

CAUSE NO. 2024-28324

ANGEL WHITE, INDIVIDUALLY AND § IN THE DISTRICT COURT OF
AS TRUSTEE OF NAGRA TRUST §
§
v. § HARRIS COUNTY, TEXAS
§
HOANG NGUYEN AND CARDINAL §
FINANCIAL COMPANY, LP § 269th JUDICIAL DISTRICT

PLAINTIFFS’ AMENDED APPLICATION FOR INJUNCTIVE RELIEF

TO THE HONORABLE JUDGE CORY DON SEPPOLIO:

Angel White, Individually and as Trustee of Nagra Trust (“Plaintiffs” or “White” herein), hereby files their Amended Application for Injunctive Relief against Hoang Nguyen (“Nguyen”) and Cardinal Financial Company, LP, (“Cardinal”), collectively (“Defendants” herein) and would respectfully show the Court as follows:

CLAIMS

1. To the extent not inconsistent herewith, Plaintiffs incorporate by reference the allegations made in paragraph 1 through paragraph 37 of Plaintiffs’ Original Petition which was filed on May 2, 2024 as if set forth fully herein.
2. Unless Defendants are enjoined, Plaintiffs will suffer probable harm which is imminent and irreparable. More specifically, if not enjoined, Defendants may sell the Property at any time during the pendency of this matter thus depriving Plaintiffs of ownership of the Property and potentially causing Plaintiffs to be dispossessed of the Property. Plaintiffs have no adequate remedy at law because the subject matter is real property, and any legal remedy of which Plaintiffs may avail themselves will not give them as complete, equal, adequate, and final a remedy as the injunctive relief sought in this Application.

3. Therefore, Plaintiffs request that this Court issue a Temporary Injunction to enjoin Defendants from selling the real property which is the subject matter of this lawsuit and is commonly known as 11819 Nagra Drive, Houston, TX 77065 during the pendency of this lawsuit.

4. Plaintiffs further request that, upon trial on the merits, Defendants be permanently enjoined from the same acts listed in Paragraph 3 above.

5. Plaintiffs are likely to prevail on the merits of the lawsuit as described above.

6. The granting of the relief requested is not inconsistent with public policy considerations.

BOND

7. Plaintiffs are willing to post a reasonable temporary injunction bond and requests that the Court set such bond.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that:

- A. The Court conduct a hearing on Plaintiffs' Amended Application for Injunctive Relief;
- B. A temporary injunction be issued restraining Defendants, their agents, employees, and legal counsel, and those acting in concert or participation with Defendants who receive actual notice of the Order, by personal service or otherwise, from selling the real property which is the subject matter of this lawsuit and is commonly known as 11819 Nagra Drive, Houston, TX 77065 during the pendency of this lawsuit; and
- C. A Permanent Injunction be entered enjoining Defendants from the same acts listed in Paragraph B above, and such other and further relief, both general and special,

at law or in equity, to which Plaintiffs may be entitled

Respectfully submitted,

VILT LAW, P.C.

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been served by e-serve upon the following on June 18, 2024 pursuant to the Texas Rules of Civil Procedure:

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/s/ Robert C. Vilt
ROBERT C. VILT

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.

Nicolas Vilt on behalf of Robert Vilt

Bar No. 788586

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Filing Description: Amended Application for Injunctive Relief

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