

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MYADVERTISINGPAYS (MAP) LIMITED,)
an Anguillan corporation,)
)
Plaintiff,)

v.)

Case No. 4:16-cv-3541

VX GATEWAY CORP., a Texas corporation,)
VX GATEWAY, INC., a Panamanian corporation,)
VX GATEWAY LIMITED, a United Kingdom)
limited company, CELIA DUNLOP, an individual,)
and TIMOTHY MACKAY, an individual,)
)
Defendants.)

**PLAINTIFF’S REQUEST FOR
EMERGENCY HEARING ON TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 3 of the Court’s Procedures, Plaintiff MyAdvertisingPays (MAP) Limited (“MAP”) files this Request for Emergency Hearing on Temporary Restraining Order.

1. On December 1, 2016, MAP filed its Complaint, along with a Motion for Temporary Restraining Order, Motion for Preliminary Injunction, and a Memorandum in support thereof [Dkts. 1, 2, 3, 4].

2. On December 2, 2016, the case was assigned to the Honorable Nancy F. Atlas. Therefore, in compliance with Rule 3 of the Court’s Procedures, MAP sent the e-mail attached hereto as Exhibit “A” to the individual defendants in this action (Celia Dunlop and Timothy Mackay) and to the attorney (Andrew Chetcuti Ganado) representing the corporate defendants. Defendant Dunlop is also the President and Director of Defendant VX Gateway Corp. Accordingly, counsel affirms that it has contacted the Defendants and delivered to them copies of all documents filed in this action.

3. As of the filing of this Request, MAP affirms that the Defendants have not responded to the e-mail.

4. Given the nature of MAP's Motion for Temporary Restraining Order, MAP requests the Court set a hearing on its Motion on (i) Monday, December 5, 2016, (ii) Tuesday, December 6, 2016, or (iii) at the earliest convenience of the Court.

Dated: December 2, 2016

Respectfully Submitted,

By: /s/ J. Cary Gray

J. Cary Gray
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MYADVERTISINGPAYS (MAP) LIMITED

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on the following parties and persons via electronic mail on this 2nd day of December, 2016:

Celia Dunlop (celia.dunlop@vxgateway.com)
Timothy Mackay (timothy.mackay@vxgateway.com)
Andrew Chetcuti Ganado (acganadolegal@gmail.com)

Michael A. Ackal, III
Michael A. Ackal, III

EXHIBIT “A”

Mitch A. Ackal

From: Jonathan Herpy <jdavid@hartdavidlaw.com>
Sent: Friday, December 02, 2016 11:58 AM
To: Andrew Chetcuti Ganado; Tim Mackay; Celia Dunlop
Cc: Meagan Glover; Matthew E. Vogler; J. Cary Gray; Mitch A. Ackal
Subject: MyAdvertisingPays (MAP) Ltd. v VX Gateway Corp., et. al. - 4:16-cv-3541
Attachments: 2016.12.01 [Dkt. 1] Complaint.pdf; 2016.12.01 [Dkt. 2] Motion for TRO.pdf; 2016.12.01 [Dkt. 3] Motion for Preliminary Injunction.pdf; 2016.12.01 [Dkt. 5] Notice of Appearance (Glover).pdf; 2016.12.01 [Dkt. 6] Notice of Appearance of J. Cary Gray.pdf; 2016.12.01 [Dkt. 4] Memorandum of Law in Support of TRO and PI copy.pdf

Mr. Ganado:

Attached please find the following:

- 1) Complaint at Law – MyAdvertisingPays (MAP) Ltd. v. VX Gateway Corp., et. al. (4:16-cv-3541)
- 2) Plaintiffs Motion for a Temporary Restraining Order – (4:16-cv-3541)
- 3) Plaintiffs Motion for Preliminary Injunction – (4:16-cv-3541)
- 4) Memorandum in Support of Plaintiff’s Motion for a Temporary Restraining Order and Preliminary Injunction – (4:16-cv-3541)
- 5) Notice of Appearance of Meagan W. Glover, as counsel for Plaintiff - (4:16-cv-3541)
- 6) Notice of Appearance of J. Cary Gray, as lead attorney for Plaintiff – (4:16-cv-3541)

Please note that, due its file size, Exhibit 3 of Exhibit C to the Memorandum in Support of Plaintiff’s Motion for a Temporary Restraining Order and Preliminary Injunction can be found via the following link:

<https://www.dropbox.com/s/nmofwmh1sflk2ik/2016.12.01%20%5BDkt.%204%5D%20Memorandum%20of%20Law%20in%20Support%20of%20TRO%20and%20PI.pdf?dl=0>

Please be advised that our local counsel will be communicating with the court regarding scheduling an initial conference related to an emergency conference on our motion for a temporary restraining order. Accordingly, please advise of your availability for said conference, that is expected to occur at some point next week. We anticipate having a date certain by close-of-business today.

Feel free to contact me with any questions.

--
Jonathan D. Herpy, Sr.
Partner



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