the other members, managers and officers of JJ DE BAJA, LLC resulted in a breach of his fiduciary duties and also violated a similar provision found in the Limited Partnership Agreement which prohibits the individual partners from taking actions which would be harmful to operations of the partnership or make it difficult or impossible for the partnership to carry out its ordinary business, and as a result of the operations of San Quintin Valley Farms, Jay Humphreys, as a member of the partnership, used assets of the partnership for himself without authority to do so.
5. All of these actions resulted in a breach of fiduciary duties under both the Company Agreement of JJ DE BAJA, LLC and the Limited Partnership Agreement of JJ SAN JOSE DE BAJA, L.P.

It is therefore ORDERED, ADJUDGED, AND DECREED that:

1. This Court has jurisdiction over the parties and subject matter of this adversary proceeding;
2. That the parties have entered into a Compromise and Settlement Agreement resolving the disputes between the parties;
3. JUAN GARCIA, JR., Individually, recover judgment of and from Jay Christopher Humphreys, for actual damages in the amount of \$500,000.00.
4. Post judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered.



5. This Agreed Judgment is non-dischargeable based on the provisions of 11 U.S.C. section 523(a)(4).

6. The parties agree to waive the right to file any appeal of this Agreed Judgment.

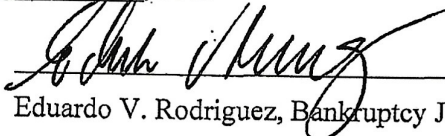
7. The parties agree to waive the right to file a motion for new trial.

It is further ordered that all writs and process for the enforcement and collection of this *Agreed Judgment* may issue as necessary. In connection with any Writ of Execution in this case, the Court directs the United States Marshals Service to use any means or force reasonably necessary to satisfy this *Agreed Judgment*.


All relief not expressly granted herein and in Agreed Judgment No. 1 is denied. This Judgment and Agreed Judgment No. 1 finally disposes of all claims and all parties.

It is so ORDERED.

SIGNED this 19 day of December, 2019

  
Eduardo V. Rodriguez, Bankruptcy Judge

AGREED:

  
JAY CHRISTOPHER HUMPHREYS

APPROVED AS TO FORM AND SUBSTANCE:

MULLIN HOARD & BROWN, L.L.P.

P.O. Box 2585

Lubbock, Texas 79408-2585

Telephone: (806) 765-7491

Facsimile: (806) 765-0533

Email: [arl@mhb.com](mailto:arl@mhb.com)

By 

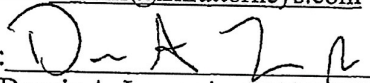
David R. Langston, SBN: 11923800

Southern District Bar No. 9489

*Attorneys for Jay Humphreys, San Quintin Valley Farms, LLC,  
And San Quintin Valley Farms S. de R.L. de C.V.*



Dennis A. Longoria, Attorney at Law  
1101 Chicago Avenue  
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Facsimile: (956) 682-0820  
Email: [Dennis@Ekrattorneys.com](mailto:Dennis@Ekrattorneys.com)

By:   
Dennis A. Longoria, SBN 24003915

*Attorney for Juan Garcia Jr., Individually, Juan Garcia Jr. Trustee of the MEU 2012 Trust  
for J. Garcia, Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia, Maria  
Elena Useda, Individually*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**JAY CHRISTOPHER HUMPHREYS, et al.**  
*Debtors*

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§  
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**CASE NO. 18-10375**

**CHAPTER 12**

**JUAN GARCIA, JR., et. al.**  
*Plaintiff*

§  
§  
§

**VS.**

**ADVERSARY NO. 19-1001**

**JAY CHRISTOPHER HUMPHREYS, et. al.**  
*Defendant*

§  
§  
§

**ABSTRACT OF JUDGMENT  
OF  
AGREED JUDGMENT NO. 1**

|                        |                                                                                                                                                                                                                                   |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date Judgment Entered: | December 19, 2019                                                                                                                                                                                                                 |
| Judgment in Favor of:  | Juan Garcia, Jr., Trustee of the MEU 2012 Trust for J. Garcia, Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia and Maria Elena Useda, Individually                                                            |
| Judgment Against:      | Jay Christopher Humphreys                                                                                                                                                                                                         |
| Amount of Judgment:    | \$730,966.65 for Juan Garcia, Jr. Trustee of the MEU 2012 Trust for J. Garcia<br><br>\$553,686.02 for Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia<br><br>\$520,649.00 for Maria Elena Useda, Individually |
| Amount of Costs:       |                                                                                                                                                                                                                                   |
| Rate of Interest:      | Post Judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered.                                                                                             |

|                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Amounts of Credits Since Judgment:</p> | <p><b><u>Payments through Chapter 12 Trustee:</u></b><br/> \$173,796.98 for Juan Garcia, Jr. Trustee of the MEU 2012 Trust for J. Garcia-Trustee's Claim No. 241;</p> <p>\$163,280.83 for Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia- Trustee's Claim No. 239</p> <p>\$153,538.29 for Maria Elena Useda, Individually-Trustee's Claim No. 240</p> <p><b><u>Direct Payments Paid to Juan Garcia for Trust for J. Garcia:</u></b><br/> \$240,000.00</p> |
| <p>Amount Due:</p>                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

The above and foregoing is a correct Abstract of Judgment entered in the United States Bankruptcy Court, for the Southern District of Texas, in the above-captioned case.

CLERK OF COURT

Date:

2/6/2023

BY:

Ana Castro

Deputy Clerk

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**JAY CHRISTOPHER HUMPHREYS, et al.**  
*Debtors*

§  
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**CASE NO. 18-10375**

**CHAPTER 12**

**JUAN GARCIA, JR., et. al.**  
*Plaintiff*

§  
§  
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§  
§

**VS.**

**ADVERSARY NO. 19-1001**

**JAY CHRISTOPHER HUMPHREYS, et. al.**  
*Defendant*

**ABSTRACT OF JUDGMENT  
OF  
AGREED JUDGMENT NO. 1**

|                        |                                                                                                                                                                                                                                   |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date Judgment Entered: | December 19, 2019                                                                                                                                                                                                                 |
| Judgment in Favor of:  | Juan Garcia, Jr., Trustee of the MEU 2012 Trust for J. Garcia, Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia and Maria Elena Useda, Individually                                                            |
| Judgment Against:      | Jay Christopher Humphreys                                                                                                                                                                                                         |
| Amount of Judgment:    | \$730,966.65 for Juan Garcia, Jr. Trustee of the MEU 2012 Trust for J. Garcia<br><br>\$553,686.02 for Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia<br><br>\$520,649.00 for Maria Elena Useda, Individually |
| Amount of Costs:       |                                                                                                                                                                                                                                   |
| Rate of Interest:      | Post Judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered.                                                                                             |

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Amounts of Credits Since Judgment: | <p><b><u>Payments through Chapter 12 Trustee:</u></b><br/> \$173,796.98 for Juan Garcia, Jr. Trustee of the MEU 2012 Trust for J. Garcia-Trustee's Claim No. 241;</p> <p>\$163,280.83 for Celina Garcia-Anderson, Trustee of the MEU 2012 Trust for C. Garcia- Trustee's Claim No. 239</p> <p>\$153,538.29 for Maria Elena Useda, Individually-Trustee's Claim No. 240</p> <p><b><u>Direct Payments Paid to Juan Garcia for Trust for J. Garcia:</u></b><br/> \$240,000.00</p> |
| Amount Due:                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

The above and foregoing is a correct Abstract of Judgment entered in the United States Bankruptcy Court, for the Southern District of Texas, in the above-captioned case.

CLERK OF COURT

Date: 2/6/2023

BY: Ana Castro  
Deputy Clerk



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**JAY CHRISTOPHER HUMPHREYS, et al.**  
*Debtors*

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**CASE NO. 18-10375**

**CHAPTER 12**

**JUAN GARCIA, JR., et. al.**  
*Plaintiff*

§  
§  
§

**VS.**

**ADVERSARY NO. 19-1001**

**JAY CHRISTOPHER HUMPHREYS, et. al.**  
*Defendant*

§  
§  
§

**ABSTRACT OF JUDGMENT  
OF  
AGREED JUDGMENT NO. 2**

|                                   |                                                                                                                                       |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Date of Judgment Entered:         | December 19, 2019                                                                                                                     |
| Judgment in Favor of:             | Juan Garcia, Jr., Individually                                                                                                        |
| Judgment Against:                 | Jay Christopher Humphreys                                                                                                             |
| Amount of Judgment:               | \$500,000.00                                                                                                                          |
| Amount of Costs:                  |                                                                                                                                       |
| Rate of Interest:                 | Post Judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered. |
| Amount of Credits Since Judgment: | None                                                                                                                                  |
| Amount Due:                       |                                                                                                                                       |

The above and foregoing is a correct Abstract of Judgment entered in the United States Bankruptcy Court for the Southern District of Texas, in the above captioned case.

CLERK OF COURT

Date:

2/6/2023

BY:

Ana Castro

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**JAY CHRISTOPHER HUMPHREYS, et al.**  
*Debtors*

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**CASE NO. 18-10375**

**CHAPTER 12**

**JUAN GARCIA, JR., et. al.**  
*Plaintiff*

§  
§  
§

**VS.**

**ADVERSARY NO. 19-1001**

**JAY CHRISTOPHER HUMPHREYS, et. al.**  
*Defendant*

§  
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§

**ABSTRACT OF JUDGMENT  
OF  
AGREED JUDGMENT NO. 2**

|                                   |                                                                                                                                       |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Date of Judgment Entered:         | December 19, 2019                                                                                                                     |
| Judgment in Favor of:             | Juan Garcia, Jr., Individually                                                                                                        |
| Judgment Against:                 | Jay Christopher Humphreys                                                                                                             |
| Amount of Judgment:               | \$500,000.00                                                                                                                          |
| Amount of Costs:                  |                                                                                                                                       |
| Rate of Interest:                 | Post Judgment interest on these amounts at the statutory rate of interest per year from and after the date this Judgment is rendered. |
| Amount of Credits Since Judgment: | None                                                                                                                                  |
| Amount Due:                       |                                                                                                                                       |

The above and foregoing is a correct Abstract of Judgment entered in the United States Bankruptcy Court for the Southern District of Texas, in the above captioned case.

CLERK OF COURT

Date:

2/6/2023

BY:

*Ana Castro*