

CAUSE NO. 2022 68763

HOUSTON SECURED DEVELOPMENT PARTNERS, LLC	§ § §	IN THE DISTRICT COURT OF
V.	§ §	HARRIS COUNTY, TEXAS
HSDP BAM, LLC and JOSEPH JACKSON	§ §	151st JUDICIAL DISTRICT

### TEMPORARY INJUNCTION

1. After considering Plaintiff HOUSTON SECURED DEVELOPMENT PARTNERS, LLC's Application for Temporary Injunction, the pleadings, evidence, and arguments of counsel, the Court finds that a Plaintiff has a cause of action against Defendants, has a probable right on final trial to relief sought, and faces probable, imminent, and irreparable injury in the interim should the Court not grant the Temporary Injunction.

By this order, the Court hereby Orders the following:

- a. Defendants must protect and preserve all assets of Houston Secured Development Partners, LLC ("HSDP"), including any and all written and electronic versions of all company records, correspondence, emails, text messages, computers, computer hard drives and relevant evidence related to the Management of HSDP, HSDP Management, LLC, and Baylor Asset Management, LLC from June 1, 2016 to the present
- b. Defendants must deliver originals or copies of all HSDP financial records to the office of Mary Alice Parsons, 4545 Bissonnet St., Suite 104, Bellaire, Texas 77401 within 5 days of the date of this order, to include at a minimum:
  - Copies of all loan agreements or liens associated with properties currently owned by HSDP or Kilgore Commons LLC
  - All deeds to properties currently owned by HSDP or Kilgore Commons LLC
  - All records of bank accounts that hold assets owned by HSDP or Kilgore Commons LLC
  - Any and all records, including electronic records, of HSDP, HSDP Management, LLC, or Kilgore Commons LLC, including corporate minutes or resolutions and complete financial records for the past five (5) years
  - Any and all contracts or agreements with any vendor or supplier used to provide labor or materials to any properties currently owned by HSDP or

Kilgore Commons LLC, including Baylor Asset Management, LLC and any of its subcontractors, as well as invoices, purchase orders, or pay applications received from any of them, and records of any payment issued to any of them during the past five (5) years.

- Any and all permits, permit applications, inspection records, or other documents pertaining to the ongoing development of any properties currently owned by HSDP or Kilgore Commons LLC
- Documentation to support each and every payment made by HSDP to Baylor Asset Management, LLC, including electronic funds transfers, telephone transfers, checks written, or cash payments made.

- c. Defendants must refrain from transferring, withdrawing, or spending any funds out of any bank account that holds HSDP assets so that an adequate accounting can be made and to avoid further self-dealing, without the express approval of DMI Securities, LLC or order of the Court.
- d. Defendants must refrain from from transferring, withdrawing, or spending any funds out of any bank account that holds Kilgore Commons LLC assets so that an adequate accounting can be made and to avoid further self-dealing, without the express approval of DMI Securities, LLC or order of the Court.
- e. Defendants must refrain from transferring, withdrawing, or spending any funds out of any bank account that holds Baylor Asset Management, LLC assets so that an adequate accounting can be made and to avoid further self-dealing, without the express approval of DMI Securities, LLC or order of the Court.
- f. Defendants must refrain from transferring, withdrawing, or spending any funds out of any bank account that holds HSDP BAM, LLC assets so that an adequate accounting can be made and to avoid further self-dealing, without the express approval of DMI Securities, LLC or order of the Court.
- g. Defendants must refrain from further collateralizing any HSDP Property in any way, including but not limited to pledging, assigning, or committing any HSDP Property to any lender as collateral for any new loan or extension or renewal of any existing loan, without the express approval of DMI Securities, LLC or order of the Court. "HSDP Property" includes the following:
  - 3237 Dixie
  - 3235 Dixie
  - 3327 Natchez
  - 3305 Kelton
  - 3307 Kelton
  - 3309 Kelton A
  - 3309 Kelton B

- 3309 Kelton C
  - 3309 Kelton D
  - 3311 Kelton
  - 3303-A Kelton
  - 3303-B Kelton
  - 3303-C Kelton
  - 3303-D Kelton
  - 3303-E Kelton
  - 3303-F Kelton
  - 3303-G Kelton
  - 3303-H Kelton
  - 6315 Bowling Green
  - 6313 Bowling Green
  - 6311 Bowling Green
  - 3321 Kelton
  - 3323 Kelton
- h. Defendants must refrain from selling, transferring, assigning, pledging, or conveying (by way of deed or otherwise) any HSDP Property without the express approval of DMI Securities, LLC or order of the Court.
- i. Defendants must refrain from further collateralizing any Kilgore Commons LLC property in any way, including but not limited to pledging, assigning, or committing any Kilgore Commons LLC property to any lender as collateral for any new loan or extension or renewal of any existing loan, without the express approval of DMI Securities, LLC or order of the Court.

The Court finds that the TRO bond set at \$500.00 is sufficient.

ENTERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

---

PRESIDING JUDGE

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Shanna McClain on behalf of Mary Alice Parsons  
Bar No. 00791409  
shanna@parsonslawtexas.com  
Envelope ID: 70482625  
Status as of 11/28/2022 2:16 PM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mary AliceParsons		mary@parsonslawtexas.com	11/28/2022 1:45:49 PM	SENT
Shanna HillMcClain		shanna@parsonslawtexas.com	11/28/2022 1:45:49 PM	SENT
Warren Muhammad	7089500	warren@wfmlawfirm.com	11/28/2022 1:45:49 PM	ERROR