

CAUSE NO. 2024-48085

ATLANTIC WAVE HOLDINGS, LLC and SECURE COMMUNITY, LLC,	§	IN THE DISTRICT COURT OF
	§	
	§	
Plaintiff/Judgment-Creditor	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
CYBERLUX CORPORATION and MARK D. SCHMIDT, Individually,	§	
	§	
	§	
Defendant/Judgment Debtors.	§	129TH JUDICIAL DISTRICT

DEFENDANTS’ MOTION TO EXTEND STAY OF ENFORCEMENT

Defendants Cyberlux Corporation and Mark D. Schmidt (collectively, “Cyberlux” or “Defendants”) file this Motion to Extend this Court’s stay of collection efforts by Plaintiffs considering the ongoing litigation of the underlying Virginia judgment (the “Stipulated Judgment”), which is occurring in four separate legal actions pending in Virginia. In support thereof, Cyberlux respectfully shows:

INTRODUCTION AND RELEVANT BACKGROUND

On October 28, 2024, this Court properly granted a thirty-day stay of any collection efforts concerning the Stipulated Judgment by the Plaintiffs. This Court indicated that Cyberlux must demonstrate material activity in the Virginia action in order to extend the stay of this Texas action further. Because there is and has been material activity in the Virginia action, as further set forth herein, the Court’s stay of the Texas action should be further continued in deference to the Virginia action. Moreover, such a stay is supportable given that (a) the Virginia actions are active and (b) Cyberlux is making payments under the Settlement Agreement.

For the reasons set forth below, the Court should extend its stay for a period of an additional sixty days while the parties continue to litigate Defendants' challenges to the validity of the Settlement Agreement's Stipulated Judgment, as well as Defendants' request for reformation of the Stipulated Judgment.¹

ARGUMENT

Principles of comity require each jurisdiction to give effect to the laws and decisions of another, out of deference and respect, but that principle is undermined where, as here, there are prior-pending and relevant actions in different jurisdictions. *See Keene Corp. v. Caldwell*, 840 S.W.2d 715, 720 (Tex. App.—Houston [14th Dist.] 1992, no writ, orig. proceeding); *see also generally Khaledi v. H.K. Global Trading, Ltd.*, 126 S.W.3d 273, 285 (Tex. App.—San Antonio, 2003, no pet.) (temporary injunction ordered to preserve status of property pending decision of the rights of the parties under the promissory note and consulting agreement); *Hawsey v. Louisiana Dept. of Social Servs*, 934 S.W.2d 723, 726 (Tex. App.—Houston [1st Dist] 1996, writ denied) (“comity is grounded in cooperation and mutuality”).

A. Defendants are Actively Challenging the Validity of the Stipulated Judgment in Virginia and are asking Virginia Courts to Reform the Stipulated Judgment.

Cyberlux is challenging the validity of the Stipulated Judgment in Virginia, and Cyberlux seeks to reform or modify the Stipulated Judgment pursuant to the Settlement Agreement, as modified. *See* Exhibit 1, Declaration of J. Robinson, at ¶ 8. Cyberlux is challenging the Virginia judgment in *three* separate legal proceedings pending in Virginia.² *Id.*

¹ Defendants are also attempting to stop Plaintiffs' unlawful efforts to enforce the Stipulated Judgment in the original action from which the parties' Settlement Agreement arose.

² There is a fourth proceeding, CL24003910-00, which is a breach of contract action recently filed by the Plaintiffs in this action against Defendants. On November 4, 2024, Cyberlux filed a demurrer in that action. *See* Declaration of J. Robinson, at 8(d).

In Cause No. **CL22003882-00**, the original action from which the Settlement Agreement between the parties arose, Cyberlux is opposing Plaintiffs' illegal attempts to enforce the Stipulated Judgment. *See* Declaration of J. Robinson, at ¶ 8(a).

In Cause No. **CL24002919-00**, an action for injunctive relief brought by Cyberlux, Cyberlux seeks injunctive relief to (1) enjoin Atlantic Wave and Secure Community from their illegal attempts to use the Stipulated Judgment under false pretenses; or (2) to reform the Stipulated Judgment. *See* Declaration of J. Robinson, at ¶ 8(b).

In Cause No. **CL24002960-00**, Cyberlux's declaratory judgment action for Atlantic Wave and Secure Community's breach of the Settlement Agreement, Cyberlux is asking the Court to, among other things, declare the rights and obligations of the parties with respect to the Stipulated Judgment considering the parties' modification of the Settlement Agreement. *See* Declaration of J. Robinson, at ¶ 8(c).³

The Stipulated Judgment was not a judgment on the merits. It did not find, nor recite, any findings of legal liability. *See* Exhibit 7 to Defendants' Motion to Vacate and Motion to Stay. Instead, the Stipulated Judgment was attached as an exhibit to the parties' Settlement Agreement. *Id.* In other words, all parties to the Settlement Agreement knew that the Stipulated Judgment was intended as a vehicle for use if—and only if—Cyberlux breached the Settlement Agreement. *See id.*

The representations set forth in Plaintiffs' Motion for Reconsideration are incorrect. Cyberlux is challenging use of the Stipulated Judgment and, alternatively, seeking reformation of the Stipulated Judgment. *See* Declaration of J. Robinson, at ¶¶ 8, 9, 17.

³ The parties have demurrers pending. The Court has not yet set for hearing either Plaintiffs' demurrer nor Defendants' demurrer.

B. Contrary to Plaintiffs’ Representations to the Court, Cyberlux has Prosecuted and Continues to Prosecute its Challenges to the Stipulated Judgment.

At the October 28, 2024 hearing on Defendants’ Motion to Vacate and Motion to Stay, Plaintiffs’ counsel represented that Cyberlux was taking no action to prosecute the Virginia actions. That representation is not just misleading, but untrue.

For more than six weeks, the parties worked with the Court to try to schedule a 30-minute hearing on Atlantic Wave’s motion to compel in the injunction action. *See* Declaration of J. Robinson, at ¶ 12, Exhibit A. In fact, since September 12, 2024, the parties have been attempting to schedule a hearing in that action. *Id.* The parties, by agreement, then decided to try and obtain a one-hour hearing to address Atlantic Wave’s motion for summary judgment. *Id.* The parties and the Court could not find any mutually available date for a hearing in 2024. As a result, on October 30, 2024, the parties **agreed** to set a hearing on Atlantic Wave’s motion for summary judgment on March 27, 2025. *Id.* Indeed, Mr. Zablach himself stated “I can confirm that we have agreed to March 27, 2025 at 10am . . .” *Id.* “The Court **accepted this agreed setting.** *Id.*

Counsel for Atlantic Wave has since canceled the agreed setting. *See* Declaration of J. Robinson, at ¶ 13. Cyberlux immediately obtained—and offered—April 21, 2025, which was the Court’s next available date for hearing. *See id.* Only at that point did Atlantic Wave and Secure Community begin demanding that Cyberlux agree to hearing dates on which Atlantic Wave’s counsel knew counsel for Cyberlux was unavailable. *See* Declaration of J. Robinson, at ¶ 14. Counsel for Cyberlux is scheduled for trial on November 19, 2024, and is out of the country on December 27, 2024. *See* Declaration of J. Robinson, at ¶ 14.

Simply put, Plaintiffs’ claims regarding Cyberlux’s supposed dilatory tactics in Virginia are baseless. The parties are simultaneously litigating four contentious actions in Virginia, and Cyberlux is working to prosecute its challenge to the Stipulated Judgment. It is of no consequence

that the first hearing Cyberlux is working to schedule happens to be a hearing on a motion filed by Plaintiffs regarding Plaintiffs' claim for breach of the Settlement Agreement, *i.e.*, also a central issue between the parties that is core to the enforceability of the Stipulated Judgment. In other words, Plaintiffs cannot demand a hearing on their motion and then, while Cyberlux is working with Plaintiffs to move the case forward and schedule a hearing on the motion, simultaneously claim that Cyberlux is "doing nothing" to prosecute its challenges. Cyberlux's actions to schedule a hearing on and defeat Plaintiffs' summary judgment motion is, in and of itself, a form of prosecuting its challenge to the validity of the Stipulated Judgment (which includes its request for reformation). Unfortunately, busy court dockets have presented challenges that Plaintiffs have made more difficult by their shifting availability. *See* Declaration of J. Robinson, at ¶ 15. This should not cut against Cyberlux's multiple efforts in Virginia.

Cyberlux has challenged and continues to challenge the validity of the Stipulated Judgment, and Cyberlux seeks reformation of the Stipulated Judgment to the extent the Virginia court is unwilling to prohibit its enforcement. As described herein, Cyberlux is working with the parties and the Virginia Court to prosecute its affirmative actions and defend against Atlantic Wave's and Secure Community's meritless attempts following **Plaintiffs'** breach of the Settlement Agreement.

C. An Extension of the Stay is Appropriate to Protect the Parties and Maintain the Status Quo.

Texas courts have long held that wrongfully depriving a person of property causes irreparable harm. *See Houston Funeral Home v. Boe*, 78 S.W.2d 1091, 1094 (Tex. App.—Amarillo 1934, no writ) (where property is wrongfully taken "such owner would be deprived of his possession and suffer damages, for which he would have no adequate remedy at law"). Therefore,

Texas courts may stay execution of a judgment to prevent a person from being wrongfully deprived of property. *Id.* (“The equities of the situation rest with him whose possession is thus wrongfully disturbed, and, in order to hold the matter in status quo, a court of equity, in the exercise of its powers to prevent a wrong, will, by a temporary writ of injunction, stay an execution, so that the status of the parties will rest until their ultimate rights are determined . . .”).

Here, Cyberlux is at great risk of being wrongfully deprived of its property. Cyberlux has made hundreds of thousands of dollars worth of payments to Atlantic Wave and non-party Strikepoint, pursuant to the parties’ Settlement Agreement. *See* Cyberlux’s Motion to Vacate and Motion to Stay, at Ex. 1 (Grimes Dec.), ¶¶6-17; Ex. 2 (Schmidt Dec.), ¶4. Cyberlux made all payments required under the modified payment schedule, and those payments were accepted without condition. *See* Cyberlux’s Motion to Vacate and Motion to Stay, at Ex. 1(Grimes Dec.), ¶¶22-28, Exs. N-S; Ex. 2(Schmidt Dec.), ¶4, Ex. C. Considering the extensive, ongoing, and parallel litigation in Virginia, the Court should stay enforcement to avoid exposing the parties to substantial risk of inconsistent adjudication because the Stipulated Judgment may be deemed invalid or otherwise be reformed. If this Court allows enforcement to proceed against Cyberlux’s property in Texas and the Virginia court enters a decision that alters the Judgment in Cyberlux’s favor, Cyberlux’s property will have been wrongfully and unnecessarily taken. *Id.* (where property is wrongfully taken “such owner would be deprived of his possession and suffer damages, for which he would have no adequate remedy at law”). In other words, extending the stay avoids the substantial risk of additional litigation resulting from the Stipulated Judgment being deemed invalid or being reformed.

By extending the stay, the Court will maintain the *status quo*. *Boe*, 78 S.W.2d at 1094 (“The equities of the situation rest with him whose possession is thus wrongfully disturbed, and, in order

to hold the matter in status quo, a court of equity, in the exercise of its powers to prevent a wrong, will, by a temporary writ of injunction, stay an execution, so that the status of the parties will rest until their ultimate rights are determined through a full hearing on the merits.”). Since the parties’ Settlement Agreement makes clear there is to be no execution on the Judgment without a breach of the Settlement Agreement, it is most appropriate to stay this matter until Cyberlux’s challenge to the validity of the Stipulated Judgment and its request for reformation (made in the alternative) are resolved.

CONCLUSION

For all the reasons set forth above, Defendants ask this Court to grant this Motion and extend the Court’s stay of enforcement of the judgment for a period of sixty days. Defendants will provide a status report to the Court in forty-five days. Defendants also request all such other and further relief to which they may be entitled either at law or at equity.

Dated: November 15, 2024

Respectfully submitted,

By: /s/ Katharine Battaia Clark

Katharine Battaia Clark

State Bar No. 24046712

Alexander J. Pennetti

State Bar No. 24110208

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**COUNSEL FOR
CYBERLUX CORPORATION**

CERTIFICATE OF SERVICE

I certify that on November 15, 2024, I had this document served on all counsel of record via electronic service.

/s/ Katharine Battaia Clark
Katharine Battaia Clark

Unofficial Copy Office of Marilyn Burgess District Clerk

Unofficial Copy Office of Marilyn Burgess District Clerk

EXHIBIT 1

CAUSE NO. 2024-48085

ATLANTIC WAVE HOLDINGS, LLC
and SECURE COMMUNITY, LLC,

Plaintiff/Judgment-Creditor

v.

CYBERLUX CORPORATION and
MARK D. SCHMIDT, Individually,

Defendant/Judgment Debtors.

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§

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

129TH JUDICIAL DISTRICT

DECLARATION OF JIMMY F. ROBINSON

1. My name is Jimmy F. Robinson. I am over the age of twenty-one (21) years, of sound mind, and otherwise competent to make this declaration. The facts and statements contained in this declaration are within my personal knowledge and are true and correct.

2. I submit this Declaration in support of Defendants' Response to Plaintiffs' *Motion for Reconsideration* ("Motion").

3. I am the Office Managing Shareholder of the Richmond, Virginia office of Ogletree, Deakins, Nash, Smoak & Stewart, PC.

4. I am lead-counsel for Cyberlux Corporation and Mark D. Schmidt (collectively, "Cyberlux") in four active cases pending in the Circuit Court of the City of Richmond, Virginia (the "Virginia litigation").

5. On November 1, 2024, I was apprised of Plaintiffs' Motion for Reconsideration filed in this case. I have reviewed Plaintiffs' Motion for Reconsideration and the Declaration of Federico Zablah.

6. The purpose of this declaration is to provide the Court with the recent and upcoming activity in the Virginia litigation between the parties, as well as to correct some of the statements in Mr. Zablah's declaration.

Pending Virginia Litigation

7. On November 1, 2024, I was notified that Plaintiffs represented to this Court that Cyberlux was not challenging the Stipulated Judgment in Virginia. This is incorrect.

8. Cyberlux is challenging the validity of the Stipulated Judgment and Cyberlux seeks to reform or modify the Stipulated Judgment pursuant to the Settlement Agreement, as modified. Cyberlux is taking action in several pending Virginia proceedings to accomplish this, including:

- a. **CL22003882-00:** This is the original action from which a Settlement Agreement between Cyberlux on the one hand, and Atlantic Wave and Secure Community on the other, arose. The Settlement Agreement was executed on or about June 15, 2023. As part of that Settlement Agreement, the parties agreed to the entry of a Stipulated Judgment, in part to ensure finality surrounding claims involving third-party Strikepoint Consulting LLC. The payments set forth in the Settlement Agreement and referenced by the Stipulated Judgment were later modified by agreement of the parties. Cyberlux is opposing Plaintiffs' illegal attempts to enforce the Stipulated Judgment.
- b. **CL24002919-00:** On July 8, 2024, Cyberlux filed this injunction against Atlantic Wave and Secure Community. Atlantic Wave and Secure Community filed their answer on August 1, 2024. In Cause No. CL24002919-00, Cyberlux seeks injunctive relief to prohibit Atlantic Wave and Secure Community from further misrepresenting the terms of the Stipulated Judgment and the Settlement Agreement and to prohibit enforcement of the Stipulated Judgment. In short, Cyberlux is asking the Court to either (a) stop Atlantic Wave and Secure Community from their illegal attempts to use the Stipulated Judgment under false pretenses; or (b) to reform the Stipulated Judgment such that the value of the Stipulated Judgment is reformed to reflect the remaining amount due under the Settlement Agreement.
- c. **CL24002960-00:** On July 8, 2024, Cyberlux filed this action for declaratory judgment for breach of the Settlement Agreement by Atlantic Wave and Secure Community. Atlantic Wave and Secure Community filed a demurrer. In this action, Cyberlux is requesting that the Virginia court, among other things, declare the rights and obligations of the parties with respect to the use of the Stipulated Judgment pursuant to the terms of the Settlement Agreement, as modified.

- d. **CL24003910-00**: This action was filed by Plaintiffs against Cyberlux regarding Cyberlux's alleged breaches of the Settlement Agreement. On November 4, 2024, Cyberlux filed a demurrer.¹

9. Simply put, the representations set forth in Plaintiffs' Motion for Reconsideration are incorrect. Cyberlux is challenging use of the Stipulated Judgment and, alternatively, seeking reformation of the Stipulated Judgment pursuant to the terms of the modified Settlement Agreement in the Virginia actions as described above.

Upcoming Activity in the Virginia Litigation

10. Plaintiffs' representations concerning Cyberlux's alleged inactivity and dilatory tactics are baseless.

11. In his declaration, Mr. Zablah suggested to this Court that Cyberlux was improperly delaying a hearing until March 27, 2025. *See* Declaration of F. Zablah, at par. 13-14. That is not true.

12. Since September 12, 2024, the parties have been attempting to schedule a hearing in the injunction action on various matters. *See* Exhibit A to this Declaration. Initially, the parties were working to schedule a 30-minute hearing on Atlantic Wave's motion to compel. Then, after further discussion, the parties decided to instead schedule a 1-hour hearing to address Atlantic Wave's motion for summary judgment. *See* Exhibit A. The parties were unable to find a mutually agreeable date for a hearing in 2024. However, on October 30, 2024, the parties ***agreed*** to set a hearing on Atlantic Wave's motion for summary judgment on March 27, 2025. The Court ***accepted this agreed setting. Id.***

¹ In Virginia, a demurrer is a procedural vehicle used to challenge the legal sufficiency of a plaintiff's complaint.

13. However, counsel for Atlantic Wave later indicated he had a conflict and could no longer agree to the March 27, 2025 hearing date. *Id.* After counsel for Atlantic Wave and Secure Community reneged on their agreement to the March 27, 2025 hearing date, Cyberlux offered the court's next available date, which was on April 21, 2025. *Id.* Counsel for Atlantic Wave and Secure Community has not agreed to that date and now complains of this offer in his declaration.

14. Despite previously agreeing to a hearing date on March 27, 2025, Atlantic Wave and Secure Community now accuse Cyberlux of dilatory tactics because Cyberlux has not agreed to the Court's recently offered hearing date of November 19, 2024. I am scheduled to be in a labor arbitration on November 18 -19, 2024. *Id.* Although the Court also offered December 27, 2024, I am not available because of previously scheduled travel out of the country on that date.

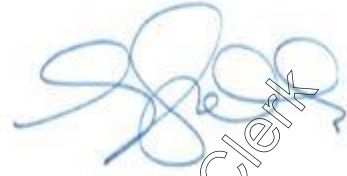
15. Since counsel for Atlantic Wave and Secure Community will not agree to the April 21, 2025 hearing date, which was the next available date provided by the Court following what was the *agreed* upon March 27, 2025 hearing date, the parties continue to evaluate their availability. In other words, despite more than *six weeks* of communications with the Court, the parties still have not been able to schedule a first hearing date in the injunction action.

16. In sum, there is no basis for the claim by Atlantic Wave and Secure Community concerning supposed inaction by Cyberlux. Cyberlux has been working with the parties and the Court to move the action forward.

17. Cyberlux has challenged and continues to challenge the validity of the Stipulated Judgment, and Cyberlux seeks reformation of the Stipulated Judgment to the extent the Virginia court is unwilling to prohibit its enforcement. As described herein, Cyberlux is working with the parties to prosecute its affirmative actions and defend against Atlantic Wave and Secure Community's meritless attempts following their breach of the Settlement Agreement.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed in Richmond, Virginia, State of Virginia, on the 7th day of November, 2024.



Jimmy F. Robinson, Declarant

Unofficial Copy Office of Marilyn Burgess District Clerk

Unofficial Copy Office of Marilyn Burgess District Clerk

EXHIBIT A

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Thursday, October 31, 2024 11:37 AM
To: Robinson, Jr., Jimmy F.
Cc: Chap Petersen; Sandra Luevano; Patrick R Corish; Gills, Sandy D.; Johnson, Alicia Roberts
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

[Caution: Email received from external source]

Mr. Robinson,

Thank you for your email. I cannot agree to set this matter for April or anytime later next year as this is a time sensitive matter as any relief for temporary injunctive relief is. It strains reason why one would file a complaint for preliminary injunction and want to wait almost 1 year before the first hearing takes place, unless the sole purpose of that filing was for delay. If your complaint and request for injunctive relief is warranted, there is no reason to wait to resolve this matter and it is in all our clients' best interest to get this resolved as soon as possible.

As a preliminary matter, you filed this injunction matter in July, have failed to set the injunction for hearing, failed to respond to discovery, failed to show for the deposition of your plaintiff client (or set it for a replacement date), refused to set the motion to compel for hearing or taken any steps to comply with the rules of the Court.

Additionally, as it concerns the injunction you have requested and summary judgment, I have clear indications that no payment on the settlement agreement has been received in almost a year to Atlantic Wave, besides the garnishments, which were almost all consumed by interest and attorney's fees.

Given this, I think it is in our mutual interest to have this matter set as soon as possibly. The Court has been very accommodating to give us November 19, 2025. I suggest we make this date work. You stated you are in trial on that date. Is that trial definitely going to proceed? Perhaps your co-counsel can cover the hearing on November 19?

While we are on the subject of clearing dates, we need discuss your recent objection to our garnishments (which **you did not send to us** despite indicating the certificate of service). I am aware that you are using this matter to delay collection on the judgment in this and other jurisdictions. Given that you have put forth objections based on this pending case, it makes it paramount that we resolve these objections and this matter to determine the propriety of your objections. Accordingly, we are again requesting the deposition of Mark Schmidt and Cyberlux in this matter. Please provide available dates for a deposition in November.

Lastly I would also like to set our Motion for Turnover for Hearing in CL22003882-00. Can you confirm if you or your colleague are available one hour in November? Once we have those I will be able to coordinate with Court in that case.

I am happy to have a call with you to go over this and meet and confer on these issues.

Best,

Federico J. Zablah, Esq.
Chap Petersen & Associates, PLC

Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Sent: Thursday, October 31, 2024 10:27 AM
To: Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Johnson, Alicia Roberts <alicia.johnson@ogletreedeakins.com>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Good morning Federico-

Cyberlux has the following dates/times available for a hearing on Atlantic Wave's Summary Judgment Motion before Judge Cardwell.

Apr 21 at 10:00
Apr 28 at 9:00

Best, JfR

Jimmy F. Robinson, Jr. | Ogletree Deakins

Riverfront Plaza - West Tower, 901 East Byrd Street, Suite 1300 | Richmond, VA 23219 | Telephone: 804-663-2336
jimmy.robinson@ogletree.com | www.ogletree.com | [Bio](#)

From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Thursday, October 31, 2024 9:34 AM
To: Robinson, Jr., Jimmy F. <Jimmy.Robinson@ogletreedeakins.com>
Cc: Federico Zablah <fjz@petersenfirm.com>; Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

[Caution: Email received from external source]

Apr 21 at 10:00
Apr 25 at 9:00
Apr 28 at 9:00
Apr 29 at 9:00 (30 minutes)
Apr 30 at 9:00 (30 minutes)

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Sent: Thursday, October 31, 2024 9:24 AM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Cc: Federico Zablah <fjz@petersenfirm.com>; Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedekins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: Re: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Good morning Ms. Ceruti-

Thank you for your patience with helping us find a date. Defendants are not available on November 19 inasmuch as we have a trial that day. Also it does not give us time to file our brief. If March 27 does not work now for Atlantic Wave we will have to find later dates. If you could provide us later dates (beyond March 27) we will discuss between each other and confirm a date so we do not clog up your email with the back and forward. And hopefully this time we will confirm a date that actually works for both parties before confirming with you that it does.

JfR

Please excuse all typos and grammatical errors inasmuch as this message was sent from my iPhone. Thank you.

Jimmy F. Robinson, Jr. Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

Riverfront Plaza - West Tower, [901 East Byrd Street, Suite 1300 | Richmond, VA 23219](https://www.ogletree.com) | Telephone: [804-663-2336](tel:804-663-2336) |

Fax: [804-225-8641](tel:804-225-8641)

jimmy.robinson@ogletree.com | www.ogletree.com | [Bio](#)

On Oct 31, 2024, at 8:43 AM, Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov> wrote:

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I'll squeeze it in on Nov 19 at 12:30 if everyone is available.

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Wednesday, October 30, 2024 4:49 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeadkins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request - CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Ms. Ceruti,

I apologize, I was informed that March 27, 2025 at 10am will not work for us as we have a trial scheduled on that date in another jurisdiction. Are there any other available dates in November for even for a 30 minute hearing? Once I have that, I will confer with opposing counsel on a new date and get back to you. Since this is a preliminary injunction matter, I believe this is a time sensitive matter. Thank you.

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Wednesday, October 30, 2024 3:48 PM
To: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeadkins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Thanks.

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
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Richmond, VA 23219
(804) 646-6511 (Office)
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From: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Sent: Wednesday, October 30, 2024 3:43 PM
To: Federico Zablah <fjz@petersenfirm.com>; Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeadkins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Agreed.

Jimmy F. Robinson, Jr. | Ogletree Deakins

Riverfront Plaza - West Tower, 901 East Byrd Street, Suite 1300 | Richmond, VA 23219 | Telephone: 804-663-2336
jimmy.robinson@ogletree.com | www.ogletree.com | [Bio](#)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Wednesday, October 30, 2024 3:32 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>; Robinson, Jr., Jimmy F. <Jimmy.Robinson@ogletreedeadkins.com>

Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>

Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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1 hour works for us. Thank you.

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>

Sent: Wednesday, October 30, 2024 3:31 PM

To: Federico Zablah <fjz@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>

Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>

Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

March 27 at 10:00 a.m. confirmed for summary judgment. I have set the matter for one hour. Please let me know if more time is needed.

Thank you.

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Wednesday, October 30, 2024 3:19 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedekins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Ms. Ceruti,

Thank you for your assistance with this matter. I can confirm that we have agreed to March 27, 2025 at 10am for a hearing on Atlantic Wave's Summary Judgment Motion before Judge Cardwell.

If that works, I will have notice of hearing filed with the Clerk's office and provide you a courtesy copy once filed.

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Wednesday, October 30, 2024 3:10 PM
To: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedekins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Please coordinate your dates with all parties and confirm date with me before sending a notice of hearing with the clerk's office.

Thanks.

Sandra Ceruti, Judicial Assistant

Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Sent: Wednesday, October 30, 2024 3:07 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>; Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Thank you Ms. Ceruti-

Cyberlux has March 27, 2025 at 10am available for a hearing on Atlantic Wave's Summary Judgment Motion before Judge Cardwell.

Best, JfR

Jimmy F. Robinson, Jr. | Ogletree Deakins

Riverfront Plaza - West Tower, 901 East Byrd Street, Suite 1300 | Richmond, VA 23219 | Telephone: 804-663-2336

jimmy.robinson@ogletree.com | www.ogletree.com | [Bio](#)

From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Wednesday, October 30, 2024 3:02 PM
To: Robinson, Jr., Jimmy F. <Jimmy.Robinson@ogletreedeakins.com>; Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Feb 28 at 9:00

Mar 27 at 10:00

Mar 28 at 9:00

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>
Sent: Wednesday, October 30, 2024 2:51 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>; Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Good afternoon Ms. Ceruti-

Thank you for the dates. Can you provide dates in February as well. We are holding the week of January 27th for another matter and have conflicts on earlier dates.

Thank you, JfR

Jimmy F. Robinson, Jr. | Ogletree Deakins

Riverfront Plaza - West Tower, 901 East Byrd Street, Suite 1300 | Richmond, VA 23219 | Telephone: 804-663-2336

jimmy.robinson@ogletree.com | www.ogletree.com | [Bio](#)

From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Wednesday, October 30, 2024 2:48 PM
To: Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <Jimmy.Robinson@ogletreedeakins.com>; Gills, Sandy D. <sandy.gills@ogletreedeakins.com>; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Good afternoon,

None of the dates below are available. Please see additional dates below:

Dec 27 at 10:30
Jan 17 at 10:30
Jan 29 at 12:00
Jan 31 at 9:00

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Wednesday, October 30, 2024 2:12 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Ms. Ceruti,

I apologize for the delay in getting back to you, we are having difficulties agreeing to a date. Are the below dates (or any additional dates in November and December) still available for a hearing?

We would be looking to set our motion for Summary Judgment recently filed in this matter for a hearing rather than the previously mentioned motion to compel.

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Tuesday, October 1, 2024 9:47 AM
To: Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Good morning,

Nov 19 at 11:30
Nov 20 at 9:30
Dec 16 at 9:00

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Monday, September 30, 2024 4:55 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Ms. Ceruti,

I apologize for the delay in getting back to you. Does Judge Cardwell have any available dates in November? Thank you.

Best,

Federico J. Zablah, Esq.

<image001.png>

Chap Petersen & Associates, PLC

Direct Dial: (571) 459-2520

Email: fjz@petersenfirm.com

Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>

Sent: Thursday, September 12, 2024 2:26 PM

To: Federico Zablah <fjz@petersenfirm.com>

Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>

Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Judge Cardwell has nothing available on the 30th and the next two weeks are criminal dates. She then has a 7-day jury trial and the next available date is Oct 31 at 2:00 p.m.

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>

Sent: Thursday, September 12, 2024 2:07 PM

To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>

Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>

Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Thank you. If possible, could you also provide available dates in the following week? (Week of September 30th)

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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From: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Sent: Thursday, September 12, 2024 1:48 PM
To: Federico Zablah <fjz@petersenfirm.com>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: RE: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

Good afternoon,

Available dates for motion to compel:

Sep 23 at 2:00
Sep 24 at 9:30
Sep 25 at 12:00

Please coordinate dates with opposing counsel and confirm date with me before filing a notice of hearing with the clerk's office.

Thank you.

Sandra Ceruti, Judicial Assistant
Office of the Honorable Claire G. Cardwell
John Marshall Courts Building
400 North 9th Street
Richmond, VA 23219
(804) 646-6511 (Office)
(804) 646-7818 (Fax)

From: Federico Zablah <fjz@petersenfirm.com>
Sent: Thursday, September 12, 2024 12:45 PM
To: Ceruti, Sandra A. - Circuit Court Judges Office <Sandra.Ceruti@rva.gov>
Cc: Chap Petersen <jcp@petersenfirm.com>; Sandra Luevano <sl@petersenfirm.com>; Patrick R Corish <prc@petersenfirm.com>; Robinson, Jr., Jimmy F. <jimmy.robinson@ogletree.com>; SANDY.GILLS@OGLETREE.COM; Pollock, Emily - Circuit Court <Emily.Pollock@rva.gov>
Subject: Short Hearing Scheduling Request -CYBERLUX CORPORATION v ATLANTIC WAVE HOLDINGS LLC (CL24002919-00)

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Good Afternoon Ms. Ceruti,

We recently filed a Motion to Compel Deposition in the above matter and I understand from the Clerk's office that this matter was assigned to Judge Cardwell. Per the suggested practices of Richmond City, I am contacting you to set the motion for a thirty-minute hearing before Judge Cardwell on our Motion to Compel Deposition. I am attaching a copy of the motion. If possible, could you please provide us with available hearing dates in the next couple of weeks to set this matter for a hearing. Thank you in advance for your attention to this matter.

Best,

Federico J. Zablah, Esq.
<image001.png>
Chap Petersen & Associates, PLC
Direct Dial: (571) 459-2520
Email: fjz@petersenfirm.com
Fax: (571) 459-2307

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Frankie Huff on behalf of Katherine Clark
Bar No. 24046712
fhuff@thompsoncoburn.com
Envelope ID: 94054206
Filing Code Description: Answer/ Response / Waiver
Filing Description: Cyberlux Atlantic Wave Defs Response to Motion for Reconsideration re Stay
Status as of 11/7/2024 4:01 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Sandra Meiners		smeiners@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Laurie DeBardeleben		ldebardeleben@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Shawn Grady		shawn@gradycollectionlaw.com	11/7/2024 2:40:17 PM	SENT
Shawn Grady		shawn@gradycollectionlaw.com	11/7/2024 2:40:17 PM	SENT
Bernadette Martin		bernadette@gradycollectionlaw.com	11/7/2024 2:40:17 PM	SENT
Bernadette Martin		bernadette@gradycollectionlaw.com	11/7/2024 2:40:17 PM	SENT
Katharine Clark		kclark@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Lena Brasher		lbrasher@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Frankie Huff		fhuff@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Hannah Fischer		hfischer@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT
Alex Pennetti		apennetti@thompsoncoburn.com	11/7/2024 2:40:17 PM	SENT

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Frankie Huff on behalf of Katherine Clark
Bar No. 24046712
fhuff@thompsoncoburn.com
Envelope ID: 94347679
Filing Code Description: Motion (No Fee)
Filing Description: Cyberlux Atlantic Wave Motion to Extend Stay of Enforcement
Status as of 11/15/2024 3:49 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Sandra Meiners		smeiners@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Laurie DeBardeleben		ldebardeleben@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Shawn Grady		shawn@gradycollectionlaw.com	11/15/2024 12:50:29 PM	SENT
Shawn Grady		shawn@gradycollectionlaw.com	11/15/2024 12:50:29 PM	SENT
Bernadette Martin		bernadette@gradycollectionlaw.com	11/15/2024 12:50:29 PM	SENT
Bernadette Martin		bernadette@gradycollectionlaw.com	11/15/2024 12:50:29 PM	SENT
Katharine Clark		kclark@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Lena Brasher		lbrasher@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Frankie Huff		fhuff@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Hannah Fischer		hfischer@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT
Alex Pennetti		apennetti@thompsoncoburn.com	11/15/2024 12:50:29 PM	SENT