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FILED
Marilyn Burgess
District Clerk
Time: **OCT - 1 2024**
By: *[Signature]*
Harris County, Texas
Deputy

CAUSE NO. 202467285

**IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS
189TH DISTRICT COURT**

PLENTY MORGAN GERMANY III, Plaintiff,
vs.
**PINNACLE REALTY ADVISORS INC. dba PINNACLE MORTGAGE and RELATIVE
LENDING, Defendants.**

Ex Parte

**TEMPORARY RESTRAINING ORDER AND ORDER SETTING HEARING
FOR TEMPORARY INJUNCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Plenty Morgan Germany III, respectfully requests the issuance of a Temporary Restraining Order (TRO) to enjoin Defendants, Pinnacle Realty Advisors Inc. dba Pinnacle Mortgage and Relative Lending (collectively "Defendants"), from proceeding with the foreclosure sale of Plaintiff's primary residence and ministry property located at 6610 Tierwester St, Houston, TX 77021.

After reviewing the application and considering the urgency of the matter, the Court finds the following:

1. Irreparable Harm to Plaintiff and Ministry

Without immediate judicial intervention, Defendants will proceed with the foreclosure of Plaintiff's residence on **October 1, 2024**, resulting in irreparable harm to **both Plaintiff and the Reset and Align Ministry**, a faith-based organization serving the Houston community. This harm would disrupt the ministry's mission and cause damage that cannot be adequately compensated by money.

2. Violation of Texas Property Code and Equity Principles

Defendants did not provide the legally required **21-day notice** under **Texas Property Code §51.002** after Plaintiff's **Chapter 13 bankruptcy** was dismissed on **September 13, 2024**. Further, Defendants' actions violate the equity protections designed to ensure due process for consumers, especially during foreclosure proceedings.

3. Consumer Protection and Legal Rights

As a **consumer**, Plaintiff is entitled to protections under federal bankruptcy law and state foreclosure statutes. Defendants' failure to provide proper notice breaches these rights, violating **Page 1 of 2**

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging.

Texas consumer protection laws and federal bankruptcy protections.

ORDER

IT IS HEREBY ORDERED that Defendants, **Pinnacle Realty Advisors Inc. dba Pinnacle Mortgage and Relative Lending**, and their agents, are temporarily restrained from:

- Proceeding with the foreclosure sale of the property located at **6610 Tierwester St, Houston, TX 77021**, scheduled for **October 1, 2024** or at any other time until further court order.

4. Urgency of the Matter

Due to the imminent foreclosure, an **emergency hearing** is necessary to prevent irreparable harm to both the Plaintiff and the community served by **Reset and Align Ministry**. The Court will hold a hearing on **Plaintiff's Application for a Temporary Injunction** on 10/14/24 at 330p (time), in **189th District Court, Harris County, Texas**.

5. Waiver of Bond Requirement

Plaintiff is ~~not~~ required to post a bond for this Temporary Restraining Order ^{of \$700.00} ~~due to financial hardship and equity considerations under the Texas Rules of Civil Procedure.~~

Signed this ____ day of _____, 2024.

Signed: _____
10/1/2024
[Judge's Name] 10:00 AM
Judge, 189th District Court
Harris County, Texas