

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION**

Plaintiffs,

v.

**PATRICK O. HOWARD;
HOWARD CAPITAL HOLDINGS,
LLC; AND OPTIMAL ECONOMICS
CAPITAL PARTNERS, LLC,**

Defendants,

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Civil Action No. 3:17CV-420-L

MOVANT’S MOTION FOR EXPEDITED DISCOVERY

TO THE HONORABLE COURT:

COMES NOW, Movant **DOVILE SOBLINSKAS** (sometimes referred to as the “Movant”), and files this, Motion for Expedited Discovery against Receiver **W. CRAIG STOKELY and related parties** (sometimes hereinafter collectively referred to as the “Receiver”), to respectfully request leave to conduct Expedited Discovery to prepare for the imminent hearing on the Motion to Show Cause, and would show this Honorable Court as follows:

SUMMARY AND SUBSTANCE OF THIS MOTION

Specifically, the Movant respectfully requests authority to notice oral depositions duces tecum of parties upon **three days’ notice** prior to the answer date in this lawsuit. The Movant further requests that documents requested as part of any deposition notice duces tecum be produced at least **one day prior** to the commencement of the deposition for purposes of efficiency. Finally, the Movant requests that Receiver, Stokley and other

parties be ordered to respond in an expedited fashion to Requests for Production, Interrogatories, and Admissions.

The Movant believes that evidence discovered at these depositions may precipitate the need to depose other witnesses prior to the hearing on the Motion to Show Cause. The Movant respectfully requests that this Honorable Court allow him to take whatever additional depositions may be necessary upon three (3) days' notice to such proposed deponent.

The Movant, respectfully requires expedited depositions, document production, interrogatory answers, and requests for admissions to develop the details of the alleged wrongful conduct so that evidence at a Motion to Show Cause hearing can be presented efficiently and effectively, and so that the relief can be targeted precisely. Unless deposition, interrogatory, document, and other forms of discovery are permitted on an expedited basis, the Movant may be unable to carry her burden of proof prevailing on the merits at the Motion to Show Cause hearing.

PRAYER FOR RELIEF

For the foregoing reasons, the Movant respectfully seeks an Order allowing the Movant to conduct oral depositions upon **three days notice** prior to the appearance date. Further, the Movant respectfully requests that documents requested in Expedited Requests For Production be responded to and produced **within four days** of actual receipt of the Expedited Request for Production, that the Expedited Interrogatories be answered with four days of actual receipt of the Expedited Interrogatories, and that the Expedited Requests for Admissions be answered within four days of actual receipt of the Expedited Requests for Admissions.

DATED: MAY 16, 2017

Respectfully Submitted,

/s/ James S. Bell

By: _____

James Bell
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CERTIFICATE OF CONFERENCE

Brady Wyatt is unopposed to this Motion. Further, I certify that I have made a reasonable attempt to confer with the Receiver. The undersigned has sent numerous emails which have gone unanswered regarding the merits of this Motion. Presumably, the Receiver is opposed to the relief sought in this Motion.

/s/ James S. Bell

James S. Bell

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument has been served in accordance with the Federal Rules of Civil Procedure on this 16th day of May 2017.

/s/ James S. Bell

James S. Bell