

# **EXHIBIT A**

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

JERRY RODRIGUEZ

Plaintiff,

v.

REMY COEYTAUX

Defendant.

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C.A. NO. 3:25-cv-00225

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**DECLARATION OF CHRISTOPHER M. ODELL IN SUPPORT OF  
DEFENDANT DR. REMY COEYTAUX’S MOTION TO DISMISS**

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CHRISTOPHER M. ODELL declares and states the following:

1. I am an attorney with Arnold & Porter Kaye Scholer LLP, counsel for Defendant Dr. Remy Coeytaux in the above-captioned case.
2. I submit this declaration in support of Dr. Coeytaux’s Motion to Dismiss.
3. Attached as **Exhibit A** is a true and correct copy of the March 3, 2006, judgment from the Harris County Criminal Court of Law No. 14 in *State of Texas v. Jerry Hernandez Rodriguez* (Cause No. 1206351), which is available at [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com).
4. Attached as **Exhibit B** is a true and correct copy of the August 29, 2025, grand jury indictment of Jerry Rodriguez in the 488<sup>th</sup> District Court of Harris County (Cause No. 1891172), which is available at [www.hcdistrictclerk.com](http://www.hcdistrictclerk.com).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 16, 2026.

/s/ Christopher M. Odell  
Christopher M. Odell

# **EXHIBIT A**



JUDGMENT ON PLEA OF GUILTY/NOLO CONTENDERE/NOT GUILTY BEFORE COURT-WAIVER OF JURY TRIAL

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CAUSE NO. 1206351

THE STATE OF TEXAS VS.

IN THE DISTRICT COURT

Gerry Hernandez Rodriguez (Name of Defendant)

COUNTY CRIMINAL COURT AT LAW NO. 124

AKA

OF HARRIS COUNTY, TEXAS

Date of Judgment: MAR 03 2006 Date Sentence Imposed: MAR 03 2006 Sentence to Begin: MAR 03 2006 Date of Offense: 11-18-03

Attorney for State: C. Binum

Attorney for Defendant: J. Pios Defendant Waived Counsel

Offense Convicted of: Assault - Family member

A MISDEMEANOR CLASS: A B C A FELONY, DEGREE: SJ 3rd 2nd 1st CAPITAL

Terms of Plea Bargain (In Detail): 4 days HC to 2 days credit

Plea to Enhancement Paragraph(s): True Not True N/A True Not True N/A Charging Instrument: Complaint Indictment Information Findings on Enhancement(s): True Not True N/A True Not True N/A Plea: Guilty Nolo Contendere Not Guilty

Affirmative Findings: Deadly Weapon: Yes No N/A Family Violence: Yes No N/A Victim Selected by Bias/Prejudice: Yes No N/A Victim Younger Than 17 years: Yes No N/A Controlled Substance Used to Commit Crime: Yes No N/A

Punishment Imposed and Place of Confinement: (Mark all that apply) Institutional Division, TDCJ Sentence suspended, Defendant placed on community supervision for Harris County Jail SEE SPECIAL INSTRUCTIONS, incorporated herein by reference. Fine in the Amount of: \$ Fine Only

Time Credited: days toward incarceration days toward fine and costs days toward incarceration, fine and costs COURT COSTS: \$259.00

- (Mark appropriate selections below, if applicable) Name changed from Judgment Addendum incorporated herein by reference. Driver's license is suspended for a period of days/months/years. The Defendant is entitled to days credit toward suspension of driver's license. It is ORDERED by the Court, that any weapon(s) seized in this case is/are hereby forfeited. Educational program waived in accordance with Article 42.12 Sec. 13 (h), upon a finding of good cause by the Court. In accordance with Section 12.44(a), Penal Laws of Texas, the Court finds that the ends of justice would best be served by punishment as a Class A misdemeanor. The Defendant is adjudged to be guilty of a state jail felony and is assessed the punishment indicated above. In accordance with Section 12.44(b), Penal Laws of Texas, the Court authorizes the prosecuting attorney to prosecute this cause as a Class A misdemeanor. The Defendant is adjudged to be guilty of a Class A misdemeanor and is assessed the punishment indicated above.

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This cause being called for trial, in Harris County, Texas, unless otherwise referenced, the State appeared by her District Attorney as named above and the Defendant named above appeared in person with Counsel as named above; or the Defendant knowingly, intelligently, and voluntarily waived the right to representation by counsel as indicated above in writing in open court, and both parties announced ready for trial. The Defendant waived his right of trial by jury, and pleaded as indicated above. Thereupon, the Defendant was admonished by the Court as required by law. It appearing to the Court that the Defendant is mentally competent to stand trial, that the plea is freely and voluntarily made, and that the Defendant is aware of the consequences of his plea; the plea is hereby received by the Court and entered of record. The Court having heard the evidence submitted found the Defendant guilty of the offense indicated above. The Defendant was granted the right of allocution and answered nothing in bar thereof. The Court proceeded in the presence of the Defendant to pronounce sentence against the Defendant.

IT IS ORDERED AND ADJUDGED by the Court that the Defendant is guilty of the offense indicated above, and that the Defendant committed the offense on the date indicated above, and that the Defendant be punished as indicated above for the period indicated above, and that the State of Texas do have and recover of the Defendant all costs of the prosecution for which execution will issue. Further, the Court finds the Presentence Investigation, if so ordered, was done according to the applicable provisions of Art. 42.12, Sec. 9, Code of Criminal Procedure.

IT IS ORDERED by the Court that if the punishment assessed against the Defendant is confinement in the Institutional Division or the State Jail Division of the Texas Department of Criminal Justice (TDCJ) that the Defendant be delivered by the Sheriff of Harris County, Texas immediately to the Director of the Institutional Division or the State Jail Division, TDCJ, or any other person legally authorized to receive such convicts, and said Defendant shall be confined in the Institutional Division or State Jail Division, TDCJ for the period indicated above, in accordance with the provisions of the law governing the Institutional Division or State Jail Division, TDCJ. The Defendant is remanded to the custody of the Sheriff of Harris County until said Sheriff can obey the directions of this sentence.

IT IS ORDERED by the Court that if the punishment assessed against the Defendant is confinement in the Harris County Jail that the Defendant is remanded to the custody of the Sheriff of Harris County, Texas; unless the Defendant is instructed to voluntarily surrender to the Sheriff on the date the sentence is to begin, as indicated above. The Sheriff shall confine the Defendant in the Harris County Jail as required by law.

IT IS ORDERED by the Court that if the punishment assessed against the defendant is for a fine only, the Defendant is ordered to immediately proceed to the Office of the Harris County Sheriff and pay all fine and court costs as ordered by the Court in this cause; unless the Court orders the Defendant to be committed to the custody of the Sheriff of Harris County, Texas on the date the sentence is to begin, as indicated above, to be confined in the Harris County Jail until the fine and costs are fully satisfied in accordance with law; or as indicated above.

IT IS ORDERED by the Court that the sentence indicated above is to be executed, unless it is indicated above that the sentence is to be suspended, and if so, the Defendant is placed on community supervision for the period indicated above pending his abiding by and not violating the terms and conditions of his community supervision.

IT IS ORDERED by the Court that this sentence runs concurrent with any other sentence(s) unless it is indicated on the Judgment Addendum that the sentence is to run cumulatively.

Signed and entered on MAR 03 2006  
[Signature]  
X M. Fields  
JUDGE PRESIDING

Community Supervision Expires on: \_\_\_\_\_

Notice of Appeal: \_\_\_\_\_

Mandate Received: \_\_\_\_\_

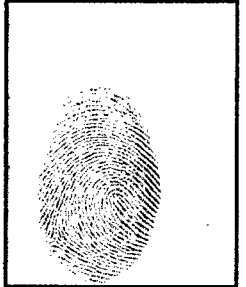
After Mandate Received, Sentence to Begin Date is: \_\_\_\_\_

Received on \_\_\_\_\_ at \_\_\_\_\_ AM | PM.  
Sheriff, Harris County, Texas

By: \_\_\_\_\_ Deputy

SPECIAL INSTRUCTION OR NOTES: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Entered [Signature]  
Verified \_\_\_\_\_  
LCBT [Signature]  
LCBU \_\_\_\_\_



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Certified Document Number: 20208713 - Page 2 of 2



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 9, 2026

Certified Document Number: 20208713 Total Pages: 2

The signature is written in a fluid, cursive hand, with the first letters of the first and last names being capitalized and prominent.

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# **EXHIBIT B**

THE STATE OF TEXAS  
VS.  
JERRY RODRIGUEZ  
714 LOCHNELL  
HOUSTON, TX 77068

B

SPN: 00784223  
DOB: W M 9/19/1968  
DATE PREPARED: 8/29/2025

D.A. LOG NUMBER: 3187572  
CJIS TRACKING NO.: 9272546168D001  
BY: CM DA NO: 3114774  
AGENCY: WPD  
O/R NO: 2402489  
ARREST DATE: 7/8/2025

NCIC CODE: 139909  
FELONY CHARGE: ASSLT FAM/HOUSEHOLD MEM W/PREV CONV

RELATED CASES:

CAUSE NO: 1891172  
HARRIS COUNTY DISTRICT COURT NO: 4888  
FIRST SETTING DATE:

COURT ORDERED BAIL:  
PRIOR CAUSE NO:  
CHARGE SEQ NUM: 1

**IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:**

The duly organized Grand Jury of Harris County, Texas, presents in the District Court of Harris County, Texas, that in Harris County, Texas, **JERRY RODRIGUEZ**, hereafter styled the Defendant, heretofore on or about **October 29, 2024**, did then and there unlawfully, intentionally, knowingly, or recklessly cause bodily injury to Kendal Garza, hereafter styled the Complainant, a person with whom the Defendant had a dating relationship, by striking the Complainant with the Defendant's hand.

It is further presented that before the commission alleged above, the Defendant, on March 3, 2006, in County Criminal Court at Law No. 14 of Harris County, Texas in Cause No. 1206351, was convicted of assault, which was committed against a member of the Defendant's household.

**FILED**  
Marilyn Burgess  
District Clerk

AUG 29 2025 1330

Time: \_\_\_\_\_  
Harris County, Texas

By Aime Hinojosa  
Deputy

Foreman 184th

*Russell Wickmann*

AGAINST THE PEACE AND DIGNITY OF THE STATE.

FOREMAN OF THE GRAND JURY

INDICTMENT



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this March 9, 2026

Certified Document Number: 122396439 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**