

CAUSE NO. 2017PC1546

ESTATE OF RONALD K. RUIZ, DECEDENT § IN THE PROBATE COURT
JOYCE E. RUIZ, Estate Administratrix
JOYCE RUIZ (INDIVIDUALLY) §
Plaintiff, §
VS. §
NO. 2
RAYMOND HARMON, §
INDIVIDUALLY, RAYMOND HARMON §
d/b/a HARMON'S, AND RAYMOND §
HARMON d/b/a HARMON'S BBQ §
Defendants, §
ROBERT CATALANO, §
Intervenor

BEXAR COUNTY, TEXAS

MOTION FOR RECONSIDERATION ON DEFENDANTS' MOVANTS JOINT
MOTION SUMMARY JUDGEMENT

Isaiah 61:8 "For I The LORD love justice , I hate robbery and wrong
doing with violence..."

Hello,

I JOYCE RUIZ (Plaintiff) a, Joyce Ruiz INDIVIDUALLY whom is also the INDEPENDENT ADMINISTRATRIX OF THE ESTATE OF RONALD K. RUIZ write to you today in regards to your ruling of the defendants HARMON/CATALANO JMSJ for hearing held August 30th, 2022. With respect to the court ,I disagree with this ruling on this order and am asking that JUDGE VERONICA VASQUEZ/court reconsider the ruling for the defendants and show us favor because of several things such as discovery and filed motions and subpoenas have yet to be addressed. There are many disputes in material facts such as the checks I shared with you . The defendants claim they were a favor the law says I am due and my husband Ronnie had agreements on how to handle a situation like this. Also Harmon and I had met in October and I was voluntarily receiving deposits into my bank account for over a year . This was NOT a Buy out..Also law and he IRS says I am to be treated like a partner under IRC Codes 736. Due to the fact that death of a partner does not always end the partnership when the successor in interest (ME)participates in the profits and loss and every CPA I have spoke with agrees this is how it works. Another disput however it is

proven by my documents filed with the court that the claim that the intervenor Robert Catalano is a partner is untrue. To this day he is not on any government business filings and has not produced a K1 or DBA, with his name. This is false information and those whom lie shall be held accountable. God is not pleased with this and He wants you to repent today.

Moreover The law and Texas Civil Practice And Remedies Code Sec. 16.004 (3,4,5) says I have four years to bring about a claim. The defendants claim of Tex Civ. Prac. & Remedies Code 16.004(3) in their motion states I have four years to claim or take action to collect on a debt. I ask you this If I am already collecting money and parts of the profits in the same month my husband passed which was October what sense does it make to file a claim at that point. This is a LIE in what they claim. These guys have twisted the truths to try to make them look like lies and try to turn lies into truth. This is gaslighting and it's WRONG! The reality is that in 2013 of October my dear husband Ronnie passed leaving us to grieve, and as defendants showed you their chart of payments to me and I shared my checks we should not be in this capacity of granting them the opportunity to have our case discontinued. I asked you to reconsider. The CAUSE OF ACTION does not accrue until the breach/fraud/discovery. This happened in 2015 I filed in 2018 which means I am withing the law. I hired legal professionals to file the claim and the court accepted this claim in May 2018. Pluse we have the DISCOVER RULE. In 2013 it was not broke in 2014 we were still working together so to say Harmon and I as agreed yet in 2015 Harmon unilaterally broke the agreement and this put the cause of action into motion. Think of it this way if you do not have a tummy ache or knee pain why go call a doctor and say you do. There is no cause or treatment for something that does not exist. It seems very odd that the defendants have taken basically five years to now say that I did not file in time. This is untrue, I filed well within the statues and furthermore I implore you to change your mind not just because of the request Judge Vasquez but because it is the law. Look at the evidence, Catalano has no right to file this claim he is not a partner. I not gotten my requested hearing on this Motion and my other motions and subpoenas. I am sure the community of San Antonio appreciates seeing cases like this that show truth and Justice. The bible tells us in Amos 5:24 But let justice roll on like a river, righteousness like a never-failing stream!

Thank you for your time and review. We pray for Justice In Jesus Name Amen!

Respectfully

Joyce Ruiz

PRO SE

Served ALSO to DEFENDANTS Attorneys

LOUIS WENZEL

JACOB FISCHER

Automated Certificate of eService

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Status as of 9/26/2022 10:12 AM CST

Associated Case Party: JOYCERUIZ

Name	BarNumber	Email	TimestampSubmitted	Status
Joyce Ruiz		2uneek@gmail.com	9/26/2022 9:19:31 AM	SENT

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Associated Case Party: Raymond Harmon

Name	BarNumber	Email	TimestampSubmitted	Status
Louis Wenzel		law@swlawsa.com	9/26/2022 9:19:31 AM	SENT

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jacob Fisher		jacobfisher@themathislawfirm.com	9/26/2022 9:19:31 AM	SENT