

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JAMES DE LOS SANTOS,

Plaintiff,

v.

CHARLES EDWIN SHOFFNER, et al.,

Defendants.

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Civil Action No. 3:26-cv-00122-K-BK

**PLAINTIFF’S NOTICE OF FILING DOCUMENTARY EXHIBITS
IN SUPPORT OF THE FIRST AMENDED VERIFIED COMPLAINT**

TO THE HONORABLE COURT:

Plaintiff James De Los Santos, pro se, respectfully files the following documentary exhibits in support of the First Amended Verified Complaint (the “Complaint”), and in support states as follows:

1. Plaintiff files two first-party documents issued by **Defendant** Shoffner's entity, identified as:
 - a. Exhibit 1 — Mattress By Appointment Business Manual; and
 - b. Exhibit 2 — Mattress By Appointment New Dealer Success Kit (dated 2.8.24).
2. Plaintiff files these documents in support of, and to complete the evidentiary record underlying, allegations already pleaded in the Complaint, including without limitation Plaintiff’s allegations concerning the prescribed operating system and franchise-level operational control (Compl. ¶¶ 181–184, 204–207); the exclusive-dealing requirements imposed on Plaintiff (Compl. ¶¶ 149–161); the bait-and-switch sales scheme (Compl. ¶¶

210–214); and the concealment of the Dealer Agreement within the New Dealer Success Kit binder (Compl. ¶¶ 121–139, 190–203).

3. Exhibit 2 is the “New Dealer Success Kit” binder described in the Complaint at ¶¶ 123–126 and depicted in Exhibit BB to the Complaint. As pleaded in the Complaint at ¶ 134, Plaintiff has consistently maintained his willingness to submit this binder to the Court, and now does so in complete form. The binder’s structure—with the operative Dealer Agreement placed behind a tab labeled “Reference Documents” rather than any designation indicating contractual significance—corroborates the concealment alleged in the Complaint.
4. By submitting these documents, Plaintiff does not concede — and expressly disputes — any designation of the documents or their contents as “confidential,” “proprietary,” or “trade secret.” See Compl. ¶ 134. Plaintiff submits the documents solely as first-party materials relevant to the conduct alleged in the Complaint.
5. Because Plaintiff’s continued possession of the original materials may be affected by proceedings in another forum, Plaintiff submits complete copies now in order to preserve the documentary record in this action. This submission is made without prejudice to, and in furtherance of, Plaintiff’s pending objections and requests for reconsideration concerning the orders entered in the Western District of Texas.
6. Plaintiff files these exhibits for the Court’s record. Plaintiff does not seek any ruling or relief through this Notice. Nothing in this submission is intended to supplement, amend, or modify the allegations of the Complaint; the exhibits are submitted only as documentary support for allegations already pleaded and to preserve the record in this action.

WHEREFORE, Plaintiff respectfully files Exhibit 1 and Exhibit 2 for the Court’s record in this action in support of the First Amended Verified Complaint.

Dated: June 29, 2026.

Respectfully submitted,

/s/ James De Los Santos
James De Los Santos
Plaintiff, pro se
1905 Willkommen Way
Pflugerville, Texas 78660
Telephone: 737-775-6880
Email: JmTexas3@gmail.com

VERIFICATION

I, James De Los Santos, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct based on my personal knowledge, and that Exhibit 1 and Exhibit 2 are true and correct copies of materials issued by **Defendant** Shoffner's entity.

Executed this 29th day of June, 2026, at Pflugerville, Texas.

/s/ James De Los Santos
James De Los Santos

CERTIFICATE OF SERVICE

I certify that on June 29, 2026, I electronically filed the foregoing, together with Exhibit 1 and Exhibit 2, with the Clerk of Court using the CM/ECF system, which will send notice of this filing to all counsel of record.

/s/ James De Los Santos
James De Los Santos