

and injunctive relief. Defendant has undertaken efforts to further breach the contract between the Plaintiffs and Defendant as well as further tortuously interfere with Plaintiffs' business relationships, misappropriate Plaintiffs' trade secrets, and commit conversion. Plaintiffs would show the Court that the deponent, David Greene, has been engaged in discussions with Defendant concerning the launching of a business with Defendant that would compete with products sold and distributed by Plaintiffs.

2. Plaintiffs have good cause to, and is entitled to examine this witness because they reasonably believe that David Greene has information relating to Plaintiffs' claims against Defendant, in particular concerning acts undertaken by Defendant in his clear breach of contract with Plaintiffs, tortious interference with Plaintiffs' business relationships, misappropriation of Plaintiffs' trade secrets, and conversion of Plaintiffs property.

3. Plaintiffs have good cause to take the deposition of David Greene. Plaintiffs reasonably believe that the testimony from David Greene is discoverable and is likely to lead to admissible evidence.

4. Pursuant to Rule 201.1(a)(2) of the Texas Rules of Civil Procedure, a party may take a deposition in another state by letter rogatory, letter of request or other such device.

5. Upon request of a party, the Court must issue of a letter rogatory on just and appropriate terms pursuant to Rule 201.1(c).

WHEREFORE, Plaintiffs Sharing Services Global Corporation f/k/a Sharing Services, Inc., Elepreneur, LLC and Elevacity Global, LLC request the Court issue an Order to the Clerk of the Superior Court of California, County of Orange to issue a Letter Rogatory for the taking of oral deposition of David Greene, 161 Montara Drive, Aliso Viejo, California 92656 in the above-styled and numbered cause of action, and for such other and further relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

JONES, DAVIS & JACKSON, PC

By: /s/ Wendy D. Dawer

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

By e-mail dated October 7, 2019, I advised Howard Klatsky, counsel for Defendant, of Plaintiffs' intent to file a request for issuance of a letter rogatory to take the deposition of David Greene, a California resident. I requested Mr. Klatsky let me know if Defendant had any objection to the issuance of the letter rogatory. No objection to the filing of Plaintiff's Request for Issuance of the Letter Rogatory was received by counsel for Defendant in response.

/s/ Matthew K. Davis

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served via e-mail, to all counsel of record on this 18th day of October, 2019.

/s/ Wendy D. Dawer

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