

Cause No. D-1-GN-25-003457

STATE OF TEXAS,
Plaintiff,

v.

TRAVIS COUNTY, TEXAS,
Defendant.

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IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

459TH JUDICIAL DISTRICT

**STATE OF TEXAS'S MOTION TO STRIKE GRAHAM DEVELOPMENT
CORPORATION AND MOO MOO MEADOWS, LLC'S PETITION IN
INTERVENTION**

The State of Texas ("State"), by and through its Attorney General, on behalf of the Texas Commission on Environmental Quality ("TCEQ"), respectfully requests this Court strike Graham Development Corporation and Moo Moo Meadows, LLC's (together, "Intervenor Companies") Petition in Intervention. The State brings three statutorily authorized claims against Travis County, Texas ("County") reserved exclusively for the State in this matter that the Intervenor Companies have no justiciable interest in: (1) civil penalties, (2) injunctive relief for violations of state law, and (3) attorney's fees. Because the Intervenor Companies could never bring any of these statutory claims in their own name, their Petition in Intervention must be struck. Moreover, allowing intervention will unnecessarily complicate the issues and is not necessary to protect the Intervenor Companies' interests.

I. BACKGROUND

1. This is a statutorily-authorized environmental enforcement action filed by the State against the County concerning its closed landfill to enforce Texas statutes and rules designed to prevent pollution and control the quality of water in the State. The State seeks civil penalties against the County for each day of each violation of state law. *See* Tex. Water Code § 7.102 (civil penalties shall be assessed not less than \$50 nor greater than \$25,000 for each day of each violation as the court

or jury considers proper); *see also id.* § 7.105(a) (at the request of TCEQ, the Attorney General shall institute a suit in the name of the state to recover civil penalties).

2. The State further seeks injunctive relief to restrain the County's violations of state law. *See id.* § 7.032(a)–(e) (the State may institute suit for mandatory and prohibitory injunctive relief in district court to restrain violations or threats of violation of statutes, rules, and permits within TCEQ's jurisdiction); *see also id.* § 7.105(a) (at the request of TCEQ, the Attorney General shall institute a suit in the name of the state for injunctive relief). When the State brings suit, and it is determined that a statute is being violated, it is within the province of the district court to restrain it, and a balancing of the equities does not apply. *State v. Tex. Pet Foods, Inc.*, 591 S.W.2d 800, 805 (Tex. 1979). When, as here, there is a statutory source for injunctive relief, the statute's express language supersedes the common law injunctive relief elements such as imminent harm or irreparable injury and lack of an adequate remedy at law. *West v. State*, 212 S.W.3d 513, 519 (Tex. App.—Austin 2006, no pet.).¹

3. Finally, the State seeks statutorily authorized attorney's fees against the County. *See* Tex. Water Code § 7.108 (if the State prevails in a suit under Texas Water Code Chapter 7, Subchapter D, it may recover reasonable attorney's fees). Under the American rule, which governs Texas, a party may only be awarded attorney's fees when authorized by statute or contract. *Robrmoos Venture v. UTSW DVA Healthcare, LLP*, 578 S.W.3d 469, 484 (Tex. 2019).

4. This lawsuit concerns violations of state law at the County's closed, permitted Type I landfill ("Landfill") located at 9500 E. Highway 290, Austin, Texas, northwest of the intersection of U.S. Highway 290 and Giles Road. The County operated the Landfill from 1968 until 1982, at which

¹ Where the facts conclusively show a party is violating the substantive law, it becomes the duty of the court to enjoin the violation, and in such case, there is no discretion to be exercised. *Kubala Pub. Adjusters, Inc. v. Unauthorized Prac. of L. Comm.*, 133 S.W.3d 790, 795 (Tex.App.—Texarkana 2004, no pet.); *Health Enrichment & Longevity Inst., Inc. v. State*, No. 03-03-00578-CV, 2004 WL 1572935, at *5 (Tex.App.—Austin July 15, 2004, no pet.) (mem. op.); *Crain v. Unauthorized Prac. of L. Comm.*, 11 S.W.3d 328, 332 (Tex.App.—Houston [1st Dist.] 1999, pet. denied); *Green v. Unauthorized Prac. of L. Comm.*, 883 S.W.2d 293, 296 (Tex.App.—Dallas 1994, no writ); *Priest v. Tex. Animal Health Comm'n*, 780 S.W.2d 874, 876 (Tex.App.—Dallas 1989, no writ).

point the Landfill was closed and the County began post-closure care. The County has not completed post-closure care or relinquished its landfill permit due to ongoing leachate production from the Landfill. Therefore, the Landfill remains in post-closure care, and the County continues to operate the Landfill under its permit.

5. On March 8, 2024, TCEQ conducted a compliance investigation at the Landfill as part of longstanding compliance and enforcement efforts concerning the Landfill. TCEQ cited the County with failure to conduct adequate post closure care and unauthorized discharges of waste.

6. On December 16, 2024, after granting the County compliance deadline extensions at the County's request, TCEQ investigated the Landfill again and found similar violation.

7. On February 11, 2025, Moo Moo Meadows, LLC sent TCEQ a notice of intent to sue the County in federal court under the citizen suit provisions of the Resource Conservation and Recovery Act. *See* 42 U.S.C. § 6972(a)(1)(B), (b)(2)(C)(i) (if the State proceeds in state court against the County within ninety days of the notice of intent, Moo Moo Meadows, LLC may not proceed with its federal suit against the County concerning its environmental violations claims).

8. On May 13, 2025, to proceed with its existing enforcement and occupy the regulatory space, the State filed the present case against the County ("State's Suit"). The State continues to allege that the County has violated the Texas Water Code, Texas Health and Safety Code, and TCEQ rules adopted thereunder by (1) failing to meet minimum post-closure care requirements for the Landfill; and (2) causing, suffering, allowing, or permitting the unauthorized discharge or threat of discharge of waste into waters in the state.

9. The State seeks statutory remedies under Chapter 361 of the Texas Health and Safety Code and Chapters 7 and 26 of the Texas Water Code. As stated, such remedies include the assessment of civil penalties and mandatory and prohibitory injunctions requiring the County to cease the

discharge of waste, repair the Landfill's leachate collection system, and remediate affected soils, sediments, or water, among other items.

10. On January 16, 2026, Intervenor Companies filed a Petition in Intervention ("Intervention") in the State's Suit. On February 24, 2026, the County filed a Motion to Strike Intervenor Companies' Petition in Intervention.

Intervenor Companies' Relationship with Travis County and the Landfill

11. On or around February 21, 2024, more than forty years after the County began post-closure care, Moo Moo Meadows, LLC took ownership of the property where the Landfill sits ("Property") via special warranty deed from the previous owner, Robertson Family 290 Property, LLC.² On or around September 23, 2025, Robertson Family 290 Property, LLC executed an Assignment of Claims to, in part, grant, convey, and assign all right, title and interest in the Property to both Moo Moo Meadows, LLC and "Graham Development Company (an assumed name of Power Packer, LLC, a Wyoming limited liability company)." Together, the Intervenor Companies hold themselves out as "owner/developer" of the Property. Intervention 17–18, 30.

12. On July 31, 2025, the Intervenor Companies filed suit against the County in the United States District Court for the Western District of Texas ("Federal Suit").³ The Intervenor Companies brought claims against the County for breach of contract, unconstitutional taking, and due process violations. Each of the Intervenor Companies' claims in the Federal Suit were dismissed on March 17, 2026, though the Intervenor Companies were granted leave to file a first amended complaint. The Intervenor Companies have also filed a motion for reconsideration of the dismissal which remains pending.

² The Special Warranty Deed with Vendor's Lien was filed and recorded with the County Clerk of Travis County on February 22, 2024, Instrument No. 2024018638.

³ *Graham Development Corp. & Moo Moo Meadows, LLC v. Travis County, Texas*, No. 1:25-cv-01196-RP (W.D. Tex. July 31, 2025).

13. On December 3, 2025, the County filed a condemnation lawsuit against Moo Moo Meadows, LLC and Robertson Family 290 Property, LLC in Travis County probate court (“Condemnation Suit”).⁴ Graham Development Corporation is not a party to the Condemnation Suit. The County seeks to condemn the Property for purposes including, but not limited to, maintenance and repair of the Landfill. On April 30, 2026, an Award of the Special Commissioners was entered in the Condemnation Suit.

II. ARGUMENT AND AUTHORITIES

14. Texas Rule of Civil Procedure 60 authorizes a party with a justiciable interest in a pending suit to intervene as a matter of right. *In re Union Carbide Corp.*, 273 S.W.3d 152, 154 (Tex. 2008) (per curiam) (orig. proceeding). However, because intervention is allowed as a matter of right, “the ‘justiciable interest’ requirement is of paramount importance.” *Id.* at 155. If any party moves to strike a pleading in intervention, the would-be intervenor has the burden of showing that it has a justiciable interest. *Id.* A court must strike a pleading in intervention if the intervenor has no justiciable interest in the suit. *See id.* at 154–56.

15. To constitute a justiciable interest, “[t]he intervenor’s interest must be such that if the original action had never been commenced, and he had first brought it as the sole plaintiff, he would have been entitled to recover in his own name to the extent at least of a part of the relief sought’ in the original suit. In other words, a party may intervene if the intervenor could have ‘brought the [pending] action, or any part thereof, in his own name.’” *Id.* at 155 (internal citations omitted).

16. Even still, intervention should not be allowed if it will complicate the case by an excessive multiplication of the issues, or if it is not almost essential to protect the intervenor’s interest.

⁴ *Travis County, Texas v. Moo Moo Meadows, LLC & Robertson Family 290 Property, LLC*, No. C-1-CD-25-000071 (Travis Cty. Prob. Ct. No. 1, Tex. Dec. 3, 2025).

Guar. Fed. Savs. Bank v. Horseshoe Operating Co., 793 S.W.2d 652, 657 (Tex. 1990); *Doe v. Carroll*, No. 03-08-00556-CV, 2009 WL 1811002, at *5 (Tex. App.—Austin, June 23, 2009).

A. The Intervenor Companies Have No Justiciable Interest in the State’s Suit

17. The Intervenor Companies cannot meet their burden of showing a justiciable interest in the State’s Suit because they could have never brought any part of the State’s case in their own name. *See In re Union Carbide*, 273 S.W.3d 152, 154–55 (Tex. 2008). The State is the exclusive owner of the three statutory claims it brings in this matter—Texas Water Code sections 7.032, 7.102, and 7.108—and Chapter 7 of the Texas Water Code makes clear that the power to bring claims related to injunctive relief, civil penalties, and attorney’s fees as described therein rests exclusively with the State.

18. By statute, the Texas Legislature has given TCEQ primary responsibility and jurisdiction for implementing and enforcing Texas laws relating to the protection of water quality and disposal of solid waste. Tex. Water Code §§ 5.012, 5.013(a)(3), 5.013(a)(11), 26.011; Tex. Health & Safety Code §§ 361.002(a), 361.011. No person may cause, suffer, allow, or permit a violation of statute within TCEQ’s jurisdiction, or a rule adopted or permit issued thereunder. Tex. Water Code § 7.101.

19. In exercising its enforcement authority to implement the statutes, rules, and permits within its jurisdiction, the Texas Supreme Court has held that “TCEQ is afforded great discretion to evaluate the violation and determine the appropriate penalty or remedy.” *BCCA Appeal Grp., Inc. v. City of Hous.*, 496 S.W.3d 1, 9 (Tex. 2016). It is within TCEQ’s power and expertise to determine the most effective means to achieve compliance with the State’s statutes, regulations, and permits, *see id.* at 9–10, which may include pursuing civil enforcement.

20. The Texas Attorney General is the chief legal officer of the State and thus authorized by law to represent the interests of the State. *See* Tex. Const. art. IV, § 22; Tex. Gov’t Code § 402.021; *Terrasas v. Ramirez*, 829 S.W.2d 712, 721 (Tex. 1991); *Bullock v. Tex. Skating Ass’n*, 583 S.W.2d 888, 894 (Tex. Civ. App.—Austin 1979, writ ref’d n.r.e). As described above, at TCEQ’s request, the Attorney

General may file suit for injunctive relief, civil penalties, or both, to address violations of statutes, rules, or permits within TCEQ's jurisdiction. Tex. Water Code §§ 7.032(e), 7.105(a).

21. As the Intervenor Companies acknowledge, the State's Suit is a statutory enforcement action. Intervention 29. The State, on behalf of TCEQ, is diligently enforcing the State's environmental statutes, rules, and permits by seeking civil penalties and injunctive relief against the County. Again, the Intervenor Companies could not have brought any part of the State's statutory enforcement action against the County on its own behalf as this authority rests exclusively with the State on behalf of TCEQ. Tex. Water Code §§ 5.012, 5.013(a)(3), 5.013(a)(11), 26.011; Tex. Health & Safety Code §§ 361.002(a), 361.011. In fact, the Intervenor Companies could not bring or maintain any enforcement cause of action under the Texas Health and Safety Code or the Texas Water Code because the Texas Legislature has not authorized private parties to do so. Neither the Texas Health and Safety Code nor the Texas Water Code provide any cause of action for landowners or other affected persons to enforce State laws or TCEQ rules or permits related to water quality or waste disposal.

22. Furthermore, the Intervenor Companies would not be able to seek the civil penalties, injunctive relief, or attorney's fees requested in the State's Suit as only the State, on behalf of TCEQ, has this authority. Tex. Water Code §§ 7.032(e), 7.105(a). Neither the Texas Health and Safety Code nor the Texas Water Code allow a private citizen to seek civil penalties or injunctive relief with respect to State laws or TCEQ rules or permits related to water quality or waste disposal. Likewise, the Texas Water Code enables only the State to recover attorney's fees in an enforcement action such as this. *Id.* § 7.108; *see Robrmoos Venture v. UTSW DVA Healthcare, LLP*, 578 S.W.3d 469, 484 (Tex. 2019) (allowing the recovery of attorney's fees only when authorized by statute or contract).

23. The Intervenor Companies also refer to the Resource Conservation and Recovery Act ("RCRA"), a federal statute, as a basis for its purported justiciable interest. 42 U.S.C. § 6901 et. seq.

RCRA allows private parties to commence a civil action *in federal court* for certain alleged waste violations only after providing notice of intent to do so to the State and others. *Id.* § 6972(a)(1)(B), (b)(2)(A). A citizen suit cannot be brought in federal court, though, if the State commences an action in state or federal court to restrain or abate the same acts or conditions detailed in the notice of intent no later than ninety days after receiving the notice. *Id.* § 6972(b)(2)(C). The State brought suit, based in Texas law, against the County in state court to enjoin the conditions detailed in the Intervenor Companies' notice. Thus, under RCRA, the Intervenor Companies are prevented from bringing any similar, federal environmental enforcement claims in their own name related to their notice of intent. Even if such RCRA claims were not barred, they can only be brought in federal court and have no place in this state court case. Thus, RCRA stands to negate, not support, the existence of a justiciable interest in the State's Suit.

24. Ultimately, using the Texas Supreme Court's standard in *Union Carbide*, if the State's Suit had never commenced, the Intervenor Companies would have no right to file the same environmental enforcement action civil penalties or statutory injunctive relief to enforce compliance with state law and TCEQ's rules or permits, nor seek attorney's fees. *See In re Union Carbide Corp.*, 273 S.W.3d at 155. Furthermore, the fact that the State did file its lawsuit means the Intervenor Companies are barred from filing a similar federal RCRA action. Therefore, the Intervenor Companies have no justiciable interest in the State's Suit, and their Intervention must be struck.

B. Intervention Would Complicate the State's Suit by Excessively Multiplying Issues

25. This Court should also strike the Intervention because the intervention will complicate this case by an excessive multiplication of the issues. *See Guar. Fed. Sav. Bank v. Horseshoe Operating Co.*, 793 S.W.2d 652, 657–658 (Tex. 1990); *Doe v. Carroll*, No. 03-08-00556-CV, 2009 WL 1811002, at *5 (Tex. App.—Austin, June 23, 2009). One example of such a complication is the addition of new issues that are completely unrelated to the principal lawsuit. *L. Offs. of Windle Turley, P.C. v. Gbiasinejad*,

109 S.W.3d 68, 70-71 (Tex. App.—Fort Worth 2003, no pet.). The Intervenor Companies have not raised any issues in their Intervention which are not already addressed in either the Intervenor Companies’ Federal Suit or the County’s Condemnation Suit. Thus, intervention would only complicate the State’s Suit by adding new issues that are already being litigated in other forums.

26. The Intervenor Companies rely heavily on the existence of their Federal Suit as justification for intervening in the State’s Suit.⁵ The two lawsuits and their respective issues are incongruous though; the Intervenor Companies’ filing of one case does not support intervention in the other. The Federal Suit stems from the County’s denial of the Intervenor Companies’ development plan before Moo Moo Meadows LLC had an ownership interest in the Property.⁶ The Intervenor Companies’ five causes of action in the Federal Suit—including claims for breach of contract, contract interpretation, and violations of substantive and procedural due process rights—are unrelated to the State’s Suit enforcing landfill and waste management laws and regulations. Raising these claims in the State’s Suit would only introduce new issues that are unrelated to the State’s enforcement case.

27. The Intervenor Companies also reference the County’s Condemnation Suit to support intervention in the State’s Suit. First, Graham Development Corporation is not a party to the Condemnation Suit. Therefore, this is no basis to support Graham Development Corporation’s intervention in the State’s Suit. Second, to the extent the Intervenor Companies disagree with any valuation of the Property, the Condemnation Suit is the proper forum to address those concerns. Any issues related to property right disputes or property values have no relation to the State’s statutory enforcement action.

⁵ The vast majority of Graham’s Intervention merely restates, word-for-word, Graham’s factual allegations and legal arguments from the Federal Suit. Intervention 3.

⁶ The Travis County Commissioners Court voted against Graham’s proposed development plan on August 1, 2023. Nevertheless, Graham moved forward with acquiring the Property on February 21, 2024.

28. The Federal Suit and Condemnation Suit are fundamentally different than the State's Suit, and intervention would only complicate this case by multiplying issues that are currently being litigated in other, more proper forums. The Intervention should be struck because the Intervenor Companies raise no issues and assert no claims distinct from those being litigated in parallel lawsuits.

C. Intervention is Not Essential to Protect the Intervenor Companies' Interest

29. This Court should also strike the Intervention because it is not essential to protect the Intervenor Companies' interest. *Guar. Fed. Sav. Bank v. Horseshoe Operating Co.*, 793 S.W.2d 652, 657 (Tex. 1990); *Doe v. Carroll*, No. 03-08-00556-CV, 2009 WL 1811002, at *5 (Tex. App.—Austin, June 23, 2009). When determining whether intervention is essential, other available avenues to protect an intervenor's interest may be considered. *L. Offs. of Windle Turley, P.C. v. Ghiasinejad*, 109 S.W.3d 68, 70–71 (Tex. App.—Fort Worth 2003, no pet.).

30. The Intervenor Companies do not explain what interest exists, if any, outside what is already addressed by the Federal Suit and the Condemnation Suit, nor do they explain how that interest makes intervention in the State's Suit essential. Instead, the Intervenor Companies broadly assert that their interests are “closely aligned” with the State's interest in environmental compliance.⁷ However, as the governmental regulator, TCEQ has the public-entrusted duty to protect water quality and regulate the disposal of waste. *See* Tex. Water Code §§ 5.012, 5.013(a)(3), 5.013(a)(11), 26.011; Tex. Health & Safety Code §§ 361.002(a), 361.011. It is within TCEQ's sole power and expertise to determine the most effective means to achieve statutory and regulatory compliance. *BCCA Appeal Grp., Inc. v. City of Hous.*, 496 S.W.3d 1, 10 (Tex. 2016). By bringing this suit and occupying this regulatory space, TCEQ is exercising that exclusive enforcement authority. The Intervenor

⁷ In actuality, the actions of the Intervenor Companies' or their representatives with respect to the Landfill have hindered the State's case, caused undue delays to the County's repairs, and resulted in harm to the environment. *See* Travis County's Motion to Strike Graham Development Corporation and Moo Moo Meadows, LLC's Petition in Intervention 6–7, Exhibit 1.

Companies have no express or implied authority to bring any of the State's claims. *See supra* Section II.A.

31. To the extent the Intervenor Companies seek to intervene in the State's Suit to protect their property interests related to the Landfill, this also fails. The Intervenor Companies are already participating in two other lawsuits with the County to address property and constitutional rights. *See infra* Section II.B. Those interests are better represented and addressed in those other lawsuits.

32. The Intervenor Companies' Intervention should be struck because the Intervenor Companies have not asserted any interest requiring protection beyond those already represented in other, more appropriate lawsuits.

III. CONCLUSION

33. The State's Suit against the County is a statutory enforcement action. The Intervenor Companies lack authorization to maintain such an enforcement action and would not be able to bring this lawsuit on their own. Therefore, the Intervenor Companies cannot have a justiciable interest in the State's Suit, and their Intervention must be struck. Their involvement in other litigation does not create a justiciable interest. In fact, the existence of other litigation makes the Intervenor Companies' intervention in the State's Suit likely to complicate the case by excessively multiplying unrelated issues which are already being litigated in other proceedings. Moreover, intervention is not essential because any interests the Intervenor Companies may have are protected by other means.

PRAYER

The State respectfully prays that the Court strike Graham Development Corporation and Moo Moo Meadows, LLC's Petition in Intervention.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that I have made reasonable efforts to confer with all parties who may be affected by the relief sought in this motion in a good faith effort to resolve or narrow the issues raised. I further certify that I have made reasonable efforts to confer with all parties about the date, time, and format of the setting of the forgoing motion.

/s/ Haley Marlow
HALEY MARLOW
Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing *State of Texas's Motion to Strike Graham Development Corporation and Moo Moo Meadows, LLC's Petition in Intervention* was served upon the following counsel via the court's electronic filing system on May 15, 2026:

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