

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

MICHAEL A. STUART,	§	
PLAINTIFF,	§	
	§	
v.	§	DC-25-10952
	§	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.	§	

TEMPORARY RESTRAINING ORDER

On this ____ day of _____, 2025, came on to be considered Plaintiff's Application for Temporary Restraining Order. Having considered the pleadings, evidence, and arguments presented, the Court finds:

FINDINGS

1. **Jurisdiction and Venue:** The Court has jurisdiction over the parties and subject matter. Venue is proper in Dallas County, Texas.

2. **Immediate and Irreparable Harm:** Plaintiff faces immediate and irreparable harm, including potential loss of housing, financial injury, and damage to credit, for which there is no adequate remedy at law.
 3. **Likelihood of Success:** Plaintiff has demonstrated a probable right to the relief requested, based on Defendants' repeated billing system errors, improper collection activities, and violations of federal Section 8 Housing Choice Voucher requirements, as supported by evidence and government agency documentation.
 4. **Public Interest:** The public interest is served by protecting the rights of Section 8 tenants and enforcing compliance with federal housing laws.
 5. **No Bond Required:** Good cause exists to waive bond, given the circumstances and government agency support.
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IT IS ORDERED THAT Defendants BROOKFIELD PROPERTIES and BILT TECHNOLOGIES, INC., their officers, agents, employees, attorneys, and those acting in concert with them who receive actual notice of this Order, are immediately RESTRAINED and ENJOINED from:

A. Eviction and Collection Actions

1. Proceeding with any eviction actions, notices to vacate, or dispossessory proceedings against Plaintiff based on disputed billing amounts or while government Housing Assistance Payments are current;
2. Engaging in any collection activities or communications seeking amounts beyond Plaintiff's designated tenant portion and approved utilities (approximately \$400 per month);
3. Reporting any disputed amounts or alleged arrearages to credit bureaus or third-party debt collectors;
4. Charging or collecting any additional fees, penalties, or unauthorized charges related to disputed billing errors.

B. Electronic Funds Access

5. Attempting any electronic withdrawals, automatic debits, or other access to Plaintiff's bank accounts without written authorization that specifies the amount and legal basis for each charge;
6. Processing any payment request that exceeds Plaintiff's monthly obligation as determined by the Dallas County Housing Authority.

C. Payment System Requirements

7. Requiring Plaintiff to use the BILT payment system, or any other payment system, while it continues to generate incorrect charges or amounts in excess of the actual tenant portion and approved utilities;
8. Generating or issuing automated notices, fees, or charges through any billing system known to be malfunctioning for Plaintiff's account.

D. Affirmative Requirements

9. Defendants shall, within 48 hours of service of this Order, designate a corporate representative with authority to respond to government housing agency inquiries and provide direct contact information to Dallas County Housing Authority and the Veterans Administration;
10. Defendants shall respond to all government agency inquiries regarding Plaintiff's lease and account status within 48 hours of receipt;
11. Defendants shall provide Plaintiff with clear, accurate monthly billing statements showing:
 - Tenant portion owed (\$333)
 - Utilities (approximately \$50)
 - Government HAP payment received
 - Any other charges with their legal basis;
12. Defendants shall confirm in writing Plaintiff's current account status and lease standing.

E. Payment Method Compliance

13. Defendants shall provide Plaintiff with a functional and accurate method for making payments that does not generate incorrect or excess charges. Until such method is operational, Defendants shall accept payment by other means in compliance with federal Section 8 requirements.

ENFORCEMENT AND DURATION

14. This Temporary Restraining Order shall remain in effect until _____, 2025, at _____ .m., or until further order of this Court.
15. Violation of this Order may result in contempt of court and imposition of monetary sanctions.
16. The Clerk is directed to issue citation and serve this Order upon Defendants by the most expeditious means available, including personal service, certified mail, or email.
17. A hearing on Plaintiff's Application for Temporary Injunction is set for _____, 2025, at _____ .m., in Courtroom _____ of this Court, at which Defendants may appear and be heard.

IT IS FURTHER ORDERED that the Clerk of this Court shall issue citation and have the same served upon Defendants in the manner provided by law.

SIGNED this _____ day of _____, 2025.

JUDGE PRESIDING

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Order was served upon all parties of record in accordance with the Texas Rules of Civil Procedure on _____, 2025.

Clerk of the Court

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.

Envelope ID: 103103373

Filing Code Description: Original Petition

Filing Description: Original Petition???Declaratory and Injunctive Relief re:
Section 8 Lease Dispute

Status as of 7/14/2025 3:38 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Michael AStuart		michaelalanstuart@hotmail.com	7/14/2025 3:02:22 PM	SENT