

CAUSE NO. 19-7298-367

<b>ROBERT OBLON,</b>	§	<b>IN THE DISTRICT COURT</b>
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>367<sup>TH</sup> JUDICIAL DISTRICT</b>
	§	
<b>JORDAN BROCK,</b>	§	
	§	
<b>Defendant.</b>	§	<b>DENTON COUNTY, TEXAS</b>

**RESPONSE TO SUPPLEMENT TO NON-PARTIES' SPECIAL APPEARANCE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Robert Oblon, Plaintiff in the above styled and numbered cause, and files this brief Response to the Supplement to Non-Parties' Special Appearance, and would respectfully show this Court the following:

**I.**

1. The Amended Motion to Show Cause that is pending before the Court concerns a Temporary Restraining Order and an Amended Temporary Restraining Order that were signed by this Court on August 22, 2019. The (initial) Temporary Restraining Order was entered by this Court at 11:51 a.m., well **before** the "trustee of the stock voting trust" voted the stock at issue. It is undisputed that this (initial) Temporary Restraining Order was in existence at the time that the "trustee of the stock voting trust" voted the stock at issue.

2. The "trustee of the stock voting trust" is Kip Allison, one of the non-parties in this case. Mr. Allison is also the Chief Operating Office of Sharing Services Global Corporation and the Chief Executive Officer of two (2) of its wholly-owned subsidiaries.

3. The votes that were cast after the (initial) Temporary Restraining Order was entered (by Allison) were then counted and treated as votes that were cast properly on (or in advance of) August 29, 2019, while this Court's Amended Temporary Restraining Order was still in effect.

4. The Non-Parties argue that this Court cannot adjudicate whether they violated the Temporary Restraining Order because “no ruling that Brock violated the Temporary Restraining Order has come to pass.” However, the Non-Parties ignore the following language that appears in the Court’s initial and Amended Temporary Restraining Order:

“IT IS FURTHER ORDERED that for fourteen (14) days from the date of this Order **no individual or entity shall exercise or attempt to exercise the right to vote any interest and class of shares that Alchemist owns in Sharing Services Global Corporation at the August 29, 2019 Annual Meeting of Shareholders of Sharing Services Global Corporation.**” (emphasis added).

5. Additionally, Plaintiff Oblon was not required to formally serve the non-parties with this Court’s (initial or Amended) Temporary Restraining Order. Rule 683 of the Texas Rules of Civil Procedure references “actual notice of the order by personal service **or otherwise.**” (emphasis added). Written notice – and even oral notice – has been held to be sufficient to satisfy the requirement of actual notice. *Hsin-Chi-Su v. Vantage Drilling Co.*, 474 S.W.3d 284, 296 (Tex. App.—Houston [14th Dist.] 2015, pet. denied), *Ex parte Jackman*, 663 S.W.2d 520, 523 (Tex. App.—Dallas 1983, no writ).

Respectfully submitted,

**FEE, SMITH, SHARP & VITULLO, L.L.P**



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**ATTORNEY FOR PLAINTIFF  
ROBERT OBLON**

**CERTIFICATE OF SERVICE**

THIS WILL CERTIFY that a true and correct copy of the foregoing instrument has been mailed, telecopied or hand delivered to all attorneys of record in this cause of action on the 31<sup>st</sup> day of January, 2020.

**Via E-filing & Email**

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