

## Ruben Castro


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**From:** Kelly Haas <Khaas@sbsblaw.com>  
**Sent:** Tuesday, November 8, 2022 7:44 AM  
**To:** Ruben Castro  
**Cc:** Amy Durocher  
**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

### CAUTION - EXTERNAL:

Dear Mr. Castro,

The Rule C Verified Complaint, Motion for Issuance of an Order to Seize Vessel, with accompanying Order and Warrant can be accessed at the following link:

 [Arrest Documents - SWIFT WINCHESTER](#)

We will file them at 8:00 a.m. this morning.

Please advise if I should plan to come to the Houston or Galveston Courthouse to meeting with Judge Edison, or if the conference will be held by Zoom.

Thank you,

**Kelly M. Haas**

D: 713.893.6168 | M: 832.465.1176



Schouest  
Bamdas  
Soshea  
BenMaier  
& Eastham

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**From:** Kelly Haas  
**Sent:** Monday, November 7, 2022 3:17 PM  
**To:** 'Ruben Castro' <Ruben\_Castro@txs.uscourts.gov>  
**Cc:** Amy Durocher <adurocher@sbsblaw.com>  
**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

Dear Mr. Castro,

Given the current schedule of the vessel, we plan to file our Verified Complaint to Arrest at 0800 hrs tomorrow, Tuesday, November 8. I will email you copies once it is filed and ask if possible, to have the Complaint heard by Judge Edison before 0900 hrs.

The vessel will only be in the jurisdiction until 1300 hrs, so we need to ensure enough time for the US Marshal to travel to Galveston, take a launch to the vessel and serve the Warrant while she is there.

We are concerned that the vessel owners will have time to move the vessel outside of the 12 nm range if we file the Complaint earlier than the proposed time above.

Please advise if this timing will work for the Court.

Thank you for your continued assistance.

Best regards,

Kelly M. Haas

D: 713.893.6168 | M: 832.465.1176



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Bamdass  
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BenMaier  
& Eastham

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**From:** Kelly Haas

**Sent:** Monday, November 7, 2022 9:24 AM

**To:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

Dear Mr. Castro,

There were delays in getting the vessel moving this morning due to the fog. I will have an updated time for arrival in the jurisdiction and our filing of the complaint after a conference with my clients at 10:30 a.m. CT.

I appreciate your continued assistance with this matter.

Best regards,

Kelly M. Haas

D: 713.893.6168 | M: 832.465.1176



Schouest  
Bamdass  
Soshea  
BenMaier  
& Eastham

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**From:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Sent:** Monday, November 7, 2022 9:21 AM

**To:** Kelly Haas <[Khaas@sbsblaw.com](mailto:Khaas@sbsblaw.com)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

Good morning,

Email me as soon as the complaint is filed and we will take care of it ASAP. Thanks.



Ruben Castro  
Case Manager for US Magistrate Judge Andrew M. Edison  
United States District Court  
Southern District of Texas  
(409) 766-3555

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**From:** Kelly Haas <[Khaas@sbsblaw.com](mailto:Khaas@sbsblaw.com)>

**Sent:** Sunday, November 6, 2022 3:29 PM

**To:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

**CAUTION - EXTERNAL:**

Dear Mr. Castro,

We believe that the vessel will arrive in the jurisdiction of the court early tomorrow morning and will be present for only about three hours. As such, the timing of the filing of the Complaint and service by the Marshal once the Order and Warrant of Arrest are issued is on a quick turnaround.

For logistics given that Judge Edison sits in Galveston and Houston, I wanted to check to see where I should plan to appear to have my Complaint heard, or will he hold the hearing over Zoom.

Thank you in advance for your help.

Best regards,

Kelly M. Haas

D: 713.893.6168 | M: 832.465.1176



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**From:** Kelly Haas

**Sent:** Friday, November 4, 2022 4:23 PM

**To:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

Mr. Castro,

Due to the forecasted weather tonight, the subject vessel is delayed coming into Galveston. We are now looking at Monday at the earliest for us filing the Complaint to Arrest the vessel.

I will continue to keep you updated.

Thank you for your assistance with this matter,

Best regards,

**Kelly M. Haas**

D: 713.893.6168 | M: 832.465.1176



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& Eastham

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**From:** Kelly Haas

**Sent:** Thursday, November 3, 2022 2:07 PM

**To:** 'Ruben Castro' <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

Mr. Castro,

I have alerted the US Marshal of the planned arrest and they are prepared to serve the vessel once the court issues the necessary order and warrant.

The vessel will not remain in the area very long once it arrives in the Bolivar Roads, Galveston area. As such, it is imperative that we are able to have our Complaint considered by the court soon after filing.

Thank you for your understanding and continued assistance.

Best regards,

**Kelly M. Haas**

D: 713.893.6168 | M: 832.465.1176



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**From:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Sent:** Thursday, November 3, 2022 2:04 PM

**To:** Kelly Haas <[Khaas@sbsblaw.com](mailto:Khaas@sbsblaw.com)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** RE: Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

If you file over the weekend please be sure and send me a courtesy copy of anything filed. I will then get in touch with the Judge. Be sure you let the U.S. Marshal in Galveston know what you have coming. Thanks.



Ruben Castro  
Case Manager for US Magistrate Judge Andrew M. Edison  
United States District Court  
Southern District of Texas  
(409) 766-3555

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**From:** Kelly Haas <[Khaas@sbsblaw.com](mailto:Khaas@sbsblaw.com)>

**Sent:** Thursday, November 3, 2022 11:45 AM

**To:** Ruben Castro <[Ruben\\_Castro@txs.uscourts.gov](mailto:Ruben_Castro@txs.uscourts.gov)>

**Cc:** Amy Durocher <[adurocher@sbsblaw.com](mailto:adurocher@sbsblaw.com)>

**Subject:** Notice of Filing of Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5

**CAUTION - EXTERNAL:**

Dear Mr. Castro,

I wanted to provide the court with notice that we will likely be filing a Rule C Verified Complaint, a Motion for Issuance of an Order to Seize Vessel with an accompanying Order and Warrant on Saturday, November 5. The timing of it being done over the weekend is due to the ETA of the vessel in the jurisdiction of the court in Galveston. Please advise of the procedures for me to contact the court regarding our filings and getting the Order and Warrant signed.

Thank you in advance for your assistance with this matter.

Best regards,

**Kelly M. Haas**  
Partner



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Houston | Texas | 77002  
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