

**CAUSE NO. DC-25-10952**

**§ IN THE 101ST JUDICIAL DISTRICT § COURT OF § § § DALLAS COUNTY,  
TEXAS**

**MICHAEL A. STUART**, Plaintiff,

v.

**BROOKFIELD PROPERTIES, et al.**, Defendants.

**PLAINTIFF'S MOTION FOR SANCTIONS FOR FAILURE TO COMPLY WITH COURT  
ORDER**

**TO THE HONORABLE JUDGE STACI WILLIAMS:**

COMES NOW, Plaintiff Michael A. Stuart, proceeding *pro se*, and files this Motion for Sanctions against Defendant Brookfield Properties Multifamily, LLC ("Defendant") pursuant to Texas Rule of Civil Procedure 215.2 for its willful and intentional defiance of this Court's February 5, 2026 Order Compelling Production of Electronic Records. In support thereof, Plaintiff respectfully shows the Court as follows:

**I. FACTUAL AND PROCEDURAL BACKGROUND**

1. On February 5, 2026, this Court held a hearing on Plaintiff's Motion to Compel Discovery [Sources 738, 739].
2. After considering the arguments, the Court granted the Motion and explicitly ordered Defendant Brookfield Properties to produce the following specific evidence regarding Plaintiff's account (Unit 1554):
  - *The complete, native electronic transaction logs, audit trails, and user activity logs generated by the BILT platform.*
  - *Timeframe: January 1, 2023, through the Present.*
  - *Format: Native electronic format (e.g., .CSV, .XLS) with metadata intact .*
3. The Court's Order established a strict and unambiguous deadline: Defendant was commanded to produce these materials to Plaintiff **no later than 5:00 p.m. on Thursday, February 12, 2026 .**
4. Defendant brazenly ignored this Court's Order. The February 12, 2026 deadline has long passed, and Defendant has failed to produce the native electronic transaction logs, audit trails, or metadata as commanded by the Court.

## II. ARGUMENT AND LEGAL AUTHORITY

1. **Texas Rule of Civil Procedure 215.2(b)** provides that if a party fails to comply with an order compelling discovery, the Court may impose severe sanctions.
2. Defendant's refusal to produce these native audit logs is not an oversight; it is a calculated cover-up. As Plaintiff has repeatedly shown the Court, Defendant claims the sudden appearance of a \$2,475.45 debt on Plaintiff's ledger was the result of a "system error" . However, the withheld BILT native audit logs contain the metadata proving that a human employee manually reversed a valid \$1,312 credit and backdated false late fees after Plaintiff filed this lawsuit .
3. Defendant is actively defying a direct Court Order because complying with it would furnish the undeniable proof of Defendant's ledger manipulation, perjury, and retaliatory practices.
4. Plaintiff is severely prejudiced by this defiance. Defendant is weaponizing the withheld data to maintain a fraudulent \$6,266.38 balance against a disabled HUD-VASH veteran , while simultaneously depriving Plaintiff of the exact court-ordered evidence required to prove the fraud at the upcoming trial.

## III. RELIEF REQUESTED

1. Because Defendant has shown willful disregard for this Court's authority and the discovery process, Plaintiff requests the Court impose sanctions proportionate to the offense under Rule 215.2(b).
2. Specifically, Plaintiff requests the Court enter an Order:
  - **(a) Striking Defendant's Defenses:** Striking Defendant's pleadings and defenses pertaining to the validity of the alleged ledger debt, as Defendant has refused to produce the court-ordered evidence regarding its creation.
  - **(b) Establishing Facts:** Ordering that the facts regarding the July 24, 2025 ledger alterations be taken as established in Plaintiff's favor—specifically, that Defendant manually and retroactively fabricated the debt in bad faith.
  - **(c) Default Judgment:** In the alternative, rendering a default judgment against Defendant for its contempt of this Court's February 5, 2026 Order.
  - **(d) Monetary Sanctions:** Awarding Plaintiff all costs incurred in seeking this enforcement and compelling Defendant to immediately turn over the records.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that the Court grant this Motion for Sanctions, impose the requested penalties against Defendant for its failure to comply with the Court's February 5, 2026 Order, and grant Plaintiff all such other and further relief to which he may be justly entitled.

Respectfully submitted,

**/s/ Michael A. Stuart**

Michael A. Stuart, Plaintiff Pro Se 3672 Encanto Dr Fort Worth, Texas 76109 (361) 446-5392  
[michaelalanstuart@hotmail.com](mailto:michaelalanstuart@hotmail.com)

**CERTIFICATE OF CONFERENCE** I certify that on this date, I attempted to confer with Defendant's counsel of record, Robert L. Eden and Marlene D. Thomson, regarding their failure to comply with the Court's February 5, 2026 Order. No resolution could be reached as Defendant continues to withhold the ordered production.

**/s/ Michael A. Stuart**

**CERTIFICATE OF SERVICE** I certify that a true and correct copy of this Motion was served on Defendant's counsel of record via the Texas e-filing system on March 9, 2026.

**/s/ Michael A. Stuart**