

2. PLAINTIFFS

2.1. Plaintiff Harris County, Texas (Harris County), a political subdivision of the State of Texas, filed this action pursuant to Texas Water Code (Water Code) § 7.351.

2.2. The State of Texas (the State), acting on behalf of the Texas Commission on Environmental Quality (TCEQ or Commission), is a necessary and indispensable party to this action. Tex. Water Code § 7.353.

3. DEFENDANT

3.1. J&S Water Company, L.L.C. (J&S) is a Texas Limited Liability Company doing business in Harris County. J&S may be served with process by serving its registered agent Charles Jerry Nowling at 8010 Thompson Road, Highlands, Texas 77562, or wherever he may be found.

4. JURISDICTION AND VENUE

4.1. This Court has jurisdiction over this case and venue is proper in Harris County because Harris County is the county in which all the violations occurred and this is an action to enforce the Chapter 26 of the Water Code and the TCEQ rules promulgated thereunder. Tex. Water Code § 7.105, 7.351.

4.2. On December 17, 2019, Harris County Commissioners Court issued an order authorizing Harris County to exercise its enforcement power in response to the Defendant's violations of the Water Code.

5. APPLICABLE LAW

A. Regulation of Water Quality

5.1. Authority. The TCEQ is the administrative agency that is primarily responsible for regulating water quality in this state. Tex. Water Code § 26.011. The TCEQ has adopted rules that further implement the requirements and restrictions of Chapter 26 of the Water Code. See generally 30 Tex. Admin. Code, Chapters 305, 321. Additionally, the TCEQ may issue permits and amendments to permits for the discharge of waste or pollutants into or adjacent to water in the state. Tex. Water Code § 26.027(a).

5.2. Unauthorized Discharges Prohibited. Except as authorized by the TCEQ, no person may discharge sewage¹ into or adjacent to any water in the state. Tex. Water Code § 26.121(a)(1). Under TCEQ rules, a permit issued under the Water Code, Chapter 26 is referred to as a “wastewater discharge permit.” 30 Tex. Admin. Code § 305.2(47).

5.3. Wastewater Facility Design Criteria. “An open valve box, pit, tank or basin with walls that extends less than 4.0 feet above ground must have a railing that extends from the top of the walls to at least 4.0 feet above ground level.” 30 Tex. Admin. Code § 217.325(b).

5.4. Wastewater Facility Access Control. A wastewater treatment facility must be completely enclosed by an intruder resistant fence and the top of the intruder resistant fence shall have at least three strands of barbed wire. 30 Tex. Admin. Code § 217.328(a)(4).

¹ “Sewage” means “waterborne human waste and water from domestic activities, such as washing, bathing, and food preparation.” Tex. Water Code § 26.001(7).

5.5. Facility Hazard Signs. A wastewater treatment facility must have hazard signs on the outward facing side of the fence, stating "DANGER--NO TRESPASSING" in English and Spanish. 30 Tex. Admin. Code § 217.328(b).

B. Enforcement: Injunctive Relief

5.6. Violation of a statute, rule, order or permit is prohibited. A person may not cause, suffer, allow, or permit a violation of a statute within the Commission's jurisdiction or a rule adopted or an order or permit issued under such statute. Tex. Water Code § 7.101.

5.7. A "person" includes "corporation, organization, government or governmental subdivision or agency, business trust, estate, trust, partnership, association, and any other legal entity." Tex. Gov't Code § 311.005(2).

5.8. Injunctive Relief. Harris County is authorized to file suit for injunctive relief for violations of Chapters 7 and 26 of the Texas Water Code and Commission rules promulgated under these statutes. Tex. Water Code § 7.105, 7.351.

5.9. Filing Fees and Bond. Harris County is not required to pay a filing fee or other security for costs and is not required to pay a bond prior to the Court granting an injunction. Tex. Civ. Prac. & Rem. Code § 6.001; Tex. Water Code § 7.032 and § 7.351.

6. BACKGROUND

6.1. J&S operates Five Oaks Mobile Home Park Wastewater Treatment Facility (the Facility) that discharges wastewater into Willow Creek. The Facility is located approximately 3,300 feet west from the bridge where Rothwood Road crosses Spring Creek in Harris County, Texas 77389.

6.2. On March 16, 2014, J&S was issued a Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0012382001 under which it was authorized to treat and discharge waste from the Facility only according with effluent limitations set forth in the permit. The TCEQ renewed TPDES Permit No. WQ0012382001 (WW Permit) on August 16, 2018. A copy of the WW Permit is attached as Exhibit A and is incorporated herein as set forth in full.

6.3. The WW Permit contains the following effluent limitations and monitoring requirements²:

- (1) Single grab samples of the effluent shall not exceed the following:³
 - a. Ammonia Nitrogen, 15 mg/l
 - b. *E. coli*, 200 mpn/100 ml
 - c. Carbonaceous Biochemical Oxygen Demand (CBOD), 35 mg/l
 - d. Total Suspended Solids (TSS), 60 mg/l
- (2) The effluent shall contact a chlorine residual of at least 1.0 mg/l and shall not exceed a chlorine residual of 4.0 mg/l.

7. HARRIS COUNTY INVESTIGATIONS

A. Harris County Pollution Control Services Investigations

7.1. Harris County Pollution Control Services (PCS) conducted investigations at the Facility on June 8, 2016, October 6, 2016, November 9, 2016, January 24, 2017, March 22,

² The TPDES Permit issued in 2014 includes the same Ammonia, *E. coli*, CBOD, TSS and Chlorine monitoring requirements as the current WW Permit.

³ WW Permit, Effluent Limitations and Monitoring Requirements, Page 2, ¶ 1.

2017, May 1, 2017, January 31, 2018, October 29, 2018, January 24, 2019, February 14, 2019, May 29, 2019, June 26, 2019, September 25, 2019, and December 9, 11, and 17, 2019. During these investigations, PCS investigators collected grab samples from the Facility's effluent that were tested for ammonia, *E. coli*, TSS, CBOD and chlorine.

(1) Grab sample results for ammonia nitrogen in the effluent samples were:

- a. June 8, 2016; 24.6 mg/l
- b. March 22, 2017, 29.2 mg/l
- c. May 1, 2017, 16.3 mg/l
- d. January 31, 2018, 30.2 mg/l
- e. October 29, 2018, 21.6 mg/l
- f. May 29, 2019, 30.0 mg/l
- g. December 9, 2019, 44.2 mg/l

(2) Grab sample results for *E. coli* in the effluent samples were:

- a. June 8, 2016; 870 mpn/100ml
- b. October 6, 2016; 4,900 mpn/100ml
- c. January 24, 2017; 1,700 mpn/100ml
- d. March 22, 2017, 92,000 mpn/100ml
- e. May 1, 2017, 440 mpn/100ml
- f. January 31, 2018, 10,000 mpn/100ml
- g. January 24, 2019, 250 mpn/100ml
- h. June 26, 2019, 4,900 mpn/100ml
- i. September 25, 2019, 210 mpn/100ml

- j. December 9, 2019, >240,000 mpn/100ml
 - k. December 17, 2019, >240,000 mpn/100ml (based preliminary laboratory results)
- (3) Grab sample results for total suspended solids in the effluent samples were:
- a. March 22, 2017, 897 mg/l
 - b. December 9, 2019, 124 mg/l
- (4) Grab sample results for carbonaceous biochemical oxygen demand in the effluent samples were:
- a. March 22, 2017, 108 mg/l
 - b. December 9, 2019, 133 mg/l
- (5) Grab samples results for chlorine in the effluent samples were:
- a. October 6, 2016, 0.06 mg/l
 - b. November 9, 2016, 5.94 mg/l
 - c. January 24, 2017, 0.02 mg/l
 - d. March 22, 2017, 0.14 mg/l
 - e. January 31, 2018, 0.40 mg/l
 - f. February 14, 2019, 6.95 mg/l
 - g. June 26, 2019, 0.31 mg/l
 - h. December 9, 2019, 0.20 mg/l
 - i. December 11, 2019, 40.01 mg/l
 - j. December 17, 2019, 0.04 mg/l

7.2. On August 31, 2019, in response to a complaint of a strong sewage-like odor PCS conducted an inspection of the Facility lift station at 0 Hobart Street, Spring, Texas. Upon arrival at the lift station, the PCS investigator observed wastewater overflowing from the lift station into the adjacent ditch. While taking video of the overflowing lift station, the investigator fell into the water well of the lift station because the lift station lacked a cover and did not have protective railing. In addition to the overflowing wastewater, PCS noted the following:

- (1) the wet well did not have a lid;
- (2) the open wet well did not have any railing to prevent someone from falling into the well;
- (3) the Facility fence did not include barbed wire on the entire top of the fence; and
- (4) the Facility did not have “Danger - No Trespassing” sign posted in the Spanish language.

7.3. On December 9, 2019, PCS conducted an investigation and found alarmingly high *E. coli* levels in excess of 240,000 mpn/100ml in the effluent, which is over a 1,000 times the permitted limit. *E. coli* levels at this level are indicative of untreated sewage. Additionally, PCS documented the presence of sewage sludge from the discharge in Willow Creek. *E. Coli* samples from Willow Creek were also in excess of 240,000 mpn/100/ml.

7.4. At a follow-up investigation on December 17, 2019, PCS once again found alarmingly high *E. coli* levels in excess of 240,000 mpn/100ml in the effluent, which is over a 1,000 times the permitted limit. *E. coli* levels at this level are indicative of untreated sewage

The Facility effluent chlorine levels were 0.05 mg/l, which is below the 1.0 mg/l minimum requirement.

7.5. Since 2016, PCS has issued a total of 13 Violation Notices (VNs) to the Facility on the following dates: July 1, 2016, December 7, 2016, January 25, 2017, February 15, 2017, June 5, 2017⁴, February 26, 2018, December 26, 2018, February 8, 2019, April 18, 2019, June 24, 2019, July 19, 2019, November 12, 2019 and December 13, 2019.

8. FIRST CLAIM: J&S VIOLATIONS AT THE FACILITY

A. Ammonia Nitrogen Violations

8.1. J&S violated the WW Permit, Effluent and Monitoring Requirements, Page 2, ¶ 1, Water Code §§ 7.101 and 26.121(a)(1) by exceeding the single grab limit of 15 mg/l for ammonia nitrogen at the Facility. Specifically, PCS investigations documented at the effluent exceeded the 15 mg/l grab limit for ammonia nitrogen on seven separate occasions. This constitutes a total of seven days of violation. Harris County is seeking civil penalties for violations that occurred prior to September 1, 2017.

B. *E. coli* Violations

8.2. J&S violated the WW Permit, Effluent and Monitoring Requirements, Page 2, ¶ 1, Water Code §§ 7.101 and 26.121(a)(1) by exceeding the single grab limit of 200 mpn/100ml for *E. coli* at the Facility. Specifically, PCS investigations documented at the effluent exceeded the 200 mpn/100ml grab limit for *E. coli* on eleven separate occasions. **The most recent result of more than 240,000 mpn/100ml on December 9 and 17, 2019, is over**

⁴ Two separate VNs were issued on June 5, 2017; one for violations that occurred on March 22, 2017 and another for violations that occurred on May 1, 2017.

1,000 times the permitted limit. This constitutes a total of eleven days of violation. Harris County is seeking civil penalties for violations that occurred prior to September 1, 2017.

C. TSS Violations

8.3. J&S violated the WW Permit, Effluent and Monitoring Requirements, Page 2, ¶ 1, Water Code §§ 7.101 and 26.121(a)(1) by exceeding the single grab limit of 60 mg/l for TSS at the Facility. Specifically, PCS investigations documented at the effluent exceeded the 60 mg/l grab limit for TSS on two occasions. This constitutes a total of two days of violation. Harris County is seeking civil penalties for violations that occurred prior to September 1, 2017.

D. CBOD Violations

8.4. J&S violated the WW Permit, Effluent and Monitoring Requirements, Page 2, ¶ 1, Water Code §§ 7.101 and 26.121(a)(1) by exceeding the single grab limit of 35 mg/l for CBOD at the Facility. Specifically, PCS investigations documented at the effluent exceeded the 35 mg/l grab limit for CBOD on two occasions. This constitutes a total of two days of violation. Harris County is seeking civil penalties for violations that occurred prior to September 1, 2017.

E. Chlorine Violations

8.5. J&S violated the WW Permit, Effluent and Monitoring Requirements, Page 2, ¶ 2, Water Code §§ 7.101 and 26.121(a)(1) by failing to maintain the Facility's effluent chlorine residual between 1.0 and 4.0 mg/l/. Specifically, PCS investigations documented that the chlorine residual in the Facility's effluent was not within the required 1.0 and 4.0 mg/l range on a total of ten different occasions, including a reading of 40.01 on December 11, 2019 and a reading of 0.04 mg/l on the recent December 17, 2019

investigation. This constitutes a total of ten days of violation. Harris County is seeking civil penalties for violations that occurred prior to September 1, 2017.

F. Lift Station Unauthorized Discharge

8.6. J&S Violated Tex. Water Code §§ 7.101 and 26.121 on August 31, 2019 by causing, suffering, allowing, or permitting the discharge of sewage into or adjacent to the water in the state. Specifically, on August 31, 2019, the Facility lift station overflowed into the nearby ditch.

G. Facility Design Criteria Violations

8.7. J&S violated Tex. Water Code § 7.101 and 30 Tex. Admin. Code § 217.325(b) from at least August 31, 2019 to the present by failing to ensure the open wet well at the lift station had a railing capable of preventing an individual from falling into the well and that the wet well was covered with a lid.

H. Facility Access Control Violations

8.8. J&S violated Tex. Water Code § 7.101 and 30 Tex. Admin. Code § 217.328(a)(4) from at least August 31, 2019 to the present by failing ensure the top of the Facility fence had at least three strands of barbed wire.

I. Facility Hazard Sign Violations

8.9. J&S violated Water Code § 7.101 and 30 Tex. Admin. Code § 217.328(b) from at least August 31, 2019 to the present by failing provide a hazard sign on the Facility fence in Spanish.

9. SECOND CLAIM: INJUNCTIVE RELIEF

9.1. As shown above, Defendant J&S Water Company, L.L.C. violated provisions of the Texas Water Code, TPDES Permit No. WQ0012382001, and Commission rules.

9.2. Therefore, Harris County seeks a temporary restraining order and a temporary injunction ordering Defendant J&S Water Company, L.L.C. to comply with of the Texas Water Code, TPDES Permit No. WQ0012382001, and Commission rules at the Facility.

9.3. Harris County requests a temporary restraining order (TRO) against the Defendant J&S Water Company, L.L.C., ordering the Defendant, its agents, officers, directors, servants, and employees, and all other persons who receive actual notice of this Injunction to be enjoined as follows:

- (1) As used in this Temporary Restraining Order, the following words and terms set forth below have the following meanings:
 - a. "ATI" shall mean this Agreed Temporary Injunction.
 - b. "Days" shall mean calendar days.
 - c. "Defendant" or "J&S" shall mean J&S Water Company, L.L.C.;
 - d. "Discharge" or shall mean to deposit, conduct, drain, emit, throw, allow to seep, or otherwise release or dispose.
 - e. "Effective Date" shall mean the date the Court signs this ATI.
 - f. "Effluent" shall mean the liquid that flows out of the Facility into waters in the state at Willow Creek. Effluent samples shall be taken following the final treatment unit.

g. "Facility" shall mean the wastewater treatment plant located approximately 3,300 feet west from the bridge where Rothwood Road crosses Spring Creek in Harris County, Texas 77389;

h. "Plaintiff" or "Harris County" shall mean Harris County, Texas, a political subdivision of the State of Texas.

i. "Wastewater" shall mean wastewater, which originates primarily from kitchen, bathroom, and laundry sources, including waste from food preparation, dishwashing, garbage grinding, toilets, baths, showers, and sinks of a residential dwelling.

j. "WW Permit" shall mean the Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0012382001.

(2) Immediately upon the Effective Date of this TRO, and continuously thereafter, Defendant J&S Water Company, L.L.C shall ensure the Facility Effluent maintains a chlorine residual of at least 1.0 mg/L and does not exceed a chlorine residual of 4.0 mg/l, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.

(3) Immediately upon the Effective Date of this TRO, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall ensure the Facility Effluent does not exceed 15 mg/l Ammonia Nitrogen, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.

- (4) Immediately upon the Effective Date of this TRO, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall ensure the Facility Effluent does not exceed 200 mpn/100ml *E. coli*, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.
- (5) Immediately upon the Effective Date of this TRO, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall not Discharge Wastewater from the Facility unless the Facility Effluent has: (1) less than 200 mpn/100ml *E. coli*, as determined by a grab sample (2) less than 15 mg/l Ammonia Nitrogen, as determined by grab sample and (3) a chlorine residual of 1.0 mg/L to 4.0 mg/l, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.
- (6) Defendant J&S Water Company, L.L.C. shall notify Harris County, in writing, of any Discharge of Wastewater from its WWTP that exceeds a discharge or monitoring requirement in Permit No. WQ0012382001, Effluent Limitations and Monitoring Requirements, Page 2, Numbers 1-4, as soon as possible, but no later than 24 hours of the exceedance.
- (7) Notifications to be submitted to the Harris County shall be submitted to:

Compliance Coordinator – Water and Solid Waste
Harris County Pollution Control Services Department
101 South Richey, Suite H
Pasadena, Texas 77506

and

Harris County and the State of Texas v. J&S Water Company, L.L.C.
Harris County's Original Petition and Application for Temporary Restraining
Order and Temporary and Permanent Injunctive Relief
CA#19ENV0355

Sarah Jane Utley
Managing Attorney
Environmental Practice Group
Harris County Attorney's Office
1019 Congress, 15th Floor
Houston, Texas 77002

9.4. Harris County also seeks a temporary injunction against the Defendant J&S Water Company, L.L.C. ordering the Defendant, its agents, officers, directors, servants, and employees, and all other persons who receive actual notice of the Injunction to be enjoined as follows:

- (1) As used in this Injunction, the following words and terms set forth below have the following meanings:
 - a. "Days" shall mean calendar days.
 - b. "Defendant" or "J&S" shall mean J&S Water Company, L.L.C.;
 - c. "Discharge" or shall mean to deposit, conduct, drain, emit, throw, allow to seep, or otherwise release or dispose.
 - d. "Effective Date" shall mean the date the Court signs this Injunction.
 - e. "Effluent" shall mean the liquid that flows out of the Facility into waters in the state at Willow Creek. Effluent samples shall be taken following the final treatment unit.
 - f. "Facility" shall mean the wastewater treatment plant located approximately 3,300 feet west from the bridge where Rothwood Road crosses Spring Creek in Harris County, Texas 77389;

g. "Plaintiff" or "Harris County" shall mean Harris County, Texas, a political subdivision of the State of Texas.

h. "Wastewater" shall mean wastewater, which originates primarily from kitchen, bathroom, and laundry sources, including waste from food preparation, dishwashing, garbage grinding, toilets, baths, showers, and sinks of a residential dwelling.

i. "WW Permit" shall mean the Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0012382001.

- (2) Immediately upon the Effective Date of this Injunction, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall ensure the Facility Effluent maintains a chlorine residual of at least 1.0 mg/L and does not exceed a chlorine residual of 4.0 mg/l, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.
- (3) Immediately upon the Effective Date of this Injunction, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall ensure the Facility Effluent does not exceed 15 mg/l Ammonia Nitrogen, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.
- (4) Immediately upon the Effective Date of this Injunction, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall ensure the Facility Effluent does not exceed 200 mpn/100ml *E. coli*, as determined

by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.

- (5) Immediately upon the Effective Date of this Injunction, and continuously thereafter, Defendant J&S Water Company, L.L.C. shall not Discharge Wastewater from the Facility unless the Facility Effluent has: (1) less than 200 mpn/100ml *E. coli*, as determined by a grab sample (2) less than 15 mg/l Ammonia Nitrogen, as determined by grab sample and (3) a chorine residual of 1.0 mg/L to 4.0 mg/l, as determined by a grab sample. Effluent monitoring samples shall be taken following the final treatment unit.
- (6) Defendant J&S Water Company, L.L.C. shall notify Harris County, in writing, of any Discharge of Wastewater from its WWTP that exceeds a discharge or monitoring requirement in Permit No. WQ0012382001, Effluent Limitations and Monitoring Requirements, Page 2, Numbers 1-4, as soon as possible, but no later than 24 hours of the exceedance.
- (7) No later than 30 Days after the Effective Date of this Injunction, Defendant J&S Water Company, L.L.C. shall install a cover or lid on the Facility lift station wet well or install railing capable of preventing an individual from falling into the well as required by 30 Tex. Admin. Code § 217.325(b).
- (8) No later than 30 Days after the Effective Date of this Injunction, Defendant J&S Water Company, L.L.C. shall install and continuously

thereafter maintain at least three strands of barbed wire at the top of the Facility fence as required by 30 Tex. Admin. Code § 217.328(a)(4).

- (9) No later than 30 Days after the Effective Date of this Injunction, Defendant J&S Water Company, L.L.C. shall install a hazard sign on the Facility fence in Spanish as required by 30 Tex. Admin. Code § 217.328(b), attached as Exhibit C.
- (10) No later than 30 days after the Effective Date of this Injunction and every 30 Days thereafter, J&S Water Company, L.L.C. shall prepare and submit to Harris County, a written Status Report for each requirement of the injunctive provisions of the Injunction. The Status Report shall describe: (1) the work performed in the two-week period immediately past, (2) the work expected to be performed in the current two-week period, along with a schedule for such work; and (3) the expected dates of completion of each task required in the injunctive provisions. If no work had been performed at the Facility, the Status Report shall state that no work has been performed and provide an explanation as to why no progress was made towards compliance with the injunctive provisions.
- (11) Notifications to be submitted to the Harris County shall be submitted to:

Compliance Coordinator – Water and Solid Waste
Harris County Pollution Control Services Department
101 South Richey, Suite H
Pasadena, Texas 77506

and

Sarah Jane Utley

Managing Attorney
Environmental Practice Group
Harris County Attorney's Office
1019 Congress, 15th Floor
Houston, Texas 77002

9.5. Harris County requests any additional or alternative injunctive relief deemed appropriate by the Court.

9.6. Upon final trial, Harris County requests that this Court make the temporary injunction against Defendant permanent.

10. THIRD CLAIM: CIVIL PENALTIES

10.1. As detailed in Section 9 of this Petition, Defendant J&S Water Company has committed multiple violations falling under the penalty provisions of Tex. Water Code § 7.102.

10.2. For all violation that occur prior to September 1, 2017, Harris County requests that the Defendant be assessed civil penalty between \$50 and \$25,000 for each day and act of violation of the Water Code, the WW Permit and Commission Rules. Tex. Water Code § 7.102.

10.3. Each day of a continuing violation is a separate violation. *Id.*

10.4. Harris County is not seeking any civil penalties that occur on or after September 1, 2017 in this Original Petition.

11. ATTORNEY'S FEES AND COSTS

11.1. Pursuant to the Water Code § 7.108, Harris County asks this Court to award Harris County its reasonable attorney's fees and costs of court incurred in relation to this proceeding.

PRAYER

Harris County and the State of Texas v. J&S Water Company, L.L.C.
Harris County's Original Petition and Application for Temporary Restraining
Order and Temporary and Permanent Injunctive Relief
CA#19ENV0355

Harris County, Texas prays for judgment against J&S Water Company, L.L.C. as follows:

1. That the Defendant be cited to appear and answer herein;
2. That the Court, after notice to the Defendant, conduct a hearing on Harris County's application for a temporary restraining order;
3. That the Court issue a show cause order requiring Defendant to appear before the Court to show who it should not be enjoined from further violations of the laws of the State of Texas;
4. That upon notice and hearing, a temporary injunction be granted against Defendant as requested above;
5. That upon final trial of this cause, permanent injunctive relief be granted against Defendant as requested above;
6. That upon final trial of this cause, Harris County shall have a money judgment against Defendant for attorney's fees and all of its court costs in this action, plus interest at the legal rate from the date of judgment until fully paid; and
7. That upon final trial of this cause, Harris County be granted all other relief, general or special, at law and in equity, to which it may show itself justly entitled.

Respectfully Submitted,

VINCE RYAN
Harris County Attorney



Sarah Jane Utley
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State Bar No. 24042075

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**ATTORNEYS FOR PLAINTIFF
HARRIS COUNTY, TEXAS**



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 December 20, 2019

Certified Document Number: 88634242 Total Pages: 22

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 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