

NO. 471-03088-2021

STATE OF TEXAS,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
BINT OPERATIONS LLC	§	COLLIN COUNTY, TEXAS
d/b/a BLESSINGS IN NO TIME;	§	
LASHONDA STYMILL MOORE,	§	
Individually and in her capacity as an	§	
officer of BINT OPERATIONS LLC;	§	
and	§	
MARLON DEANDRE MOORE,	§	
Individually and in his capacity as an	§	
officer of BINT OPERATIONS LLC,	§	
	§	
<i>Defendants.</i>	§	471 ST JUDICIAL DISTRICT

**JOINT MOTION FOR ENTRY OF AGREED FINAL JUDGMENT
WITH PERMANENT INJUNCTION**

TO THE HONORABLE DISTRICT JUDGE BOURESSA:

Plaintiff, the State of Texas, by and through its Provisional Attorney General, ANGELA COLMENERO, and her Consumer Protection Division (PLAINTIFF), and Defendants BINT OPERATIONS LLC dba Blessings in No Time, LASHONDA STYMILL MOORE and MARLON DEANDRE MOORE, and file this Joint Motion for Entry of Agreed Final Judgment with Permanent Injunction (Agreed Motion). In support of this Agreed Motion, the Parties offer as follows:

1. Plaintiff and Defendants (the Parties), with the benefit of counsel and full understanding and consent to the terms, have reached agreement to resolve this matter by the proposed Agreed Final Judgment and Permanent Injunction (AFJPI), included as Exhibit A to this Motion.
2. The Parties believe entry of this proposed AFJPI is in the best interests of the Parties, and the public interest.
3. The Parties jointly move the Court to enter this proposed AFJPI.

Respectfully submitted,

ANGELA COLMENERO
Provisional Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

JAMES LLOYD
Deputy Attorney General for Civil Litigation

RYAN BAASCH
Chief, Consumer Protection Division

/s/ Robert Robinson 02-25-23

ROBERT ROBINSON

SBN: 00794545

robert.robinson@oag.texas.gov

Lead Counsel of Record
Assistant Attorney General
Consumer Protection Division
Office of the Texas Attorney General
12221 Merit Drive, Ste. 650
Dallas, Texas 75251
T: (214) 969-7639 F: (214) 969-7615

Counsel for Plaintiff, State of Texas

/s/ Justin Bryan

JUSTIN N. BRYAN

Texas Bar No. 24072006

KRISTIN M. HECKER

Texas Bar No. 24116499 McCathern, PLLC

3710 Rawlins Street, Suite 1600

Dallas, Texas 75219

(214) 741-2662

jbryan@mccathernlaw.com

khecker@mccathernlaw.com

*Counsel for Defendants BINT Operations LLC,
LaShonda Moore, and Marlon Moore*

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.

Zoann Willis on behalf of Robert Robinson

Bar No. 794545

zoann.willis@oag.texas.gov

Envelope ID: 77856200

Filing Code Description: Motion

Filing Description: Joint Motion for Entry of Agreed Final Judgment with
Permanet Injunction

Status as of 7/26/2023 9:28 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
McCathern Receptionist		receptionist@mccathernlaw.com	7/25/2023 12:13:32 PM	SENT
Donald E.Godwin		DGodwin@GodwinBowman.com	7/25/2023 12:13:32 PM	SENT
Stefanie MajorMcGregor		SMcGregor@GodwinBowman.com	7/25/2023 12:13:32 PM	SENT
Justin N.Bryan		jbryan@mccathernlaw.com	7/25/2023 12:13:32 PM	SENT
Cecily Valadez		cvaladez@mccathernlaw.com	7/25/2023 12:13:32 PM	SENT
Sue Jennings		sue.jennings@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
sandy mahone		sandy.mahone@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
Michael Todd	20098600	Todd@ToddLaw.org	7/25/2023 12:13:32 PM	SENT
Zoann Willis		zoann.willis@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
robert crobinson		robert.robinson@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
Kristin Hecker		khecker@mccathernlaw.com	7/25/2023 12:13:32 PM	SENT
Nichole Hargers		nhargers@godwinbowman.com	7/25/2023 12:13:32 PM	SENT
Rachel Magdaleno --Paralegal		RMagdaleno@GodwinBowman.com	7/25/2023 12:13:32 PM	SENT
Kristin Burns		KBurns@GodwinBowman.com	7/25/2023 12:13:32 PM	ERROR
Rowland Jackson		rjackson@mccathernlaw.com	7/25/2023 12:13:32 PM	SENT
Dylan J.Anderson		DAnderson@GodwinBowman.com	7/25/2023 12:13:32 PM	SENT
Nicholas Norris		nnorris@joneswalker.com	7/25/2023 12:13:32 PM	SENT
Brooke Worcester		brooke.worcester@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
Brian King		Brian.king@oag.texas.gov	7/25/2023 12:13:32 PM	SENT
Matthew Greene		matthew.green@oag.texas.gov	7/25/2023 12:13:32 PM	SENT

Associated Case Party: State of Texas

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.

Zoann Willis on behalf of Robert Robinson

Bar No. 794545

zoann.willis@oag.texas.gov

Envelope ID: 77856200

Filing Code Description: Motion

Filing Description: Joint Motion for Entry of Agreed Final Judgment with
Permanet Injunction

Status as of 7/26/2023 9:28 AM CST

Associated Case Party: State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Vanessa Brown		vanessa.brown@oag.texas.gov	7/25/2023 12:13:32 PM	ERROR