

Cause No. 141-307474-19

VICTOR MIGNOGNA

Plaintiff,

v.

FUNIMATION PRODUCTIONS LLC,
JAMIE MARCHI, MONICA RIAL, AND
RONALD TOYE,*Defendants.*§
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IN THE DISTRICT COURT

141ST JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Plaintiff, Victor Mignogna, and files his *Motion for Protective Order* ("Motion"), asking this Honorable Court to order Ty Beard not be compelled to attend the hearing at 10:30 am on September 21, 2019. In support thereof, Plaintiff would respectfully show the following:

1. Plaintiff asks the Honorable Court to for a protective order in regard to the *Subpoena* dated November 6, 2019 seeking to compel the attendance of Ty Beard, counsel of record for Plaintiff, at 10:30 am on November 21, 2019 on the grounds that the testimony sought is not relevant to any fact of consequence before the Court for determination at that time.

2. Plaintiff asks the Court to enter a protective order directing that Ty Beard need not comply with Defendants' *Subpoena* on the additional grounds that Plaintiff must be protected from the disclosure of privileged material and information.

3. Ty Beard is Plaintiff's attorney in this matter; Mr. Beard is not a fact witness to the issues before the court. Mr. Beard's communications with Plaintiff are protected by work product and

attorney-client privileges.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff asks the Court to grant his *Motion for Protective Order* directing Ty Beard not be compelled to attend the hearing on at 10:30 am on November 21, 2019, and further relief to which Plaintiff may be entitled.

Dated: November 8, 2019

Respectfully submitted

BEARD HARRIS BULLOCK HUGHES
and MARTINEZ HSU

By: 
Ryan Sellers
Texas Bar No. 24096803
rsellers@mhlegallgroup.com
An Lee Hsu
Texas Bar No. 24078699
ahsu@mhlegallgroup.com
Michael Martinez
Texas Bar No. 24078933
msmartinez@mhlegallgroup.com
MARTINEZ HSU
4001 Airport Freeway, Ste. 150
Bedford, TX 76021
T: (682) 224-7810
F: (682) 730-8998

Jim E. Bullock
State Bar No. 00795271

Ty Beard
State Bar No. 00796181
Carey-Elisa Christie
State Bar No. 24103218
BEARD HARRIS BULLOCK HUGHES
5 Cowboys Way, Suite 300
Frisco, Texas 75034
(903) 509-4900
(903) 509-4908
ty@beardandharris.com
carey@beardandharris.com
jim@beardandharris.com

ATTORNEYS FOR PLAINTIFF
VICTOR MIGNOGNA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all parties as required by Texas Rules of Civil Procedure.

A handwritten signature in black ink, appearing to read "Ryan Sellers", is written over a horizontal line.

Ryan Sellers