

**CAUSE NO. 471-01040-2022**

**HENRY MISHKOFF**  
**Plaintiff,**

**V.**

**SONIA BRYANT,**  
**Defendant.**

§ **IN THE DISTRICT COURT**  
§  
§  
§ **DISTRICT COURT NO. 471**  
§  
§  
§ **COLLIN COUNTY, TEXAS**

**PLAINTIFF'S DISCLOSURES TO DEFENDANT**

TO: Defendant, SONIA BRYANT, by and through her attorney of record, T. Chase Garrett, Scheef & Stone, LLP.

Pursuant to Rule 194, Plaintiff hereby makes the following disclosures as follows:

THE LAW OFFICE OF ROBERT NEWTON, P.C.

*/s/ Robert Newton*

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Robert Newton  
Attorney for Plaintiff  
9355 John W. Elliott Dr., Ste 25450  
Frisco, TX 75034  
Ph. (214) 957-1292  
Email: RNEWTON@RNNLAW.COM

## PLAINTIFF'S DISCLOSURES

**194.2(b)(1):** the correct names of the parties to the lawsuit.

**RESPONSE:** To the best of Plaintiff's knowledge, the correct name of the parties to the lawsuit are Henry Mishkoff, Plaintiff, and Sonia Bryant, Defendant.

**194.2(b)(2):** the name, address, and telephone number of any potential parties.

**RESPONSE:** To the best of Plaintiff's knowledge, there are no other potential parties to the lawsuit.

**194.2(b)(3):** the legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

**RESPONSE:** Defendant refuses to allow Plaintiff to access a portion of his yard. Defendant has an easement, whether express or implied, for said purpose.

**194.2(b)(4)** the amount and any method of calculating economic damages.

**RESPONSE:** N/A

**194.2(b)(5)** the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

**RESPONSE:** The below parties have knowledge of relevant facts in this case.

Sonia Bryant  
Defendant  
c/o T. Chase Garrett, Scheef & Stone, LLP  
2600 Network Blvd., Suite 400, Frisco, Texas 75034  
(214) 472-2100

Henry Mishkoff  
Plaintiff  
c/o Robert Newton, The Law Office of Robert Newton, P.C.  
9355 John W. Elliott Dr., Ste 25450, Frisco, Texas 75034  
(214) 957-1292

Donna Mishkoff  
Plaintiff's spouse  
c/o Robert Newton, The Law Office of Robert Newton, P.C.  
9355 John W. Elliott Dr., Ste 25450, Frisco, Texas 75034  
(214) 957-1292

Robert Newton, The Law Office of Robert Newton, P.C.  
Plaintiff's counsel  
9355 John W. Elliott Dr., Ste 25450, Frisco, Texas 75034  
(214) 957-1292

**194.2(b)(6):** a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses, unless the use would be solely for impeachment.

**RESPONSE:** Plaintiff has photos and video recordings of encounters with the Defendant that it can share at a place and time suitable to the Defendant.

A copy of the Declaration of Covenants, Restrictions, and Conditions (Bently Court, Dallas Texas), shall be attached to the email providing these disclosures.

**194.2(b)(7)** any indemnity and insuring agreements described in Rule 192.3(f).

**RESPONSE:** N/A

**194.2(b)(8)** any settlement agreements described in Rule 192.3(g).

**RESPONSE:** N/A

**194.2(b)(9)** any witness statements described in Rule 192.3(h).

**RESPONSE:** N/A

**194.2(b)(10)** in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

**RESPONSE:** N/A

**194.2(b)(11)** in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

**RESPONSE:** N/A

