

NO. D-1-GN-25-002446

JERRY B. REED <i>Plaintiff</i>	§	IN THE DISTRICT COURT OF
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ROOK TX, LP et al. <i>Defendants</i>	§	353rd JUDICIAL DISTRICT
	§	

**PLAINTIFF’S MOTION TO COMPEL DISCOVERY RESPONSES BY
LOTTERY NOW, INC. AND QAWI AND QUDDUS, INC.**

TO THE HONORABLE COURT:

Plaintiff **Jerry B. Reed** files this Motion to Compel Discovery Responses by **Defendants Lottery Now, Inc. and Qawi & Quddus, Inc.** (“Defendants”). Both defendants have refused to answer a single interrogatory or to produce a single document. In support of his motion, Mr. Reed states:

I. INTRODUCTION AND STATUS OF THE CASE

This case arises from the April 22, 2023 Lotto Texas drawing, which state leaders and public officials have described as the largest lottery fraud in Texas history. A coordinated group of professional gamblers, data-modeling strategists, and retail ticket sellers engaged in a high-volume bulk ticket-printing operation designed to generate nearly every number combination and thereby guarantee capture of the jackpot. This was achieved using counterfeit QR-code software, external electronic interfaces, and high-speed non-standard printing devices

connected to lottery terminals, all of which rendered the resulting tickets invalid as a matter of law.

When Plaintiff Jerry Reed won the next Lotto Texas drawing on May 17, 2023, his jackpot was artificially suppressed by more than \$52 million as a direct result of the engineered April 22 jackpot.

Lottery Now, Inc. and Qawi & Quddus, Inc. are not peripheral to these events. They controlled the retail locations and lottery terminal access points where the high-volume bulk ticket printing occurred. Their activities are central to liability and damages.

Yet both Defendants have refused to produce a single document or answer a single interrogatory.

II. PROCEDURAL POSTURE

This case was originally filed in Travis County District Court, was removed to Business Court, and was then remanded back to Travis County District Court on August 25, 2025.

Defendants argue that discovery is premature because Rule 91a motions that were argued in the Texas Business Court have not yet been ruled upon. However, after the case was remanded to this Court, Defendants:

- Did not request a hearing on their Rule 91a motions,

- Did not request submission,
- Did not seek a ruling,
- Did not notify this Court that any motion remained pending.

Their co-defendant then requested the Fifteenth Court of Appeals to stay the case. The appellate court **denied** that request. There is **no stay of any kind and there is no pending 91a hearing** before this Court.

III. DISCOVERY SERVED AND WITHHELD

Plaintiff served:

1. Plaintiff's First Interrogatories, and
2. Plaintiff's First Requests for Production.

Defendants responded by refusing all discovery based on the pending Rule 91a motions that they have **not** set for hearing here and based on the pending petition for writ of mandamus filed by their co-defendant in the 15th Court of Appeals. See Exhibits A thru D (Defendants' Objections to Discovery).

IV. NO DISCOVERY STAY EXISTS

There is no discovery stay. The Business Court did not order a stay prior to remand. This Court has not ordered a stay. The Court of Appeals expressly denied a stay.

Rule 91a does not stay discovery. Defendants' reliance on *Bethel v. Quilling, Selander, Lownds, Winslett & Moser, P.C.*, 595 S.W.3d 651 (Tex. 2020), is misplaced. *Bethel* does **not** authorize staying discovery. Nothing in the opinion suggests Rule 91a operates as a discovery freeze.

The *Bethel* case states that Rule 91a lets courts dismiss meritless cases before expensive discovery, but this assumes the motion is promptly presented to the court as required by Rule 91a. Rule 91a.3(c) mandates that the motion be set for hearing and that the Court "must rule within 45 days." The Texas Supreme Court in *Bethel* was therefore describing a process in which the Rule 91a motion is timely filed and adjudicated. *Bethel* does not authorize a party to file a Rule 91a motion, refuse to set it for hearing, and then use the mere existence of the unrepresented motion as a self-help stay of discovery. That is the opposite of the procedural framework *Bethel* assumed.

Defendants are seeking a self-help stay. That's a tactic Texas law does not permit. A party cannot refuse to set its own Rule 91a motion for hearing and simultaneously invoke the pendency of that motion to block discovery.

V. THE PENDING MANDAMUS PROCEEDING DOES NOT STAY DISCOVERY

Defendants also argue that discovery should be suspended because a mandamus petition filed by their co-defendant remains pending in the Fifteenth

Court of Appeals. But the relator in that proceeding specifically requested a stay, and the appellate court **denied** that request. *See In re ColossusBets Ltd.*, Case No. 15-25-00150-CV, Order Denying Motion to Stay (15th Court of Appeals Sept. 30, 2025). (Exhibit E).

When an appellate court denies a stay, the trial court must continue to exercise its full jurisdiction. The mere pendency of a mandamus petition does **not** suspend proceedings, and there is **no rule** permitting a party to effect a stay by implication. Allowing a party to stop discovery simply by filing a mandamus petition would invert appellate procedure: the stay would follow automatically, rather than only when the appellate court finds it warranted. Texas law does not allow a litigant to obtain, through self-help, the very stay the Court of Appeals declined to grant.

VI. RELIEF REQUESTED

Plaintiff respectfully requests that the Court order:

1. **Lottery Now, Inc. and Qawi & Quddus, Inc.** to serve full and complete responses to Plaintiff's First Interrogatories and First Requests for Production **within ten (10) days** of the Court's Order.

Respectfully submitted,
LAGARDE LAW FIRM, P.C.

/s/ Richard L. LaGarde
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PLLC

/s/ Jeff Adams
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CO-COUNSEL FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that undersigned counsel conferred with counsel for Defendants regarding the discovery issues raised in this amended motion. The parties were unable to resolve their disputes. Accordingly, this motion is necessary.

/s/ Richard L. LaGarde

Richard L. LaGarde

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing instrument on opposing counsel on November 9, 2025, as follows:

By electronic service.

/s/ Richard L. LaGarde

Richard L. LaGarde

EXHIBIT A

JERRY B. REED
Plaintiff,

v.

ROOK TX, LP et al.
Defendants.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

353RD JUDICIAL DISTRICT

**DEFENDANT, QAWI AND QUDDUS, INC.'S,
OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

TO: Jerry B. Reed, by and through his attorneys of record, Richard and Mary LaGarde, 230 Westcott St., Suite 100, Houston, Texas 77007; Manfred Sternberg, 1700 Post Oak Blvd., 2 BLVD Place, Suite 610, Houston, Texas 77056; Jeff Adams, 119 Logansport Street, Center, Texas 75935.

COMES NOW, Defendant, Qawi and Quddus, Inc., and serves its objections to Plaintiff's first set of interrogatories.

Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

Respectfully submitted,



JON MICHAEL SMITH
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jon@jonmichaelsmith.com

CERTIFICATE OF SERVICE

I, Jon Michael Smith, do hereby certify that a true and correct copy of the foregoing document was delivered to all counsel of record via the electronic filing system on September 5, 2025.



JON MICHAEL SMITH

OBJECTIONS TO INTERROGATORIES

1. State the nature and extent of Qawi and Quddus, Inc.'s role, if any, in organizing, funding, or facilitating the Bulk Purchase of Texas lottery tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

2. Identify all individuals and legal entities who retained, hired, or encouraged Qawi and Quddus, Inc., to print a larger-than-usual number of tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because it is vague and overly broad.

3. Identify all individuals and legal entities who provided iPads or other electronic devices for use in printing tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

4. Identify all individuals and legal entities who provided QR codes for use in printing tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

5. Identify all individuals and legal entities who provided high-speed printers for use in printing tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

6. Identify all individuals who printed tickets at the Qawi and Quddus, Inc. facility for the April 22, 2023, Lotto Texas drawing, including each such person's employer at the time.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

7. Identify all individuals and legal entities who provided guidance or advice to Qawi and Quddus, Inc., regarding the Bulk Purchase.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory to the extent that it seeks information protected from discovery by the attorney-client privilege.

8. Describe the terms of any understandings, agreements, or contracts between Qawi and Quddus, Inc. and any other individual or legal entity regarding the printing of tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

9. Identify all individuals and legal entities who paid for the expenses incurred by Qawi and Quddus, Inc. in printing tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because it is vague.

10. Describe any wire transfers or other payments made to Qawi and Quddus, Inc. related to the Bulk Purchase of tickets for the April 22, 2023, Lotto Texas drawing, including the sender, recipient, date, and amount of each transaction.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

11. Describe whether Qawi and Quddus, Inc. received, directly or indirectly, any portion of the \$60,264,030 in Texas Lottery winnings paid out to Rook TX LP and/or Rook GP, LLC in connection with the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

12. Identify and describe all communications between Qawi and Quddus, Inc., and any of the following, from January 1, 2023, to July 1, 2023, relating to Lotto Texas drawings or the Bulk Purchase of Lotto Texas lottery tickets:

- a. ColossusBets Ltd.
- b. AutoLotto, Inc.
- c. Lottery.com, Inc.
- d. Lottery Now, Inc.
- e. AltX Management, LLC
- f. Lawrence Anthony DiMatteo III
- g. Ryan Dickinson
- h. Gary Grief or the Texas Lottery Commission
- i. IGT Global Solution Corporation
- j. Glenn Gelband
- k. Maxime Herve
- l. Zeljko Ranogajec a/k/a John Wilson
- m. Bernard Marantelli
- n. White Swan Data Ltd.
- o. Gregg Potts
- p. Thomas Ashcroft
- q. Stanley Dickson
- r. The Trowbridge Law Firm
- s. William Dickson

- t. The Texas Ranger
- u. Ade Repcenko
- v. Spinola Gaming
- w. Any other individual or entity involved in the bulk purchase of Lotto Texas tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because, by way of its subparts, it causes the total number of interrogatories to exceed the maximum amount allowed under the Texas Rules of Civil Procedure.

13. Describe any payments or reimbursements made by or to Qawi and Quddus, Inc. relating to the Bulk Purchase.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because the total number of interrogatories exceeds the maximum amount allowed under the Texas Rules of Civil Procedure.

14. Describe any internal communications by Qawi and Quddus, Inc. personnel regarding the Bulk Purchase.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because the total number of interrogatories exceeds the maximum amount allowed under the Texas Rules of Civil Procedure. Defendant also objects to this request because it is overly broad and unduly burdensome.

15. Describe the steps taken by Qawi and Quddus, Inc. to locate, collect, and preserve documents and data related to the Bulk Purchase.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this

interrogatory because the total number of interrogatories exceeds the maximum amount allowed under the Texas Rules of Civil Procedure. Defendant also objects to this interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence.

16. Describe the efforts made by Qawi and Quddus, Inc. to locate and produce documents responsive to Plaintiff's subpoena duces tecum, including all systems searched, search terms used, custodian interviews, and individuals involved in the process.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to these interrogatories or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court. Defendant also objects to this interrogatory because the total number of interrogatories exceeds the maximum amount allowed under the Texas Rules of Civil Procedure. Defendant also objects to this interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence.

EXHIBIT B

CAUSE NO. D-1-GN-25-002446

JERRY B. REED
Plaintiff,

v.

ROOK TX, LP et al.
Defendants.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

353RD JUDICIAL DISTRICT

**DEFENDANT, QAWI AND QUDDUS, INC.'S,
OBJECTIONS TO PLAINTIFF'S REQUEST FOR PRODUCTION**

TO: Jerry B. Reed, by and through his attorneys of record, Richard and Mary LaGarde, 230 Westcott St., Suite 100, Houston, Texas 77007; Manfred Sternberg, 1700 Post Oak Blvd., 2 BLVD Place, Suite 610, Houston, Texas 77056; Jeff Adams, 119 Logansport Street, Center, Texas 75935.

COMES NOW, Defendant, Qawi and Quddus, Inc., and serves its objections to Plaintiff's first request for production.

Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

Respectfully submitted,



JON MICHAEL SMITH
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CERTIFICATE OF SERVICE

I, Jon Michael Smith, do hereby certify that a true and correct copy of the foregoing document was delivered to all counsel of record via the electronic filing system on September 5, 2025.



JON MICHAEL SMITH

OBJECTIONS TO REQUEST FOR PRODUCTION

1. All communications, agreements, or contracts between Qawi and Quddus, Inc. and any other person or entity relating to the printing or sale of Lotto Texas tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

2. All documents identifying any individuals, legal entities, or business associations who were involved in or funded, directly or indirectly, the Bulk Purchase or printing of Lotto Texas tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

3. All documents reflecting the use or provision of devices, including iPads, QR codes, high-speed printers, or other electronic tools used in printing Lotto Texas tickets at Qawi and Quddus, Inc. locations for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

4. All transaction records, receipts, or internal logs showing the volume, timing, and sequence of tickets printed at any Qawi and Quddus, Inc. location for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

5. All wire transfers, bank records, or other payment documentation reflecting financial transactions between Qawi and Quddus, Inc., and any third party relating to the Bulk Purchase or printing of Lotto Texas tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

6. All documents reflecting payments made to or received by Qawi and Quddus, Inc. in connection with the \$60,264,030 lottery winnings ultimately paid to Rook TX LP and/or Rook GP, LLC for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

7. All communications between Qawi and Quddus, Inc. and any of the following, from January 1 to July 1, 2023, concerning Lotto Texas or lottery ticket purchases in Texas:
 - a. ColossusBets Ltd.
 - b. AutoLotto, Inc.
 - c. Lottery.com, Inc.
 - d. Lottery Now, Inc.
 - e. AltX Management, LLC
 - f. Lawrence Anthony DiMatteo III
 - g. Ryan Dickinson
 - h. Gary Grief or the Texas Lottery Commission
 - i. IGT Global Solutions Corporation
 - j. Glenn Gelband
 - k. Maxime Herve
 - l. Zeljko Ranogajec a/k/a John Wilson
 - m. Bernard Marantelli
 - n. White Swan Data Ltd.
 - o. Gregg Potts
 - p. Thomas Ashcroft
 - q. Stanley Dickson
 - r. William Dickson
 - s. The Trowbridge Law Firm
 - t. The Texas Rangers
 - u. Ade Repcenko
 - v. Spinola Gaming
 - w. Any other individual or entity involved in the bulk purchase of Lotto Texas tickets for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

8. All internal emails, memos, text messages, or chat messages among Qawi and Quddus, Inc.

employees or agents discussing the printing of tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

9. All documents reflecting payments or reimbursements made by or to Qawi and Quddus, Inc. relating to the April 22, 2023, Lotto Texas ticket purchases.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

10. All documents regarding efforts undertaken by Qawi and Quddus, Inc. to collect, locate, and preserve responsive records, including custodian lists, search terms used, systems accessed, and personnel involved in the process.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

11. All photographs and videos depicting the printing of any Lotto Texas tickets by Qawi and Quddus, Inc. for the April 22, 2023, drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

12. All photographs and videos depicting the persons who printed them, or the ticket or tickets printed by Qawi and Quddus, Inc., for the April 22, 2023, Lotto Texas drawing.

RESPONSE: Defendant, Qawi and Quddus, Inc., objects to responding to this request or to making any substantive objections at this time, as discovery is premature given the outstanding motions to be dismissed that are pending before the Court.

EXHIBIT C

JERRY B. REED

Plaintiffs,

v.

ROOK TX, LP, et al.,

Defendants.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

353RD JUDICIAL DISTRICT

**DEFENDANT LOTTERY NOW, INC.’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S FIRST SET OF INTERROGATORIES**

TO: Jerry B. Reed, by and through his attorneys of record, Richard L. LaGarde and Mary LaGarde, 230 Westcott St., Suite 100, Houston, Texas 77007.

Defendant Lottery Now, Inc, by and through its counsel, serves its objections and responses to Plaintiff Jerry B. Reed (“Plaintiff”) first set of interrogatories (the “Interrogatories”). The objections and responses are given without prejudice to Lottery Now, Inc’s right to produce evidence of subsequently discovered facts or documents. Lottery Now specifically reserves the right to change and supplement any and all answers herein as additional facts and documents are discovered or ascertained, and additional contentions are made, and to assert any privileges with respect thereto.

**I.
GENERAL OBJECTIONS**

Defendant objects that any discovery in this matter is premature as the parties have pending 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition. *See Bethel v. Quilling, Selander, Lownds, Winslett & Moser, P.C.*, 595 S.W.3d 651, 656 (Tex. 2020) (noting that Rule 91a allows “courts to dismiss meritless cases before the parties engage in costly discovery.”). Discovery is

also premature in light of ColossusBets Limited's Application for Writ of Mandamus, pending in the Fifteenth Court of Appeals as Case No. 15-25-00150-CV, relating to whether the Third Division of the Business Court properly retains jurisdiction in this matter.

Lottery Now objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

Lottery Now objects to the instructions and definitions contained in the Interrogatories to the extent that they seek to impose on Lottery Now any obligation beyond what is required of it by the Texas Rules of Civil Procedure (the "Rules") and applicable case law.

Lottery Now objects to each interrogatory to the extent that it seeks the disclosure of information that is protected by the attorney-client privilege, the attorney work-product doctrine, consulting only expert privilege, the investigative privilege, and/or any other applicable privilege.

Lottery Now further objects to Plaintiff's definitions of the words "**Identify**," "**Document**," and "**Communications**" as overbroad and unduly burdensome to the extent they relate to persons and entities other than Plaintiff or Lottery Now. Lottery Now also objects that the definition of "**Identify**" seeks confidential information belonging to third parties and information not relevant to the subject matter of the pending action or any party's claim or defense, nor reasonably calculated to lead to the discovery of admissible evidence, including, but not limited to, titles, employers, and present business and home addresses for natural persons.

Lottery Now objects to the definition of "**You**" or "**Your**" as vague, ambiguous, overbroad, and unduly burdensome and oppressive to the extent this definition purports to bring within the ambit of the requests persons and entities other than Lottery Now. Lottery Now responds to these requests on its behalf. Lottery Now further objects to this definition to the extent it calls for the

disclosure of documents or information protected from discovery by the attorney-client privilege and/or work product doctrine.

Lottery Now objects to that the defined phrase “**The Bulk Purchase**” assumes facts not in evidence, and specifically assumes that there has been a “coordinated acquisition of an unusually large number of Lotto Texas Tickets for the April 22, 2024 drawing.” Lottery Now further objects that the phrase “unusually large number of Lotto Texas tickets” is vague and ambiguous as it is open to multiple interpretations.

Lottery Now objects to that the defined term “**Winnings**” as it contains the defined phrase “**The Bulk Purchase.**” Lottery Now further objects that the definition is overbroad, vague, and ambiguous as to the phrases “entitled to be received” and “any associated financial benefits derived from such winnings,” as they are open to multiple interpretations.

Lottery Now objects to the Interrogatories to the extent that they seek information that is neither relevant to the subject matter involved nor reasonably calculated to lead to the discovery of admissible evidence.

Lottery Now has not completed discovery in this lawsuit or preparation for trial. Therefore, the following responses are based upon information known at this time and are given without prejudice to its right to provide, use, and rely on any subsequently discovered information at trial.

Subject to and without waiving the foregoing General Objections, each of which is incorporated in Lottery Now’s specific answers to the Interrogatories, Lottery Now responds as follows:

II.
RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

State the nature and extent of Lottery Now, Inc.'s role, if any, in organizing, funding, or facilitating the Bulk Purchase of Texas lottery tickets for the April 22, 2023, Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 1:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts not in evidence. Lottery Now further objects that term "facilitating" is vague and ambiguous as it is open to multiple interpretations. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 2:

Identify all individuals and legal entities who retained, hired, or encouraged Lottery Now to print a larger than usual number of tickets for the April 22, 2023 drawing.

RESPONSE TO INTERROGATORY NO. 2:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "all individuals and legal entities" renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff's claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party's

claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the term “encouraged” and phrase “print a larger than usual number of tickets” are vague and ambiguous as they are open to multiple interpretations. Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 3:

Identify all individuals and legal entities who provided iPads or other electronic devices for use in printing tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 3:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects that the phrase “all individuals and legal entities” renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff’s claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party’s claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory is vague and ambiguous as it does not identify to whom persons allegedly “provided iPads or other electronic devices for use in printing tickets.” Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 4:

Identify all individuals and legal entities who provided QR codes for use in printing tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 4:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "all individuals and legal entities" renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff's claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory is vague and ambiguous as it does not identify to whom persons allegedly "provided QR codes for use in printing tickets." Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 5:

Identify all individuals and legal entities who provided high-speed printers for use in printing tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 5:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "all individuals

and legal entities” renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff’s claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party’s claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory is vague and ambiguous as it does not identify to whom persons allegedly “provided high-speed printers for use in printing tickets.” Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 6:

Identify all individuals who printed tickets at the Lottery Now facility for the April 22, 2023 Lotto Texas drawing, including each such person’s employer at the time.

RESPONSE TO INTERROGATORY NO. 6:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects that the phrase “all individuals” renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff’s claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party’s claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now objects that the phrase “the Lottery Now facility” is vague and ambiguous as it is open to multiple interpretations. Lottery Now objects to the extent this Interrogatory seeks the disclosure information that would violate the legitimate privacy rights and expectations of Lottery Now’s

employees, directors, officers, both current and former, and other individuals, to the extent that such privacy rights and expectations are protected by law, contract, or public policy. Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 7:

Identify all individuals and legal entities who provided guidance or advice to Lottery Now regarding the Bulk Purchase.

RESPONSE TO INTERROGATORY NO. 7:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "all individuals and legal entities" renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff's claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts not in evidence. Lottery Now objects that this Interrogatory seeks information protected by the attorney-client privilege or attorney work-product doctrine. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 8:

Describe the terms of any understandings, agreements, or contracts between Lottery Now and any other individual or legal entity regarding the printing of tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 8:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now objects that the undefined term "understandings" is vague and ambiguous as it is open to multiple interpretations. Lottery Now objects that the phrase "any other individual or legal entity" renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff's claims and allegations in this lawsuit. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 9:

Identify all individuals and legal entities who paid for the expenses incurred by Lottery Now in printing tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 9:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "all individuals

and legal entities” renders the Interrogatory overbroad as it potentially implicates persons who are in no way related to Plaintiff’s claims and allegations in this lawsuit. Lottery Now further objects that the phrase “expenses incurred” is overbroad, vague and ambiguous as it is open to multiple interpretations. As such, the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party’s claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Interrogatory assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 10:

Describe any wire transfers or other payments made to Lottery Now, Inc. related to the Bulk Purchase of tickets for the April 22, 2023 Lotto Texas drawing, including the sender, recipient, date, and amount of each transaction.

RESPONSE TO INTERROGATORY NO. 10:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now also objects that the defined phrase “Bulk Purchase” assumes facts not in evidence. Lottery Now further objects to the extent the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party’s claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects to the extent that the Interrogatory seeks information that would violate the legitimate privacy rights and expectations of third persons to the extent that such privacy rights and expectations are protected by law, contract, or public policy.

Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 11:

Describe whether Lottery Now, Inc. received, directly or indirectly, any portion of the \$60,264,030 in Texas Lottery winnings paid out to Rook TX LP and/or Rook GP, LLC in connection with the April 22, 2023 Lotto Texas drawing.

RESPONSE TO INTERROGATORY NO. 11:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the term "indirectly" is vague and ambiguous as it is open to multiple interpretations. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 12:

Identify and describe all communications between Lottery Now, Inc. and any of the following, from January 1, 2023, to July 1, 2023, relating to Lotto Texas drawings or the Bulk Purchase of Lotto Texas lottery tickets:

- a. ColossusBets Limited
- b. AutoLotto, Inc.
- c. Lottery.com, Inc.
- d. Qawi and Quddus, Inc.
- e. AltX Management, LLC
- f. Lawrence Anthony DiMatteo III

- g. Ryan Dickinson
- h. The Texas Lottery Commission or its Executive Director, Gary Grief
- i. IGT Global Solutions Corporation
- j. Glenn Gelband
- k. Maxime Herve
- l. Zeljko Ranogajec a/k/a John Wilson
- m. Bernard Marantelli
- n. White Swan Data Limited
- o. Gregg Potts
- p. Thomas Ashcroft
- q. Stanley Dickson
- r. The Trowbridge Law Firm
- s. William Dickson
- t. The Texas Rangers
- u. Ade Repcenko
- v. Spinola Gaming
- w. Any other individual or entity involved in the bulk purchase of Lotto Texas tickets for the April 22, 2023 drawing.

RESPONSE TO INTERROGATORY NO. 12:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the Interrogatory is compound and constitutes 23 separate interrogatories, exceeding the number allowed by the June

24, 2025 Scheduling Order and the Texas Rules of Civil Procedure. Lottery Now further objects that the phrase “[a]ll communications” renders the Interrogatory overbroad and unduly burdensome. Lottery Now further objects that this Interrogatory assumes facts not in evidence. Lottery Now further objects that the phrase “relating to Lotto Texas drawings” renders the Interrogatory overbroad, as it implicates communications that are not relevant to the subject matter of the pending action or any party’s claim or defense, and that are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects to the extent that the Request seeks communications that are prohibited from disclosure by applicable law. Lottery Now also objects that the defined phrase “Bulk Purchase” assumes facts not in evidence.

INTERROGATORY NO. 13:

Describe any payments or reimbursements made by or to Lottery Now, Inc. relating to the Bulk Purchase.

RESPONSE TO INTERROGATORY NO. 13:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects to the extent this Interrogatory seeks documents that are not relevant to the subject matter of the pending action or any party’s claim or defense, and are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the defined phrase “Bulk Purchase” assumes facts not in evidence. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 14:

Describe any internal communications by Lottery Now personnel regarding the Bulk Purchase.

RESPONSE TO INTERROGATORY NO. 14:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the Interrogatory is overbroad and unduly burdensome as it implicates communications that are not relevant to the subject matter of the pending action or any party's claim or defense, and that are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects to the extent the Interrogatory seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 15:

Describe the steps taken by Lottery Now to locate, collect, and preserve documents and data related to the Bulk Purchase.

RESPONSE TO INTERROGATORY NO. 15:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now also objects that the Interrogatory seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts

not in evidence. Lottery Now further objects that that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

INTERROGATORY NO. 16:

Describe the efforts made by Lottery Now to locate and produce documents responsive to Plaintiff's subpoena duces tecum, including all systems searched, search terms used, custodians interviewed, and individuals involved in the process.

RESPONSE TO INTERROGATORY NO. 16:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now also objects that the Interrogatory seeks communications and information protected by the attorney-client privilege or attorney work-product doctrine. Lottery Now further objects that the Interrogatory seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts not in evidence. Lottery Now objects to the request for information pertaining to "individuals involved in the process" to the extent the Interrogatory seeks the disclosure of information that would violate the legitimate privacy rights and expectations of Lottery Now's employees, directors, officers, both current and former, and other individuals, to the extent that such privacy rights and expectations are protected by law, contract, or public policy. Lottery Now further objects that the Interrogatories propounded by Plaintiff exceed the number allowed by the June 24, 2025 Scheduling Order and the Texas Rules of Civil Procedure.

Dated: September 22, 2025

Respectfully Submitted,

/s/ Aimee C. Oleson

AIMEE C. OLESON

Texas Bar No. 24036391

GRACE S. MILLER

Texas Bar No. 24132499

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Attorneys for Defendant Lottery Now, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record via the Court's e-file system on September 22, 2025.

/s/ Grace S. Miller _____

Grace S. Miller

EXHIBIT D

JERRY B. REED

Plaintiffs,

v.

ROOK TX, LP, et al.,

Defendants.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

353RD JUDICIAL DISTRICT

**DEFENDANT LOTTERY NOW, INC.’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S FIRST REQUEST FOR PRODUCTION**

TO: Jerry B. Reed, by and through his attorneys of record, Richard L. LaGarde and Mary LaGarde, 230 Westcott St., Suite 100, Houston, Texas 77007.

Defendant Lottery Now, Inc, by and through its counsel, submits the following objections and responses to Plaintiff Jerry Reed (“Plaintiffs”), first request for production. Lottery Now, Inc. (“Lottery Now”) specifically reserves the right to change and supplement any and all responses herein as additional facts and documents are discovered or ascertained, and additional contentions are made, and to assert any privileges with respect thereto.

**I.
GENERAL OBJECTIONS**

Defendant objects that any discovery in this matter is premature as the parties have pending 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition. *See Bethel v. Quilling, Selander, Lownds, Winslett & Moser, P.C.*, 595 S.W.3d 651, 656 (Tex. 2020) (noting that Rule 91a allows “courts to dismiss meritless cases before the parties engage in costly discovery.”). Discovery is also premature in light of ColossusBets Limited’s Application for Writ of Mandamus, pending in the Fifteenth Court of Appeals as Case No. 15-25-00150-CV, relating to whether the Third Division of the Business Court properly retains jurisdiction in this matter.

Lottery Now objects to the production of original documents rather than photocopies for the reason that the originals are used in the ordinary course of business and are subject to being misused, misplaced or mislaid if they are produced.

Lottery Now objects to each request for production (“Request”) to the extent that it seeks the disclosure of information that is protected by the attorney-client privilege, the attorney work-product doctrine, consulting only expert privilege, the joint defense privilege, the investigative privilege, and/or any other applicable privilege.

Lottery Now objects to the definition of “**You**” or “**Your**” as vague, ambiguous, overbroad, and unduly burdensome and oppressive to the extent this definition purports to bring within the ambit of the requests persons and entities other than Lottery Now. Lottery Now responds to these requests on its behalf. Lottery Now further objects to this definition to the extent it calls for the disclosure of documents or information protected from discovery by the attorney-client privilege and/or work product doctrine.

Lottery Now further objects to Plaintiff’s definitions of the words “**Document**,” and “**Communications**” as overbroad and unduly burdensome to the extent they relate to persons and entities other than Plaintiff or Lottery Now.

Lottery Now objects to that the defined phrase “**The Bulk Purchase**” assumes facts not in evidence, and specifically assumes that there has been a “coordinated acquisition of an unusually large number of Lotto Tickets for the April 22, 2024 drawing.” Lottery Now further objects that the phrase “unusually large number of Lotto Texas tickets” is vague and ambiguous as it is open to multiple interpretations.

Lottery Now objects that Instruction 2(b) seeks confidential information belonging to third parties and information not relevant to the subject matter of the pending action or any party’s claim

or defense, nor reasonably calculated to lead to the discovery of admissible evidence, including, but not limited to, titles, employers, and present business and home addresses for natural persons.

A response to a specific document Request that states that Lottery Now will produce documents is not a representation that such documents exist or ever have existed, but instead is a representation that to the extent that such documents do exist and are in the possession, custody, or control of Lottery Now, they will be produced in accordance with the terms of the specific responses and General Objections.

Lottery Now objects to the Requests to the extent that they seek information that is neither relevant to the subject matter involved nor the claims or defenses asserted by any party.

Lottery Now objects to any Request that asks for the production of electronic or magnetic information that cannot be reasonably retrieved or produced in the form requested.

Lottery Now further objects to the production of documents containing confidential, trade secrets, proprietary information, or sensitive information belonging to third parties until such time as a protective order has been agreed to between the parties and approved by the Court.

Subject to and without waiving the foregoing General Objections, each of which is incorporated Lottery Now's specific responses to the Requests, Lottery Now responds as follows:

II.
RESPONSES TO REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All communications, agreements, or contracts between Lottery Now, Inc. and any other person or entity relating to the printing or sale of Lotto Texas tickets for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "[a]ll communications, agreements, or contracts" renders the request overbroad and unduly burdensome. Lottery Now also objects that the request for communications, agreements, or contracts between "any other person or entity" is overbroad and seeks documents that are not relevant to the subject matter of the pending action or any party's claim or defense, and that are not reasonably calculated to lead to the discovery of admissible evidence. Such irrelevant documents potentially include employment agreements, licensing agreements, and other documents that do not relate to the claims and allegations made in this lawsuit. Lottery Now further objects to the extent this Request seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine. Finally, Lottery Now objects to the extent the request seeks the disclosure of confidential trade secrets, financial, commercial, strategic, or otherwise proprietary and confidential information.

REQUEST FOR PRODUCTION NO. 2:

All documents identifying any individuals, legal entities, or business associations who were involved in or funded, directly or indirectly, the Bulk Purchase or printing of Lotto Texas tickets for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "[a]ll documents" renders the request overbroad and unduly burdensome. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts not in evidence. Lottery Now further objects that the terms "involved in" and "indirectly" are vague and ambiguous as they are open to multiple interpretations. Lottery Now further objects that the Request for information relating to "printing of Lotto Texas tickets" implicates every ticket printed by Lottery Now for the April 22, 2023 Lotto Texas drawing and thus seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects to the extent this request seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 3:

All documents reflecting the use or provision of devices, including iPads, QR codes, high-speed printers, or other electronic tools used in printing Lotto Texas tickets at Lottery Now locations for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "[a]ll documents" renders the request overbroad and unduly burdensome. Lottery Now further objects that the Request is vague and ambiguous as it does not identify to whom iPads, QR codes, high-speed printers, or other electronic tools were allegedly provided. Lottery Now also objects that the request assumes facts not in evidence. Lottery Now further objects to the extent the Request seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 4:

All transaction records, receipts, or internal logs showing the volume, timing, and sequence of tickets printed at any Lottery Now location for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "[a]ll transaction records, receipts, or internal logs" renders the request overbroad and unduly burdensome. Lottery Now further objects that the Request seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 5:

All wire transfers, bank records, or other payment documentation reflecting financial transactions between Lottery Now and any third party relating to the Bulk Purchase or printing of Lotto Texas tickets for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now further objects that the phrase "[a]ll wire transfers, bank records, or other payment documentation" renders the request overbroad and unduly burdensome. Lottery Now also objects that the phrase "any third party relating to the Bulk Purchase or printing of Lotto Texas tickets" implicates every ticket printed by Lottery Now for the April 22, 2023 Lotto Texas drawing and thus seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and that is not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the defined phrase "Bulk Purchase" assumes facts not in evidence. Lottery Now further objects that the request seeks confidential information belonging to third parties.

REQUEST FOR PRODUCTION NO. 6:

All documents reflecting payments made to or received by Lottery Now in connection with the \$60,264,030 lottery winnings ultimately paid to Rook TX LP and/or Rook GP, LLC for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending

Application for Writ of Mandamus. Lottery Now further objects that the phrase “[a]ll documents” renders the request overbroad and unduly burdensome. Lottery Now further objects that this Request assumes facts not in evidence.

REQUEST FOR PRODUCTION NO. 7:

All communications between Lottery Now and any of the following, from January 1 to July 1, 2023, concerning Lotto Texas or lottery ticket purchases in Texas:

- a. ColossusBets Limited
- b. AutoLotto, Inc.
- c. Lottery.com, Inc.
- d. Qawi and Quddus, Inc.
- e. AltX Management, LLC
- f. Lawrence Anthony DiMatteo III
- g. Ryan Dickinson
- h. Gary Grief or the Texas Lottery Commission
- i. IGT Global Solutions Corporation
- j. Glenn Gelband
- k. Maxime Herve
- l. Zeljko Ranogajec a/k/a John Wilson
- m. Bernard Marantelli
- n. White Swan Data Limited
- o. Gregg Potts
- p. Thomas Ashcroft
- q. Stanley Dickson

- r. William Dickson
- s. The Trowbridge Law Firm
- t. The Texas Rangers
- u. Ade Repcenko
- v. Spinola Gaming
- w. Any other individual or entity involved in the bulk purchase of Lotto Texas tickets for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects that the phrase “[a]ll communications” renders the request overbroad and unduly burdensome. Lottery Now further objects that this Request assumes facts not in evidence. Lottery Now further objects that the phrase “concerning Lotto Texas or lottery ticket purchases” renders the phrase overbroad, as it implicates communications that are not relevant to the subject matter of the pending action or any party’s claim or defense, and that are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects to the extent that the Request seeks communications that are prohibited from disclosure by applicable law. Lottery Now also objects that the defined phrase “Bulk Purchase” assumes facts not in evidence.

REQUEST FOR PRODUCTION NO. 8:

All internal emails, memos, text messages, or chat messages among Lottery Now employees or agents discussing the printing of tickets for the April 22, 2023 Lotto Texas drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects that the phrase “[a]ll internal emails, memos, text messages, or chat messages” renders the request overbroad and unduly burdensome. Lottery Now further objects that this Request assumes facts not in evidence. Lottery Now further objects that the phrase “discussing the printing of tickets for the April 22, 2023 Lotto Texas drawing” renders the Request overbroad, as it implicates communications that are not relevant to the subject matter of the pending action or any party’s claim or defense, and that are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects to the Request for communications from its “agents” to the extent the Request seeks documents that are not in Lottery Now’s possession, custody, or control. Lottery Now also objects to the extent the Request seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 9:

All documents reflecting payments or reimbursements made by or to Lottery Now relating to the April 22, 2023 Lotto Texas ticket purchases.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Lottery Now objects that discovery in this matter is premature in light of Defendants’ 91a Motions to Dismiss Plaintiff’s Fourth Amended Petition and ColossusBets Limited’s pending Application for Writ of Mandamus. Lottery Now further objects that the phrase “[a]ll documents” renders the request overbroad and unduly burdensome, including that the Request seeks documents reflecting payments or reimbursements that are not related to the claims or allegations at issue in

this case. As such, Lottery Now further objects that the Request seeks documents that are not relevant to the subject matter of the pending action or any party's claim or defense, and are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now further objects that this Request assumes facts not in evidence.

REQUEST FOR PRODUCTION NO. 10:

All documents regarding efforts undertaken by Lottery Now to collect, locate, and preserve responsive records, including custodian lists, search terms used, systems accessed, and personnel involved in the process.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now objects that the phrase "[a]ll documents" renders the request overbroad and unduly burdensome, and further objects that the Request is not limited in scope to the current lawsuit. Lottery Now also objects that the Request seeks documents that are not relevant to the subject matter of the pending action or any party's claim or defense, and are not reasonably calculated to lead to the discovery of admissible evidence. Lottery Now also objects that the Request seeks documents and communications protected by the attorney-client privilege or attorney work-product doctrine. Finally, Lottery Now objects to the Request for information pertaining to "personnel involved in the process" to the extent the Request seeks the disclosure of documents or information that would violate the legitimate privacy rights and expectations of Lottery Now's employees, directors, officers, both current and former, and other individuals, to the extent that such privacy rights and expectations are protected by law, contract, or public policy.

REQUEST FOR PRODUCTION NO. 11:

All photographs and videos depicting the printing of any Lotto Texas tickets by Lottery Now, Inc. for the April 22, 2023 drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now objects that the phrase "[a]ll photographs and videos" renders the request overbroad and unduly burdensome, and specifically that the Request as stated seeks photographs and videos of persons unrelated to the claims and allegations in this lawsuit. Therefore, the Request seeks information that is not relevant to the subject matter of the pending action or any party's claim or defense, and not reasonably calculated to lead to the discovery of admissible evidence. Further, Lottery Now objects to the extent that the Request seeks information that would violate the legitimate privacy rights of third persons to the extent that such privacy rights and expectations are protected by law, contract, or public policy. Finally, Lottery Now objects to the extent the request seeks the disclosure of confidential trade secrets, financial, commercial, strategic, or otherwise proprietary and confidential information.

REQUEST FOR PRODUCTION NO. 12:

All photographs and videos depicting the ticket or tickets printed by Lottery Now, Inc. that were identified as winning the April 22, 2023 Lotto Texas drawing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Lottery Now objects that discovery in this matter is premature in light of Defendants' 91a Motions to Dismiss Plaintiff's Fourth Amended Petition and ColossusBets Limited's pending Application for Writ of Mandamus. Lottery Now objects that the phrase "[a]ll photographs and

videos” renders the request overbroad and unduly burdensome. Further, Lottery Now objects to the extent that the Request seeks information that would violate the legitimate privacy rights of third persons to the extent that such privacy rights and expectations are protected by law, contract, or public policy. Finally, Lottery Now objects to the extent the request seeks the disclosure of confidential trade secrets, financial, commercial, strategic, or otherwise proprietary and confidential information.

Dated: September 22, 2025

Respectfully Submitted,

/s/ Aimee C. Oleson

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Attorneys for Defendant Lottery Now, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record via the Court's e-file system on September 22, 2025.

/s/ Grace S. Miller _____

Grace S. Miller

EXHIBIT E

Chief Justice
SCOTT BRISTER

Justices
SCOTT FIELD
APRIL FARRIS



Clerk
CHRISTOPHER A. PRINE

Fifteenth Court of Appeals

P.O. Box 12852, AUSTIN, TEXAS 78711
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Tuesday, September 30, 2025

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* DELIVERED VIA E-MAIL *

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RE: Court of Appeals Number: 15-25-00150-CV
Trial Court Case Number: 25-BC03A-0007

Style: In re ColossusBets Limited

Please be advised that Relator's motion to stay was DENIED by this Court on the date noted above.

Sincerely,

A handwritten signature in blue ink that reads "Christopher A. Prine".

Christopher A. Prine, Clerk

cc: The Honorable Melissa Davis Andrews (DELIVERED VIA E-MAIL)
Jonathan Sink (DELIVERED VIA E-MAIL)
Aimee C. Oleson (DELIVERED VIA E-MAIL)
Mary Lagarde (DELIVERED VIA E-MAIL)
Jeff Adams (DELIVERED VIA E-MAIL)
Jon Michael Smith (DELIVERED VIA E-MAIL)
Manfred Sternberg (DELIVERED VIA E-MAIL)
Lindsey Mitchell (DELIVERED VIA E-MAIL)
David E. Harrell Jr. (DELIVERED VIA E-MAIL)
Charles Conrad (DELIVERED VIA E-MAIL)
Beverly Crumley (DELIVERED VIA E-MAIL)
The Honorable Dibrell (Dib) W. Waldrip (DELIVERED VIA E-MAIL)

JERRY B. REED
Plaintiff

VS.

ROOK TX, LP et al.
Defendants

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
353rd JUDICIAL DISTRICT

ORDER GRANTING PLAINTIFF’S MOTION TO COMPEL

On this day, the Court considered **Plaintiff’s Motion to Compel Discovery Responses from Defendants Lottery Now, Inc. and Qawi and Quddus, Inc.** Having considered the motion, the arguments of counsel, and the record, the Court finds that the motion should be **GRANTED**.

IT IS THEREFORE ORDERED that **Defendants Lottery Now, Inc. and Qawi and Quddus, Inc.** shall serve full and complete responses, without objection (except for valid claims of privilege), to Plaintiff’s First Set of Interrogatories and First Request for Production of Documents within ten (10) days of the date of this Order.

SIGNED this ____ day of _____, 2025.

JUDGE PRESIDING

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Richard LaGarde on behalf of Richard LaGarde

Bar No. 11819550

richard@lagardelaw.com

Envelope ID: 107838387

Filing Code Description: Motion (No Fee)

Filing Description: PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES BY LOTTERY NOW, INC. AND QAWI AND QUDDUS, INC.

Status as of 11/12/2025 6:09 AM CST

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