

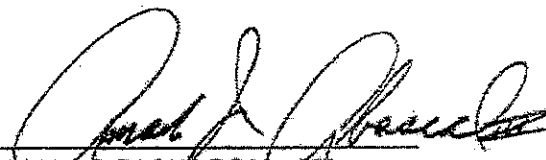
Cause No. 25-08-44811-MCVAJA

CITY OF EAGLE PASS, TEXAS)	IN THE DISTRICT COURT
VS.)	365TH JUDICIAL DISTRICT
JESSE A. MINTON, IN HIS INDIVIDUAL AND OFFICIAL CAPACITY AS PRESIDENT OF JUST 1 MANAGEMENT, LLC)	MAVERICK COUNTY, TEXAS

ORDER OF FORMAL VOLUNTARY RECUSAL

COMES NOW the Presiding Judge of the 365th Judicial District and pursuant to Article V, Section 11 of the Texas Constitution voluntarily recuses himself from the above styled and numbered cause pending in Maverick County, Texas, and for such issue this order.

SIGNED THIS 1st day of December, 2025.


AMADO J. ABASCAL, III
JUDGE PRESIDING
365TH JUDICIAL DISTRICT

FILED
AT 4:12 O'CLOCK P.M.
DEC 2 2025
LEOPOLD G. VILLALBA
District Clerk of the 365th Judicial District
Sarah Hernandez

25-08-44811-MCVAJA
CAUSE NO. _____

CITY OF EAGLE PASS, TEXAS	§	IN THE DISTRICT COURT
<i>Petitioner,</i>	§	
	§	365TH
	§	
v.	§	____ JUDICIAL DISTRICT
	§	
JESSE A. MINTON, <i>In his Individual and</i>	§	
<i>Official Capacity as President of Just 1</i>	§	
<i>Management, LLC</i>	§	
<i>Deponent.</i>	§	
	§	MAVERICK COUNTY, TEXAS

PETITIONER'S RULE 202 PETITION –
REQUESTING DEPOSITION BY WRITTEN QUESTIONS PRIOR TO SUIT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Petitioner, THE CITY OF EAGLE PASS, TEXAS, a home-rule municipality, and files this, a request the authority to take a deposition by written questions of JESSE A. MINTON, to include a subpoena of records, in order to obtain or perpetuate testimony for use in an anticipated suit as authorized by Texas Rule of Civil Procedure § 202. In that regard, the City will respectfully show the court as follows:

I.

1. Petitioner is the CITY OF EAGLE PASS, TEXAS (hereinafter, the "City" or "Petitioner"). The Petitioner anticipates the institution of any action to be filed in Maverick County, Texas in which Petitioner will be a plaintiff.

2. Deponent is JESSE A. MINTON (hereinafter, "Minton" or "Deponent"), and is the president/corporate representative of JUST 1 MANAGEMENT, LLC, JUST 1 MARKETING, LLC, and JUST 1 PRODUCTIONS, LLC. Deponent may be served via private process at his address of 2022 Oakshire Street, San Antonio, Texas 78232. Petitioner requests the clerk of the court to prepare citation for its private process server.

3. In anticipation of this suit, and pursuant to Tex. R. Civ. P. § 202.1(b), Petitioner desires to propound a deposition by written questions to Deponent, as the holder of records for JUST 1 MANAGEMENT, LLC, and desires to obtain records in the deposition by written questions via subpoena duces tecum. The testimony to be gained is also necessary to determine what claims, if any, can be brought against JESSE A. MINTON as owner of JUST 1 MANAGEMENT, LLC.

4. Pursuant to Tex. R. Civ. P. 202.1(b), Petitioner seeks this pre-suit discovery in order to determine if proper claims exist against the Deponent prior to filing suit.

II.

5. The subject matter of the anticipated litigation is a breach of contract claim. The Petitioner entered a contract with Deponent for Deponent to provide event management services for a City-sponsored event that took place in April 2024. Following the event, the City was not provided with any revenue from the ticket sales as the City was contracted to receive. To date, Petitioner roughly estimates that Deponent owes the City approximately \$100,000 in revenue from the City-sponsored event, which the City has not received. Deponent is therefore in breach of the contract.

6. Petitioner is unable to provide any monetary figures other than the aforementioned rough estimate as Deponent has failed to provide certain financial documentation to City, despite the City's repeated requests for same. The Petitioner requires documentation to not only better assess if suit against Deponent and his company(ies) are proper or fiscally responsible, but to also complete a city audit as required by Texas Local Gov't Code Chapter 103.¹ As stated, despite the City's requests for the documentation, Deponent has failed to respond.

7. Petitioner wishes to take the pre-suit deposition by written question of JESSE A. MINTON, which includes a subpoena duces tecum for documents that the City requires to complete its annual

¹ Please find attached as **Attachment A**, the affidavit of Felix Castillo, Finance Manager for the City of Eagle Pass, Texas.

financial audit under Tex. Loc. Gov't Code Chapter 103. Such documents will also be used to complete the City's analysis of whether it is feasible or fiscally responsible to bring suit based on the asserted breach of contract.

8. The City has a fiscal responsibility to manage public funds (taxpayer money) with prudence and efficiency in order to ensure that spending aligns with the City's needs and priorities while avoiding unnecessary debt or wasteful practices. The City therefore requires the documents requested in order to properly assess the claims and perform a cost/benefit analysis pursuant to the City's duty to its citizens.

9. The contract between Petitioner and Deponent included several provisions relating to production of documents by Deponent to City. The contract required that financial records, client lists, marketing plans, and other records be furnished to the City to ensure performance under the contract. Deponent further agreed to provide a payment log and receipts to the City for the monies paid to artists who performed at the City-sponsored event. These documents are not confidential to Deponent and should have been turned over to City without issue or delay. The City must now seek the records it is entitled to receive by using means available to it under the justice system. However, to the extent Deponent asserts that such documentation is confidential, Petitioner is agreeable to enter into a protective order for the documents.

10. The requested deposition by written questions may prevent a failure or delay of justice in an anticipated suit. The requested documentation, which would include expenditures of Deponent for the City-sponsored event and revenue data, will allow both parties to negotiate prior to suit being filed and will aid in any attempts to resolve the dispute without further court intervention.

11. The likely benefit of allowing the Petitioner to take the requested deposition by written questions to investigate a potential claim outweighs the burden or expense of the procedure.

Petitioner requests only specific types of documents to complete its audit and its analysis of a potential lawsuit. The documents being sought would allow Petitioner to identify what revenue is owed to it based on the contract between the parties. Once the Petitioner receives the documents, it can complete its legally required audit and the parties can negotiate a possible settlement prior to any suit being filed. If the documents are not received pursuant to this Petition, the City would likely have no other option but to proceed with litigation, which would place a burden and expense on the City that this § 202 Petition is aimed to avoid. The costs associated with litigation for a breach of contract claim, including identifying and serving multiple corporate identities associated with Deponent, would far exceed the cost of the more particularized requests included in this Petition, brought under Tex. R. Civ. P. § 202.

III.

12. The contact information for Deponent is as follows:

Jesse A. Minton
2022 Oakshire Street
San Antonio, Texas 78232
Tele: 210-718-7100
Email: jesse@just1management.com

IV.

13. For the reasons stated above and for good cause, the Petitioner requests that this court set this Petition for a hearing and, after hearing, issue an order authorizing Petitioner to take the deposition by written questions of JESSE A. MINTON, as the corporate representative and holder of company files of JUST 1 MANAGEMENT, LLC, JUST 1 MARKETING, LLC and JUST 1 PRODUCTIONS, LLC, to include a Subpoena Duces Tecum, at a time and place to be specified by the City in a deposition notice as required by the Texas Rules of Civil Procedure.

14. Petitioner further requests that the court issue an order for Deponent to produce for inspection and copying the documents and items specified in **Attachment B** hereto, which will

also be provided via Subpoena Duces Tecum with the deposition notice to be sent to Deponent as required by the Texas Rules of Civil Procedure.

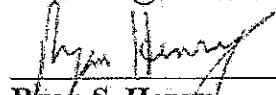
PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner, City of Eagle Pass, Texas, prays this court set a hearing on its Rule 202 Petition and, after hearing, order the deposition by written question of Deponent, Jesse A. Minton, along with ordering the production of documents listed in Attachment B hereto at the time of deposition. The Petitioner prays for such further relief, in law or in equity, to which it may show itself justly entitled.

SIGNED this 21st day of August, 2025.

Respectfully Submitted,

LAW OFFICES OF RYAN HENRY, PLLC
1019 Central Parkway N., Ste. 108
San Antonio, Texas 78232
Telephone: (210) 257-6357
Facsimile: (210) 569-6494
Ryan.Henry@RSHlawfirm.com
Jeff.Hohl@RSHlawfirm.com



Ryan S. Henry
State Bar No. 24007347
Jeff Hohl
State Bar No. 24071337

***ATTORNEYS FOR PETITIONER,
CITY OF EAGLE PASS, TEXAS***

