

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

KATHLEEN MOLLER	*	CIVIL ACTION NO. 24-0228-WBV-DPC
	*	
VERSUS	*	JUDGE WENDY B. VITTER
	*	
MARTIAN SALES, INC; JOPEN, LLC,	*	MAGISTRATE DONNA PHILLIPS
a Texas limited liability company;	*	CURRAULT
JOHNSON FOODS, LLC, a Wyoming	*	
limited liability company; LP IND., LLC,	*	
a Wyoming limited liability company;	*	
CAG HOLDINGS, LLC, a Wyoming	*	
limited liability company; RMH	*	
HOLDINGS, INC., a Wyoming	*	
corporation; ABC INSURANCE	*	
COMPANY and John Does 1-4.	*	
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NOTICE OF SUBMISSION

PLEASE TAKE NOTICE that Plaintiff, Kathleen Moller, through undersigned counsel, respectfully brings for submission a Motion for Partial Summary Judgment – Determination of Piercing the Veil, Single Business Enterprise, and Alter Ego for Jurisdictional Purposes before Honorable Wendy B. Vitter on the 22nd day of July, 2025, at 9:30 a.m.

Respectfully submitted:

WAGAR HICKMAN, LLC

s/ Nelson W. Wagar, III

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