

IN THE COURT OF ____ JUDICIAL DISTRICT OF DALLAS COUNTY, TEXAS

MICHAEL A. STUART,	§	
PLAINTIFF,	§	
	§	DC-25-10952
v.	§	CAUSE NO.: _____
	§	
BROOKFIELD PROPERTIES,	§	
2121 North Pearl Street, 12th Floor,	§	
Dallas, TX 75201,	§	
	§	
and	§	
§		
BILT TECHNOLOGIES, INC.,	§	
1000 Nolen Drive, Suite 400,	§	
Grapevine, TX 76051,	§	
§		
DEFENDANTS.	§	

MOTION TO DEPOSIT DISPUTED AMOUNT WITH COURT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Michael A. Stuart, Plaintiff, proceeding pro se, and respectfully moves this Court to allow Plaintiff to deposit the disputed charges with the Court pending resolution of this matter, and in support thereof would show:

I. BACKGROUND

1. Plaintiff has filed this action seeking declaratory judgment and emergency relief regarding systematic violations of federal Section 8 Housing Choice Voucher contract requirements by Defendants.

2. Defendants' automated billing system has generated erroneous charges exceeding Plaintiff's federally mandated payment obligation, attempted unauthorized electronic withdrawals from Plaintiff's bank account, and issued false notices to vacate despite receipt of government housing assistance payments.
3. Plaintiff's monthly obligation under the federal Housing Assistance Payment (HAP) contract is approximately \$400 (\$333 tenant portion plus approximately \$50 utilities), as determined by Dallas County Housing Authority.

II. MOTION TO DEPOSIT FUNDS

4. To demonstrate good faith, remove any question regarding Plaintiff's payment capability, and ensure legitimate obligations are satisfied pending resolution of this dispute, Plaintiff respectfully moves this Court to accept deposit of \$1000 representing the disputed charges.
5. This deposit demonstrates that Plaintiff's dispute concerns Defendants' systematic violations of federal housing contracts and deployment of malfunctioning automated billing systems, not avoidance of legitimate payment obligations.
6. Plaintiff is a decorated United States Air Force veteran with perfect payment history and excellent credit (785 score), and has financial means to satisfy legitimate obligations while seeking judicial protection from corporate system abuse.

III. LEGAL BASIS

7. Texas courts have authority to hold disputed funds pending resolution of contract disputes, particularly where such deposits demonstrate good faith and protect the interests of all parties.
8. Escrow of disputed amounts is standard practice in landlord-tenant disputes involving billing discrepancies and federal contract interpretation.
9. This deposit will remove any argument regarding payment capability and allow the Court to focus on the substantive issues of federal contract compliance and corporate accountability.

IV. PUBLIC INTEREST

10. Plaintiff brings this action not merely for individual relief but to protect other vulnerable veterans and disabled tenants who lack the resources or expertise to challenge systematic corporate violations of federal housing assistance programs.
11. The deposit demonstrates Plaintiff's principled motivation to establish precedent protecting federal housing program participants from corporate abuse, rather than seeking to avoid legitimate financial obligations.

V. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

- A. ACCEPT DEPOSIT of \$1000 by money order to be held by the Court pending final resolution of this matter;
- B. ORDER that acceptance of this deposit does not constitute admission of liability for the amount deposited or waiver of Plaintiff's claims regarding federal contract violations;
- C. ESTABLISH that the deposited funds shall be disbursed only upon final resolution of this case or further order of this Court;
- D. CONFIRM that this deposit satisfies any argument regarding Plaintiff's payment obligations during the pendency of this litigation; and
- E. GRANT such other relief as the Court deems just and proper.

Respectfully submitted,

Dated: July 13, 2025

/s/ Michael Stuart

Michael Stuart (Pro Se)

1800 Main Street, Apt 1554

Dallas, TX 75201

Phone: (361) 446-5392

Email: michaelalanstuart@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Motion will be served upon all parties in accordance with the Texas Rules of Civil Procedure.

/s/ Michael Stuart
Michael Stuart (Pro Se)

VERIFICATION

I, Michael A. Stuart, declare under penalty of perjury that the facts stated in this Motion are true and correct to the best of my knowledge and belief.

/s/ Michael Stuart
Michael Stuart (Pro Se)

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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