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NO. C-4241-17-J

DAVID ROJAS INDIVIDUALLY and D/B/A AUTOMATION STATION, LLC Plaintiff,	§	IN THE DISTRICT COURT
	§	
	§	
V.	§	430th JUDICIAL DISTRICT
	§	
ERIC RUBIO and PANASONIC CORPORATION OF NORTH AMERICA D/B/A PANASONIC AUTOMOTIVE SYSTEMS COMPANY OF AMERICA Defendants,	§	OF HIDALGO COUNTY, TEXAS

MOTION FOR ENTRY OF AGREED DOCKET CONTROL ORDER

This Motion for Entry of Agreed Docket Control Order is brought by Plaintiff, DAVID ROJAS INDIVIDUALLY and D/B/A AUTOMATION STATION, LLC. Plaintiff hereby requests that this Court enter the Agreed Docket Control Order for the following reasons:

1. On April 28th, 2023, a Docket Control Conference was held in the above-referenced and number cause. All parties were in attendance and Plaintiff's counsel was requested to submit the Agreed Docket Control Order for the court's approval.
2. Plaintiff's counsel circulated a proposed Agreed Docket Control Order to all parties on May 1, 2023 and a revised Agreed Docket Control Order on May 2, 2023. Defense counsel for Defendant, Panasonic Corporation of North America D/B/A Panasonic Automotive Systems Company of America, returned the signed order on May 4, 2023.
3. Plaintiff's counsel sent a follow up email to defense counsel Hernandez for Defendant, Eric Rubio, followed with the signature page that held defense counsel Cardenas' signature. No response was received by defense counsel Hernandez. A second follow up email was sent to defense counsel Hernandez on June 6, 2023, and again no response was received. Plaintiff's counsel attempted to call defense counsel Hernandez's office on two separate occasions and left messages, yet no response was received.
4. Plaintiff's counsel has made every effort necessary to contact defense counsel Hernandez for Defendant, Eric Rubio, to review and sign the Agreed Docket Control Order.
5. The Agreed Docket Control Order should therefore be signed.

6. Plaintiff, DAVID ROJAS INDIVIDUALLY and D/B/A AUTOMATION STATION, LLC hereby requests that this Court sign and enter the Agreed Docket Control Order attached to this motion as Proposed Order.

Respectfully submitted,

THE LAW OFFICE OF DAMIAN C. OROZCO, P.C.
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By: /s/ Damian C. Orozco
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on June 29, 2023:

Via E-Service:

Luis Cardenas, Attorney

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*Attorneys for Defendant, Panasonic Corporation of
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Attorney for Defendant, Eric Rubio

By: /s/ Damian C. Orozco
Damian C. Orozco
Attorney for Plaintiff

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Cristal Gonzalez on behalf of Damian Orozco
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Envelope ID: 77101698
Filing Code Description: Motion (No Fee)
Filing Description: Motion for Entry of DCO
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Associated Case Party: DAVID ROJAS INDIVIDUALLY AND D/B/A AUTOMATION STATION L.L.C.

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Law Office of Damian C.Orozco		orozcolawoffice@orozco-law.com	6/29/2023 2:54:51 PM	SENT

Associated Case Party: PANASONIC CORPORATION OF NORTH AMERICA D/B/A PANASONIC AUTOMOTIVE SYSTEMS COMPAN

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Associated Case Party: ERIC RUBIO

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