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August 6, 2021

The Honorable Ursula A. Hall  
Harris County Civil Courthouse  
201 Caroline, 12th Floor  
Houston, Texas 77002

Re: Cause No. 2019-18855; *Princeton Capital Corporation v. Great Value Storage LLC, World Class Capital Holdings, LLC, and Natin Paul*; In the 165th Judicial District, Harris County, Texas.

To the Honorable Ursula Hall:

I write regarding Princeton's **Motion for Post-Judgment Receivership** seeking to appoint receiver Mr. Seth Kretzer, which is under submission before this Court.

This Court entered the Final Judgment in this debt-collection, breach of contract matter on March 4, 2021, awarding plaintiff Princeton its approximately \$9,759,713.84 in unpaid debt, as well as interest and attorney's fees, against Defendants Great Value Storage LLC and World Class Capital Holdings LLC.

Defendants (the Judgment-Debtors) now seek to evade this Court's Final Judgment. Defendants have not paid the judgment or posted a supersedeas bond. And Defendants completely refuse to produce *any* documents at all in response to Princeton's properly-served post-judgment discovery.<sup>1</sup>

Princeton is left with no option but to ask for this Court's assistance in appointing an experienced receiver, Mr. Seth Kretzer, to act as the Court's agent to collect this Court's outstanding judgment and protect any possible assets which may be used to satisfy the judgment. *Time is of the essence*, as Defendants and their related entities are subject to a number of other litigation matters relating to financial fraud, breach of contract, and bankruptcies.

<sup>1</sup> As this Court no doubt remembers, Defendants in this case completely refused to participate in *any* fact discovery in the underlying case. Defendants produced zero documents and refused to put up their CEO and sole owner, Mr. Nate Paul, for a deposition. Princeton was forced to file a motion for sanctions for Defendants' egregious litigation behavior, which ultimately was not reached because this Court granted Princeton's summary judgment motion.

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In the interests of preserving the further resources of the Court and the parties, Princeton respectfully asks the Court to grant its Motion appointing Mr. Kretzer as receiver.

I appreciate the Court's time and attention in this case.

Sincerely,



Abigail Noebels

CC: Counsel for Defendants via e-filing