

# 2021-73278 / Court: 127

Case No. \_\_\_\_\_

JORDAN BADURA, § IN THE DISTRICT COURT OF

JENNA BADURA, §

AINEL BEKTEMIROVA, §

BRAULIO GARZA, AND §

EDWIN RAMIREZ, §

§

Plaintiffs, §

§

v. §

HARRIS COUNTY, TEXAS

§

LIVE NATION ENTERTAINMENT, INC., §

LIVE NATION WORLDWIDE, INC., LIVE §

NATION MARKETING, INC., JACQUES §

BERMAN WEBSTER II, CACTUS JACK §

RECORDS, LLC §

SCOREMORE LLC, SCOREMORE MGMT §

LLC, and SCOREMORE HOLDINGS, LLC §

§

Defendants. §

§ \_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION**

COME NOW Jordan Badura, Jenna Badura, Ainel Bektemirova, Braulio Garza, and Edwin Ramirez, complaining of the acts and omissions of Live Nation Entertainment, Inc., Live Nation Worldwide, Inc., Live Nation Marketing, Inc., Jacques Berman Webster II, Cactus Jack Records, LLC, Scoremore, LLC, Scoremore MGMT LLC, and Scoremore Holdings, LLC and would show the Court the following:

### **I. DISCOVERY CONTROL PLAN**

1. Plaintiffs request that discovery in this matter be conducted under Level 3 of the Texas Rules of Civil Procedure.

### **II. PARTIES & SERVICE**

2. Plaintiff Jordan Badura is an individual and resident of the state of Texas who can be reached through counsel of record, Zehl & Associates, PC.

3. Plaintiff Jenna Badura is an individual and resident of the state of Texas who can be reached through counsel of record, Zehl & Associates, PC.

4. Plaintiff Ainel Bektemirova is an individual and resident of the state of Texas who can be reached through counsel of record, Zehl & Associates, PC.

5. Plaintiff Braulio Garza is an individual and resident of the state of Texas who can be reached through counsel of record, Zehl & Associates, PC.

6. Plaintiff Edwin Ramirez is an individual and resident of the state of Texas who can be reached through counsel of record, Zehl & Associates, PC.

7. Defendant Live Nation Entertainment, Inc. is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant Live Nation Entertainment, Inc., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX

77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this defendant answer in its true name, if it differs from that outlined above.

8. Defendant Live Nation Worldwide, Inc. is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant Live Nation Worldwide, Inc., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this defendant answer in its true name, if it differs from that outlined above.

9. Defendant, Live Nation Marketing, Inc., is a corporation registered to conduct business in Texas and conducting a substantial amount of business in Texas on a continuous and systematic basis. Defendant Live Nation Marketing, Inc., may be served with process through its registered agent, Corporate Creations Network, Inc., 5444 Westheimer #1000, Houston, TX 77056. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this defendant answer in its true name, if it differs from that outlined above.

10. Defendant Jacques Berman Webster II a/k/a Travis Scott is an individual who resides in Harris County, Texas. This defendant is thus a Texas citizen. He may be served at his home address or wherever he may be found. Plaintiffs request a citation. Plaintiffs additionally assert all rights and request all relief under Texas Rule of Civil Procedure 28 and demand that this defendant answer in its true name, if it differs from that outlined above.

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First appeared as part of the conference materials for the  
33<sup>rd</sup> Annual Entertainment Law Institute session

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