



## II. Attorney's fees and costs

2.1 Plaintiff shall recover attorney's fees from Phillip Watrous in the amount of \$14,912.50.

2.2 Plaintiff shall recover its costs of court from Phillip Watrous.

## III. Post-judgment interest

3.1 Plaintiff shall recover post-judgment interest on all amounts awarded in this judgment at the annual rate of 5.00%.

## IV. Permanent Injunction

### THE COURT FURTHER ORDERS:

4.1 The Plaintiff's request for permanent injunctive relief is granted. Defendant, Phillip Watrous, all of his, agents, servants, employees, and all other persons acting in active concert or participation with him who receive notice of this Injunction are permanently enjoined as follows:

4.2 As used in this Injunction, the words and terms set forth below have the following meanings:

- A. "Effective Date" means the date on which this Final Summary Judgment is signed by the Court.
- B. "Property" means Lots 10 and 11, Block 1, of the Amended Rutherford Harding Addition to the City of Port Isabel, Cameron County, Texas. A true and correct copy of the recorded plat for the Amended Rutherford Harding Addition to the City of Port Isabel is attached to this Final Summary Judgment as Attachment 1 and is incorporated herein by reference.

4.3 Immediately upon the Effective Date of this Judgment, the Defendant must cease all activities of advertising the sale or lease of mobile home spaces in the Property until the Commissioners' Court of Cameron County has approved a plat for Defendant's subdivision of the Property.

4.4 Immediately upon the Effective Date of this Judgment, the Defendant must not execute any new leases for mobile home units, mobile home lots, or any other type of sale or lease in the Property until the Commissioners' Court of Cameron County has approved a plat for Defendant's subdivision of the Property.

4.5 Within sixty (60) days after the Effective Date of this Judgment, Defendant must hire a registered professional engineer to prepare a plat for Defendant's subdivision of the Property.

4.6 Within one hundred and eighty (180) days after the Effective Date of this injunction, Defendant must submit a proposed plat prepared by a registered professional engineer to the Cameron County Department of Transportation for approval of Defendant's subdivision of the Property.

4.7 Defendant must diligently pursue approval of the plat for his subdivision of the Property and obtain approval of the plat from the Cameron County Commissioners' Court no later than two hundred and seventy (270) days after the Effective Date of this Judgment.

4.8 Within fifteen (15) days after the Effective Date of this injunction, Defendant must file a written certification with the Court which lists all mobile homes that are currently at the Property and all residents who are currently occupying each mobile home.

4.9 Defendant must allow investigators with the Office of the Attorney General access to the Property at any time between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday, to verify Defendant's compliance with this injunction.

THE COURT FURTHER ORDERS that the Clerk of this Court shall issue a writ of permanent injunction against the Defendant as set forth above.

THE COURT FURTHER ORDERS that execution to issue for this judgment.

THE COURT FURTHER ORDERS that the Plaintiff shall be allowed such writs and processes as may be necessary to enforce this judgment.

This judgment finally disposes of all parties and all claims, and is appealable. All relief not expressly granted is denied.

SIGNED on July 30, 2013.

S. L. Y. L.  
JUDGE PRESIDING

APPROVED AS TO FORM:

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

JOHN B. SCOTT  
Deputy Attorney General for Civil Litigation

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ATTORNEYS FOR THE STATE OF TEXAS

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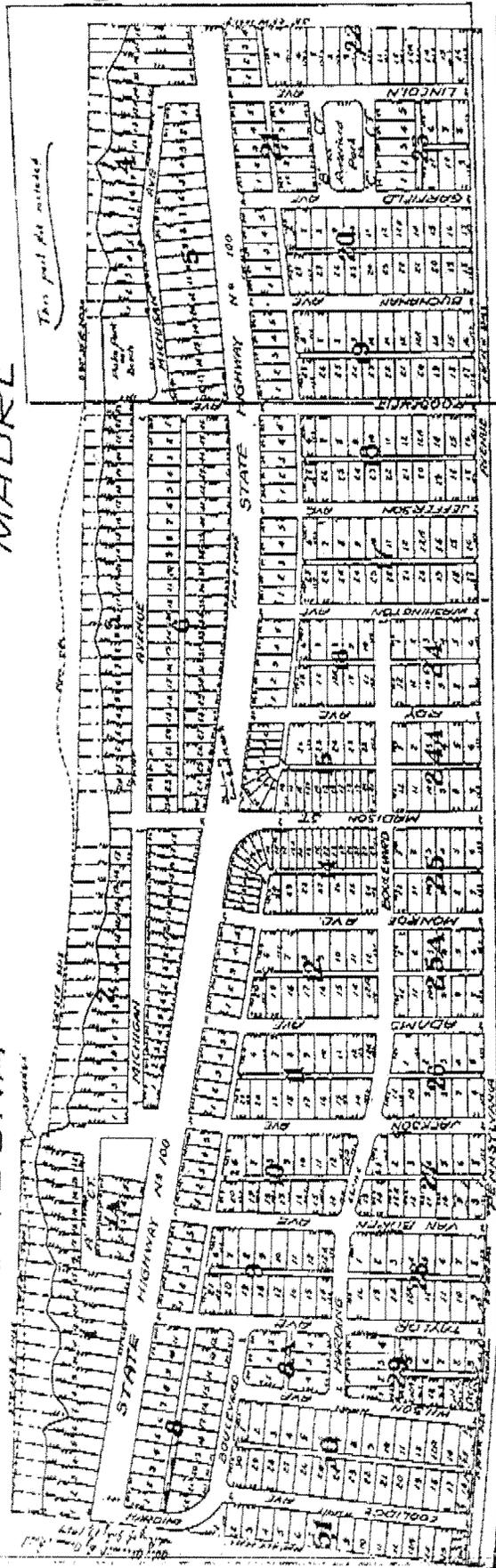
Attorney for Defendant Phillip Watrous

# Attachment 1

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MADRE

LAGUNA



AMENDED  
**MAP OF THE  
 RUTHERFORD-HARDING ADDITION  
 TO  
 PORT ISABEL**  
 SCALE 1" = 150'

MAY 1931

R.P. JACKSON ENG.

28375 of 28382  
 and was amended by District Judge of the Superior Court of the State of California on the 15th day of July 1931.  
 Signed and sealed after me this 15th day of July 1931.  
 J. P. Jackson, District Judge

28375 of 28382  
 and was amended by District Judge of the Superior Court of the State of California on the 15th day of July 1931.  
 Signed and sealed after me this 15th day of July 1931.  
 J. P. Jackson, District Judge