

building is not a question for this Court: but it is the Court's proper function to ensure that all rights are protected through a fair and democratic process.

I. INTRODUCTION

1. This case arises from the City's decision to convene a Special Called City Council Meeting on Wednesday, June 10, 2026, for the purpose of authorizing the City Manager to "pursue opportunities for the redevelopment of the property located at 1500 Marilla Street" – Dallas City Hall, an architecturally significant building designed by the internationally renowned architect I.M. Pei and completed in 1978.

2. The agenda also purports to direct the City Manager to plan for moving departments out of Dallas City Hall and to appropriate an unknown amount of money for the processes.

3. In doing so, the City is attempting to ram through this momentous decision at a special meeting called on short notice, without proper briefing of all City Council members, without compliance with the City's own Financial Management Performance Criteria ("FMPC"), and with agenda language that fails to provide the public with adequate notice of the scope and nature of the proposed action.

4. The City took this action despite Councilmember Bazaldua's timely written request to defer Agenda Item 4 pursuant to Section 7.11 of the City Council Rules of Procedure—a request that was summarily denied by the City Secretary on the dubious grounds that the deferral mechanism does not apply to special meetings. This interpretation appears designed to circumvent the procedural safeguards that protect the public's right to meaningful notice and participation in consequential civic decisions. The

Councilmember Plaintiffs – elected representatives of Dallas citizens – have been denied their ability to provide input and request reasonable postponement, and the public has been denied adequate notice of what the City proposes to do with one of Dallas’s most iconic civic buildings.

5. The City and City Secretary Johnson have also denied certain members of the public the opportunity to speak at the specially called meeting in violation of their First Amendment right to petition for redress of grievances. She has done this only to opponents of the plan to abandon Dallas City Hall and not for the idea’s proponents such as Dallas County Commissioner John Wiley Price.

II. DISCOVERY CONTROL PLAN

6. Plaintiffs propose that discovery be conducted as a Level 3 case pursuant to Texas Rule of Civil Procedure 190.4.

III. PARTIES

7. Plaintiff Paula Blackmon is a duly elected member of the Dallas City Council, representing District 9. She may be served through her undersigned counsel of record.

8. Plaintiff Adam Bazaldua is a duly elected member of the Dallas City Council, representing District 7. He submitted the deferral request that is central to this action. He may be served through his undersigned counsel of record.

9. Plaintiff Cara Mendelsohn is a duly elected member of the Dallas City Council, representing District 12. She may be served through her undersigned counsel of record.

10. Defendant City of Dallas, Texas is a home-rule municipality incorporated in Dallas County, Texas, with its principal place of business at 1500 Marilla Street, Dallas, Texas 75201. It may be served through the City Attorney, Bertram Vandenberg, located at 1500 Marilla Street, Room 7DN, Dallas, Texas 75201.

11. Defendant Kimberly Bizer Tolbert is sued in her official capacity as City Manager of the City of Dallas. She may be served at 1500 Marilla Street, Room 4EN, Dallas, Texas 75201.

12. Defendant Bilierae Johnson is sued in her official capacity as City Secretary of the City of Dallas. She denied Councilmember Bazaldua's deferral request and is responsible for the agenda and meeting notices at issue. She may be served at 1500 Marilla Street, Room 5DS, Dallas, Texas 75201.

IV. JURISDICTION AND VENUE

13. Jurisdiction is proper in this Court. Pursuant to Section 551.142 of the Texas Government Code, a district court has jurisdiction over an action brought to stop, prevent, or reverse a violation of the Texas Open Meetings Act. This Court also has jurisdiction over Plaintiffs' claims for declaratory and injunctive relief. This Court also has jurisdiction over the City to determine whether it has violated state law or its own ordinances.

14. Venue is proper in Dallas County pursuant to Texas Civil Practice and Remedies Code § 15.002(a)(1) because all or a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Dallas County, Texas. Venue is also proper

pursuant to Texas Civil Practice and Remedies Code § 15.002(a)(3), because Defendants' principal offices are located in Dallas County, Texas.

15. In accordance with Rule 47(c) of the Texas Rules of Civil Procedure, Plaintiffs seek immediate and permanent injunctive relief to prevent irreparable injury by Defendants.

V. FACTUAL BACKGROUND

A. The Public Has Demonstrated Special Interest in the Debate Over Dallas City Hall, A Historically Significant Landmark.

16. Dallas City Hall is located at 1500 Marilla Street in downtown Dallas, Texas. The building serves as the seat of Dallas city government and houses the offices of the Mayor, City Council, City Manager, and various municipal departments. The building was designed by the internationally renowned architect I.M. Pei—the architect of the National Gallery of Art's East Building, the Louvre Pyramid, the John F. Kennedy Library, and numerous other iconic structures—and completed in 1978.

17. Dallas City Hall has been recognized by architectural historians and preservation organizations as one of the most significant examples of late modernist civic architecture in the United States. The building has been featured in numerous architectural publications, including the American Institute of Architects' guide to Dallas architecture, and has received recognition from Docomomo (Documentation and Conservation of Buildings, Sites, and Neighborhoods of the Modern Movement), an international organization dedicated to the preservation of modern architecture. The building's distinctive inverted trapezoidal form, its bold concrete construction, and its monumental civic presence exemplify the best of American public architecture.

18. The proposed redevelopment of Dallas City Hall has generated significant public concern. Citizens and preservation advocates have expressed alarm at the prospect of losing or altering this civic landmark. The expedited manner in which the City is proceeding—scheduling a vote at a special called meeting without adequate public notice or council deliberation—has heightened these concerns and suggests an intent to circumvent the public participation that decisions of this magnitude warrant. Any decision to pursue “redevelopment” of this property is a matter of profound public importance, affecting not only the functioning of city government but also the architectural heritage and civic identity of Dallas.

19. The loss or alteration of this irreplaceable civic landmark cannot be undone. Once a decision is made to pursue “redevelopment,” the building may be damaged or destroyed before legal remedies can be obtained.

B. The Special Called City Council Meeting and Agenda Items 1-4 Are Illegal Attempts to Unilaterally Decide the Future of Dallas City Hall Without Public or Adequate Elected Input.

20. The City of Dallas has scheduled a Special Called City Council Meeting for Wednesday, June 10, 2026. Attached hereto as **Exhibit A** is a true and correct copy of the Special Meeting Agenda.

21. Agenda Item 1 of this special meeting states: “Authorize (1) advance work towards the relocation of city hall staff and functions; (2) the City Manager to (a) negotiate and execute pre-development agreements and (b) conduct due diligence for prospective sites; and (3) the appropriation of \$_____ and disbursement of payments to conduct due diligence, including reimbursement of property owner’s expenses related to

that due diligence, for prospective sites.” This agenda language is deeply problematic. It does not specify what “advance work” entails, what “pre-development agreements” would authorize, which “prospective sites” are under consideration, what amount of money would be appropriated (leaving this crucial figure blank), who might receive reimbursements for “property owner’s expenses,” or what safeguards exist to protect taxpayer funds in this process.

22. Agenda Item 2 of this special meeting states: “Authorize (1) advance work towards the relocation of 911 and emergency operations; (2) the City Manager to (a) negotiate and execute pre-development agreements and (b) conduct due diligence for prospective sites; and (3) the appropriation of \$_____ and disbursement of payments to conduct due diligence, including reimbursement of property owner’s expenses related to that due diligence, for prospective sites.” This agenda language suffers from the same fundamental deficiencies as Item 1. It does not identify the specific sites being considered for relocating critical 911 and emergency operations, does not define the scope of “pre-development agreements” the City Manager would be authorized to execute, leaves the appropriation amount completely blank, and provides no criteria for evaluating whether the relocation would maintain or improve emergency response capabilities for Dallas residents.

23. Agenda Item 3 of this special meeting states: “Authorize (1) a phased city hall repair strategy for 1500 Marilla Street as presented on June 3, 2026, and (2) the City Manager to implement the selected phased city hall repair strategy for 1500 Marilla Street in accordance with a proposed city hall repair program.” This agenda language is

insufficiently specific. It references a repair strategy “as presented on June 3, 2026” without incorporating that presentation into the agenda or describing its contents, does not identify what “phases” are contemplated or their timeline, does not specify the cost of the repair program, does not define the scope of authority being delegated to the City Manager to “implement” the strategy, and does not explain how this repair strategy interacts with the simultaneous proposals in Items 1, 2, and 4 to relocate functions and pursue “redevelopment” of the same property.

24. Agenda Item 4 of this special meeting states: “Authorize the City Manager to pursue opportunities for the redevelopment of the property located at 1500 Marilla Street.” This agenda language is troublingly vague. It does not specify what “redevelopment” means, what “opportunities” might be pursued, what the scope of the City Manager’s authority would be, what criteria would govern her decisions, or what the anticipated impacts on city operations, finances, or the building itself might be. This item has only been discussed at the Finance Committee and Economic Development Committee meetings. It has not been presented to the full City Council for discussion and consideration.

25. The use of a “special called” meeting under Section 2.2 of the City Council Rules of Procedure—rather than a regular meeting—appears calculated to avoid the procedural safeguards that protect councilmembers and the public. Special meetings are intended for urgent matters requiring immediate attention, not for decisions of this magnitude that warrant full deliberation.

C. Councilmember Bazaldua's Deferral Request and the City Secretary's Flawed Denial.

26. On June 5, 2026, Councilmember Adam Bazaldua submitted a memorandum to City Secretary Bilierae Johnson requesting deferral of Agenda Item 4 pursuant to Section 7.11 of the City Council Rules of Procedure. Attached hereto as **Exhibit B** is a true and correct copy of Bazaldua's Correspondence with Secretary Johnson, and Secretary Johnson's response.

27. Councilmember Bazaldua's memorandum stated that "[t]his item is being brought forward prematurely and should be postponed until the City Manager has provided a briefing to the full City Council regarding the scope, objectives, potential uses, and anticipated impacts of any proposed redevelopment of the property." **Ex. B**, at 1 (Bazaldua Letter).

28. Councilmember Bazaldua's memorandum further stated that "City Council Members should have the opportunity to ask questions, provide feedback, and fully understand the implications of the proposed action before authorizing the City Manager to move forward."

29. On the same day, June 5, 2026, City Secretary Johnson denied the deferral request. The City Secretary's response stated that "Agenda Item 4 is not eligible for deferral" because, she says, Section 7.11(a) "only addresses regular City Council voting agenda meetings" and therefore "a single councilmember cannot administratively defer an item appearing on a Special Meeting agenda called pursuant to Section 2.2."

30. The City Secretary's position is not supported by any authority. Her response creates an artificial distinction that Section 7.11(a) is "directed to the advance

preparation of a regular city council voting agenda” and therefore does not reach items posted for a special meeting under Section 2.2. But Section 7.11 contains no language excluding special meetings, and the City Secretary identifies none—she infers the exclusion from context alone. Where the Rules of Procedure intend to limit a councilmember’s rights to a particular category of meeting, they say so expressly; the absence of any such limitation in Section 7.11 forecloses the City Secretary’s reading.

31. Worse, the City’s construction of the rules produces an absurd result: it would strip councilmembers of their deferral rights precisely when city leadership invokes the more expedited special-meeting process to push through a consequential decision on short notice. Reading the Rules to afford councilmembers fewer procedural protections for special meetings than for routine ones inverts their evident purpose and rewards the very gamesmanship at issue here.

32. The City Secretary’s suggestion that Councilmember Bazaldua’s sole recourse was a floor motion to “Postpone to a Certain Time,” subject to majority approval during the June 10 meeting, ignores the procedural right granted to council members. A remedy that depends on the assent of the same council majority advancing Agenda Item 4 is illusory, and it does not cure the antecedent harm—the denial of the deliberation, briefing, and informed participation that the deferral mechanism exists to protect. Texas courts disfavor statutory interpretations that produce absurd results. *See Hays County v. Hays County Water Planning Partnership*, 106 S.W.3d 349, 355 (Tex. App. — Austin 2003, no pet.) (reviewing commissioners court action to determine whether interpretation was “reasonable” and consistent with the body’s expressed intent).

D. The City's Failure to Comply with the City Charter and Financial Management Performance Criteria.

33. Under the City Charter, the City Manager's duties include:

(8) To keep the council at all times fully advised as to the financial condition and needs of the city. . . . [and] (10) To see to it that the city lives within its budget.

34. Further the City Charter requires that the City Council impose rules for "adequate and appropriate prior review and consideration of official action":

SEC. 13. POLICY-MAKING PROCEDURES AND OVERSIGHT RESPONSIBILITIES. (a) In the performance of the powers of government, it is the duty of the mayor and the city council to make suitable provision for the assurance of adequate and appropriate prior review and consideration of official actions to be taken by the city council, and to assure that a high performance level of services to the citizens is maintained, responsiveness to the people is provided, and accountability in municipal government is assured. To this end, the city council shall:

(1) adopt rules of procedure governing the conduct of city council meetings and the introduction, consideration, and method of review of actions to be considered by the city council, consistent with the city manager's authority to present directly to the entire city council the city manager's operational agenda;

35. The City of Dallas has adopted Financial Management Performance Criteria ("FMPC") that govern major financial and capital undertakings. Among other requirements, the FMPC requires the City Manager to present a five-year financial forecast before the City Council authorizes significant capital undertakings, and requires a super-majority vote for certain actions.

36. The City has not complied with the FMPC requirements in connection with Agenda Item 4. No five-year financial forecast has been presented to the City Council

regarding the proposed redevelopment. No analysis of the potential costs, financing requirements, or fiscal impacts has been provided. The City has not obtained the required super-majority vote. Indeed, the agenda item does not even reference the FMPC requirements or seek a super-majority authorization.

37. Proceeding with Agenda Item 4 without satisfying these prerequisites would circumvent important fiscal safeguards designed to protect Dallas taxpayers from ill-considered expenditures and commitments.

E. Conditions Precedent.

38. All conditions precedent to the following claims and causes of action have occurred, been performed, or waived.

VI. CAUSES OF ACTION

COUNT ONE: VIOLATION OF THE TEXAS OPEN MEETINGS ACT (TOMA), TEXAS GOVERNMENT CODE CHAPTER 551 BY THE CITY

39. All factual allegations set forth elsewhere in this Petition are expressly incorporated by reference into Count One.

40. The Texas Open Meetings Act (“TOMA”) is codified at Texas Government Code Chapter 551. TOMA requires that meetings of governmental bodies be open to the public and that adequate notice of such meetings be provided. Tex. Gov’t Code §§ 551.002, 551.041.

41. TOMA requires that notice of a meeting include “the subjects of each deliberation” scheduled for the meeting. Tex. Gov’t Code § 551.041. The purpose of this requirement is to ensure that the public has meaningful notice of what governmental

action is being contemplated, so that citizens can attend, participate, and hold their elected officials accountable.

42. Texas courts have held that agenda language must be sufficiently specific to apprise the general public of the subjects to be considered at the meeting. Vague or overbroad agenda descriptions that fail to provide adequate notice violate TOMA. *Cox Enterprises, Inc. v. Board of Trustees of Austin Independent School District*, 706 S.W.2d 956 (Tex. 1986).

43. The agenda description for Item 4 – “Authorize the City Manager to pursue opportunities for the redevelopment of the property located at 1500 Marilla Street” – is impermissibly vague. It does not specify:

- a. What scope of authority would be delegated to the City Manager – whether she could bind the City, enter contracts, or commit city resources;
- b. What “redevelopment” means – whether demolition, renovation, sale, lease, public-private partnership, or some other disposition;
- c. What “opportunities” might be pursued – soliciting bids, negotiating with specific parties, issuing RFPs, or authorizing transactions;
- d. What parameters, criteria, or limitations would govern the City Manager’s actions; or
- e. What the anticipated timeline, cost, or impact on city operations might be.

44. A reasonable member of the public reading this agenda item would have no meaningful understanding of what action the City Council is being asked to authorize. This violates TOMA’s notice requirements.

45. Similarly, Agenda Items 1-3 are impermissibly vague and fail to provide adequate notice:

- a. Agenda Items 1 & 2 are to “Authorize advance work towards the relocation . . . negotiate and execute pre-development agreement . . . and the appropriation of \$_____ . . .” There is no notice about what type of work, what agreements or even the magnitude of the appropriation. It is also fails to give notice of whether the appropriation is for \$1,000 or \$100,000,000—vastly different proposals that would invite vastly different public input.
- b. Agenda Item 3 is to “Authorize a phased city hall repair strategy . . . as presented on June 3.” This notice is inadequate for anyone other than those in attendance at a June 3 meeting—and individuals who presented at that June 3 meeting is barred (according to the City Secretary) from presenting at the June 10 meeting.

46. TOMA provides that a district court may grant injunctive relief to “stop, prevent, or reverse a violation” of the Act. Tex. Gov’t Code § 551.142. TOMA further provides that sovereign immunity is waived for purposes of such injunctive relief. *Id.*

47. Plaintiffs are entitled to injunctive relief enjoining Defendants from proceeding with Agenda Item 4 at the June 10, 2026 meeting, or alternatively, requiring Defendants to re-notice the meeting with an agenda that provides adequate notice of the subjects to be considered.

COUNT TWO: DECLARATORY JUDGMENT

48. All factual allegations set forth elsewhere in this Petition are expressly incorporated by reference into Count Two.

49. In 2024, the City of Dallas waived sovereign immunity against claims by its residents to enforce the City Charter by adopting Proposition S as an amendment to the City Charter.¹

50. The City Charter requires the City Manager:

(8) To keep the council at all times fully advised as to the financial condition and needs of the city. . . . [and] (10) To see to it that the city lives within its budget.

51. And the City Charter requires that the City Council impose rules for “adequate and appropriate prior review and consideration of official action”:

SEC. 13. POLICY-MAKING PROCEDURES AND OVERSIGHT RESPONSIBILITIES. (a) In the performance of the powers of government, it is the duty of the mayor and the city council to make suitable provision for the assurance of adequate and appropriate prior review and consideration of official actions to be taken by the city council, and to assure that a high performance level of services to the citizens is maintained, responsiveness to the people is provided, and accountability in municipal government is assured. To this end, the city council shall:

(1) adopt rules of procedure governing the conduct of city council meetings and the introduction, consideration, and method of review of actions to be considered by the city council, consistent with the city manager’s authority to present directly to the entire city council the city manager’s operational agenda;

¹ <https://citysecretary2.dallascityhall.com/pdf/Elections/2024/110524SE/PCL.pdf>; https://dallashero.org/wp-content/uploads/2024/07/Dallas-Petition-Citizen-Enforcement-FINAL_removed.pdf;

52. Consistent with the City Charter, the City of Dallas has adopted Financial Management Performance Criteria (“FMPC”) that establish fiscal safeguards governing major financial decisions.

53. Specifically, FMPC Criterion 20 provides: “Prior to authorization of new or replacement facilities/buildings or renovation of previously decommissioned facilities/buildings, the City Manager will provide the total estimated capital cost and five-year forecast of ongoing operating and maintenance costs to City Council. Operating expenditures will be programmed to include the cost of implementing service of the capital improvements, and future revenues necessary for these expenditures will be estimated and provided for prior to undertaking the capital improvement. The City Council will authorize each new or reopened facility/building by super-majority vote.”

54. The City has not satisfied any of these requirements with respect to Agenda Item 4. Authorization to “pursue opportunities for the redevelopment” of Dallas City Hall—a building that houses the seat of city government and likely has substantial value—constitutes a significant capital undertaking subject to the FMPC requirements.

55. The City has not complied with the FMPC requirements. No five-year financial forecast has been presented to the full City Council. No analysis of potential costs, financing structures, or fiscal impacts has been provided. Agenda Item 4 was presented only to committees, not to the full Council as required.

56. Proceeding with Agenda Item 4 without compliance with the FMPC would violate the City’s own adopted financial policies and circumvent fiscal safeguards designed to protect Dallas taxpayers, as required by the City Charter.

57. Moreover, Section 7.11 of the City Council Rules of Procedure provides a mechanism for councilmembers to defer voting items appearing on city council agendas. This is precisely what the City Charter required of the City Council to ensure “adequate and appropriate prior review and consideration of official actions to be taken by the city council.”

58. The City Secretary’s interpretation – that Section 7.11 applies only to regular meetings and not to specially called meetings – finds no support in the text of Section 7.11, which contains no exclusion for special meetings, and produces the untenable result that councilmembers possess fewer procedural protections for consequential matters rushed onto a special-meeting agenda than for routine business.

59. By denying Councilmember Bazaldua’s timely deferral request on that basis, the City unreasonably and arbitrarily deprived the Councilmember Plaintiffs of their procedural rights as elected representatives. The injury is concrete and particularized: the Councilmember Plaintiffs have been foreclosed from the briefing, deliberation, and informed vote that the Rules guarantee them, and the City’s proposed alternative – a floor motion subject to the assent of the same majority advancing Agenda Item 4 – offers no meaningful opportunity to vindicate those rights.

60. Texas courts recognize that elected officials and citizens may challenge governmental actions taken in violation of procedural requirements. *Hays County v. Hays County Water Planning Partnership*, 106 S.W.3d 349 (Tex. App. – Austin 2003, no pet.).

61. The City’s decision to schedule this momentous decision for a specially called meeting – thereby avoiding the procedural safeguards available at regular

meetings – and to deny Councilmember Bazaldua’s timely deferral request, violates the Councilmember Plaintiffs’ rights to meaningful participation in City Council deliberations. When a party brings a declaratory-judgment action to determine whether a governmental body has acted illegally, immunity from suit is waived by the Uniform Declaratory Judgment Act (“UDJA”). *Hays County v. Hays County Water Planning Partnership*, 106 S.W.3d 349, 359 (Tex. App. – Austin 2003, no pet.). The UDJA “applies when a commissioners court is alleged to have taken an illegal action” and that the statute “waive[s] sovereign immunity when a party seeks the ancillary relief of an injunction with a declaration.” *Id.* (citing *Texas Education Agency v. Leeper*, 893 S.W.2d 432, 446 (Tex. 1994)).

62. Plaintiffs are entitled to injunctive relief enjoining Defendants from proceeding with Agenda Item 4 until the City has complied with all applicable FMPC requirements.

COUNT THREE: VIOLATION OF HISTORIC LANDMARK PRESERVATION REQUIREMENTS

63. All factual allegations set forth elsewhere in this Petition are expressly incorporated by reference into Count Four.

64. Dallas City Hall is eligible for designation as a historic landmark under Chapter 51A, Article X of the Dallas Development Code. Under Section 51A-10.102, a structure is eligible for historic designation if it is at least 50 years old or of exceptional importance, and possesses architectural significance. Dallas City Hall, completed in 1978, will reach the 50-year threshold in 2028 and possesses exceptional architectural

significance as a masterwork of I.M. Pei, one of the most celebrated architects of the 20th century.

65. Under Section 51A-10.105 of the Dallas Development Code, it is unlawful to demolish, remove, or significantly alter a structure that is pending designation as a historic landmark or that is eligible for such designation, without first obtaining a certificate of appropriateness from the Landmark Commission. The City's proposed "redevelopment" of Dallas City Hall—the scope and nature of which remains undefined—may constitute demolition, removal, or significant alteration of a structure eligible for landmark designation.

66. The National Historic Preservation Act, 54 U.S.C. § 300101 et seq., and the Texas Historical Commission's implementing regulations require that federal undertakings affecting historic properties be subject to review under Section 106 of the NHPA. If any federal funding, permits, or approvals are involved in the proposed redevelopment of Dallas City Hall, Section 106 review may be required before the project proceeds. Upon information and belief, no such review has been conducted or initiated.

67. Plaintiffs are entitled to injunctive relief enjoining Defendants from authorizing any action that would demolish, remove, or significantly alter Dallas City Hall until the City has complied with all applicable historic preservation requirements, including any required review by the Dallas Landmark Commission and, if applicable, Section 106 review under the National Historic Preservation Act.

**EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
INJUNCTIVE RELIEF**

1. All factual allegations set forth elsewhere in this Petition are expressly incorporated by reference into this Application for Temporary Restraining Order.

2. To obtain a temporary restraining order, the applicant must plead and prove: (1) a cause of action against the defendant; (2) a probable right to the relief sought; and (3) a probable, imminent, and irreparable injury in the interim. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). The purpose of a temporary restraining order is to preserve the status quo pending a determination on the merits after a full hearing. *Walling v. Metcalfe*, 863 S.W.2d 56, 58 (Tex. 1993). Texas courts recognize that emergency injunctive relief is appropriate where the irreparable injury will occur before a hearing on a temporary injunction can be held. *In re Newton*, 146 S.W.3d 648, 651 (Tex. 2004) (orig. proceeding). A temporary restraining order “is an extraordinary remedy and does not issue as a matter of right.” *Walling*, 863 S.W.2d at 57. However, such extraordinary relief is warranted where, as here, the applicant faces imminent, irreparable harm that cannot be remedied by any relief granted after the threatened action occurs.

3. Plaintiffs satisfy all elements required for the issuance of a temporary restraining order.

4. **Emergency Relief Is Warranted.** This Court should grant emergency relief without waiting for a response from Defendants because the threatened harm will occur before a hearing can be held. The Specially Called City Council Meeting is scheduled for June 10, 2026—just two days from the date of this filing. If Defendants are not restrained before that meeting, the City Council will vote on Agenda Items 1-4, and the City Manager will be authorized to pursue redevelopment of Dallas City Hall. At that point,

the harm Plaintiffs seek to prevent will have occurred, and the purpose of injunctive relief will be defeated.

5. Texas Rule of Civil Procedure 680 authorizes the issuance of a temporary restraining order without notice to the adverse party where “it clearly appears from specific facts shown by affidavit or by the verified complaint that immediate and irreparable injury, loss, or damage will result to the applicant before notice can be served and a hearing had thereon.” Those circumstances are present here. The meeting is imminent, the agenda notice is already posted, and any delay will render injunctive relief meaningless. *See In re Newton*, 146 S.W.3d 648, 651 (Tex. 2004) (orig. proceeding) (recognizing that emergency injunctive relief is appropriate where the irreparable injury will occur before a hearing on a temporary injunction can be held).

6. The exigency of this matter cannot be overstated. Once the City Council authorizes the City Manager to “pursue opportunities for the redevelopment” of Dallas City Hall, irreversible actions may follow in rapid succession: solicitation of developer proposals, initiation of negotiations, execution of letters of intent, and commencement of planning activities that create expectations, relationships, and potential legal obligations that cannot be easily unwound. The purpose of a temporary restraining order is to “preserve the status quo of the litigation’s subject matter pending a trial on the merits.” *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). Without emergency relief before the June 10 meeting, there will be no status quo left to preserve.

7. **Causes of Action.** Plaintiffs have pleaded viable causes of action for (1) violation of the Texas Open Meetings Act based on inadequate notice; (2) violation of the

City's Financial Management Performance Criteria; (3) deprivation of the Councilmember Plaintiffs' procedural rights; and (4) violation of historic landmark preservation requirements. Each of these claims independently supports the issuance of injunctive relief.

8. **Probable Right to Relief.** A probable right of recovery is shown by alleging a cause of action and presenting evidence to sustain it. *Fox v. Tropical Warehouses, Inc.*, 121 S.W.3d 853, 857 (Tex. App. – Fort Worth 2003, no pet.). The applicant need not prove its case with absolute certainty – a reasonable probability of success is sufficient. *State v. S.W. Bell Tel. Co.*, 526 S.W.2d 526, 528 (Tex. 1975).

9. Here, Plaintiffs have demonstrated a substantial likelihood of success on the merits. The agenda descriptions for Items 1-4 are plainly vague and fail to provide meaningful notice of what action is being authorized. The City has not complied with its own FMPC requirements. And the City Secretary's denial of Councilmember Bazaldua's deferral request was based on an unreasonable interpretation of the City Council Rules of Procedure.

10. **Irreparable Harm.** Plaintiffs will suffer irreparable harm if the temporary restraining order is not granted. The June 10, 2026 special meeting is scheduled for 10:00 AM, just days away. If Defendants are permitted to proceed with Agenda Items 1-4, the City will begin relocating city hall staff and functions, relocate critical 911 and emergency operations, implement an undefined "phased repair strategy," and "pursue opportunities for the redevelopment" of Dallas City Hall—setting in motion processes that may be difficult or impossible to reverse.

11. Once the City Manager is authorized to negotiate with developers, solicit proposals, or otherwise pursue redevelopment, the City will have made representations and potentially created contractual or quasi-contractual relationships that cannot be easily undone. The public's right to transparent and lawful decision-making will have been violated, and no after-the-fact remedy can restore that right.

12. Moreover, Dallas City Hall is an irreplaceable civic landmark. Any action taken that threatens the building's continued existence or integrity constitutes irreparable harm that cannot be remedied by monetary damages. Violations of the Open Meetings Act support findings of irreparable harm justifying injunctive relief. Under TOMA, actions taken in violation of the Act are "voidable," and district courts have jurisdiction to "stop, prevent, or reverse a violation" of the Act. Tex. Gov't Code §§ 551.141, 551.142. Courts have recognized that once governmental action is taken in violation of TOMA, the harm to the public's right to transparency and participation is complete and cannot be undone by after-the-fact remedies. *See Hays County v. Hays County Water Planning Partnership*, 106 S.W.3d 349, 358 (Tex. App. – Austin 2003, no pet.) (holding that adoption of new plan did not moot claim for declaratory and injunctive relief regarding prior invalid action).

13. **Balancing of Harms and Public Interest.** The balance of harms strongly favors granting the temporary restraining order. Plaintiffs seek only to preserve the status quo pending a full hearing on the merits. The City will suffer no harm from a brief delay—it can re-notice the meeting with a proper agenda, comply with FMPC requirements, and provide the full City Council with adequate briefing.

14. The public interest also strongly favors granting the temporary restraining order. The Texas Open Meetings Act embodies the fundamental democratic principle that the public has a right to know what its government is doing. The citizens of Dallas have a profound interest in transparent and lawful decision-making regarding one of their city's most important civic buildings.

15. **Requested Relief.** Plaintiffs request that this Court issue a temporary restraining order enjoining Defendants, their agents, servants, employees, attorneys, and all other persons acting in concert or participation with them, from proceeding with Agenda Items 1, 2, 3, and 4 at the June 10, 2026 Specially Called City Council Meeting, or at any other meeting, until further order of this Court.

16. Plaintiffs further request that the Court set this Application for a Temporary Injunction for a hearing no more than fourteen days from the entry of the Temporary Restraining Order, and that upon conclusion of that hearing, enter a Temporary Injunction that shall remain in force for the duration of this lawsuit.

17. Plaintiffs finally request that upon a final hearing or other adjudication of this matter, the Court enter a Permanent Injunction that (1) voids any action taken by the City Council on Agenda Item 4 in violation of TOMA or the FMPC; (2) enjoins Defendants from taking any action on the redevelopment of Dallas City Hall until they have complied with all applicable legal requirements; and (3) requires Defendants to provide adequate public notice and full City Council briefing before any future consideration of this matter.

18. **Bond.** Plaintiffs state that a bond of \$1,000.00 is reasonable for Plaintiffs' injunctive requests. Given that Plaintiffs seek only to preserve the status quo and enforce

compliance with mandatory legal requirements, minimal bond should be required. See Tex. R. Civ. P. 684.

PRAYER

Plaintiffs pray that Defendants be cited to appear and answer and that Plaintiffs be granted relief and judgment against them as follows:

- a. A temporary restraining order enjoining Defendants from proceeding with Agenda Items 1, 2, 3, and 4 at the June 10, 2026 Specially Called City Council Meeting;
- b. A temporary injunction, after an expedited hearing, continuing the relief granted by the temporary restraining order for the duration of this lawsuit;
- c. A permanent injunction, after a trial on the merits, voiding any action taken in violation of TOMA, the FMPC, or historic landmark preservation requirements, and enjoining Defendants from proceeding with redevelopment of Dallas City Hall until all applicable legal requirements have been satisfied;
- d. A declaratory judgment that Defendants violated the Texas Open Meetings Act, the City's Charter, and applicable historic landmark preservation requirements;
- e. Attorneys' fees and costs to the extent permitted by law; and
- f. All other and further relief, special and general, at law or in equity, to which Plaintiffs may be justly entitled under the circumstances.

DATE: June 8, 2026

Respectfully Submitted,

/s/ John S. Adams

John S. Adams

Texas State Bar No. 24097277

John@dallastriallawyer.com

John S. Adams Law Firm, PLLC
100 Crescent Court, Suite 700
Dallas, Texas 75201
T: (213) 505-5406

ATTORNEY FOR PLAINTIFFS

6. I have reviewed Plaintiffs' Verified Petition And Emergency Application For Temporary Restraining Order And Temporary And Permanent Injunctive Relief. Based upon the information and documents reasonably available to me, the factual statements contained in Verified Petition And Emergency Application For Temporary Restraining Order And Temporary And Permanent Injunctive Relief are true and correct.

7. I swear and affirm under penalty of perjury that all facts contained herein are true and correct.

Executed in Dallas, Texas, on the 8th day of June, 2026.

Signature:

Adam Bazaldua

Date:

06/08/2026

EXHIBIT A

RECEIVED

2026 JUN -4 PM 11:30

**CITY SECRETARY
DALLAS, TEXAS**

City of Dallas

*1500 Marilla Street
Council Chambers, 6th Floor
Dallas, Texas 75201*

Public Notice

260559

POSTED CITY SECRETARY
DALLAS, TX



SPECIAL CALLED CITY COUNCIL MEETING

June 10, 2026

10:00 AM

SPECIAL CALLED MEETING

(For General Information and Rules of Courtesy, Please See Opposite Side.)
(La Información General Y Reglas De Cortesía Que Deben Observarse
Durante Las Asambleas Del Consejo Municipal Aparecen En El Lado Opuesto, Favor De Leerlas.)

General Information

The Dallas City Council regularly meets on Wednesdays beginning at 9:00 a.m. in the Council Chambers, 6th floor, City Hall, 1500 Marilla. Council agenda meetings are broadcast live on bit.ly/cityofdallastv and on Time Warner City Cable Channel 16. Briefing meetings are held the first and third Wednesdays of each month. Council agenda (voting) meetings are held on the second and fourth Wednesdays. Anyone wishing to speak at a meeting should sign up with the City Secretary's Office by calling (214) 670-3738 by 5:00 p.m. of the last regular business day preceding the meeting. Citizens can find out the name of their representative and their voting district by calling the City Secretary's Office.

Sign interpreters are available upon request with a 48-hour advance notice by calling (214) 670-5208 V/TDD. The City of Dallas is committed to compliance with the Americans with Disabilities Act. **The Council agenda is available in alternative formats upon request.**

If you have any questions about this agenda or comments or complaints about city services, call 311.

Rules of Courtesy

City Council meetings bring together citizens of many varied interests and ideas. To insure fairness and orderly meetings, the Council has adopted rules of courtesy which apply to all members of the Council, administrative staff, news media, citizens and visitors. These procedures provide:

- That no one shall delay or interrupt the proceedings, or refuse to obey the orders of the presiding officer.
- All persons should refrain from private conversation, eating, drinking and smoking while in the Council Chamber.
- Posters or placards must remain outside the Council Chamber.
- No cellular phones or audible beepers allowed in Council Chamber while City Council is in session.

"Citizens and other visitors attending City Council meetings shall observe the same rules of propriety, decorum and good conduct applicable to members of the City Council. Any person making personal, impertinent, profane or slanderous remarks or who becomes boisterous while addressing the City Council or while attending the City Council meeting shall be removed from the room if the sergeant-at-arms is so directed by the presiding officer, and the person shall be barred from further audience before the City Council during that session of the City Council. If the presiding officer fails to

Información General

El Ayuntamiento de la Ciudad de Dallas se reúne regularmente los miércoles en la Cámara del Ayuntamiento en el sexto piso de la Alcaldía, 1500 Marilla, a las 9 de la mañana. Las reuniones informativas se llevan a cabo el primer y tercer miércoles del mes. Estas audiencias se transmiten en vivo por la bit.ly/cityofdallastv y por cablevisión en la estación *Time Warner City Cable* Canal 16. El Ayuntamiento Municipal se reúne en el segundo y cuarto miércoles del mes para tratar asuntos presentados de manera oficial en la agenda para su aprobación. Toda persona que desee hablar durante la asamblea del Ayuntamiento, debe inscribirse llamando a la Secretaría Municipal al teléfono (214) 670-3738, antes de las 5:00 pm del último día hábil anterior a la reunión. Para enterarse del nombre de su representante en el Ayuntamiento Municipal y el distrito donde usted puede votar, favor de llamar a la Secretaría Municipal.

Intérpretes para personas con impedimentos auditivos están disponibles si lo solicita con 48 horas de anticipación llamando al (214) 670-5208 (aparato auditivo V/TDD). La Ciudad de Dallas se esfuerza por cumplir con el decreto que protege a las personas con impedimentos, *Americans with Disabilities Act*. **La agenda del Ayuntamiento está disponible en formatos alternos si lo solicita.**

Si tiene preguntas sobre esta agenda, o si desea hacer comentarios o presentar quejas con respecto a servicios de la Ciudad, llame al 311.

Reglas de Cortesía

Las asambleas del Ayuntamiento Municipal reúnen a ciudadanos de diversos intereses e ideologías. Para asegurar la imparcialidad y el orden durante las asambleas, el Ayuntamiento ha adoptado ciertas reglas de cortesía que aplican a todos los miembros del Ayuntamiento, al personal administrativo, personal de los medios de comunicación, a los ciudadanos, y a visitantes. Estos reglamentos establecen lo siguiente:

- Ninguna persona retrasara o interrumpirá los procedimientos, o se negara a obedecer las órdenes del oficial que preside la asamblea.
- Todas las personas deben abstenerse de entablar conversaciones, comer, beber y fumar dentro de la cámara del Ayuntamiento.
- Anuncios y pancartas deben permanecer fuera de la cámara del Ayuntamiento.
- No se permite usar teléfonos celulares o enlaces electrónicos (*paggers*) audibles en la cámara del Ayuntamiento durante audiencias del Ayuntamiento Municipal

"Los ciudadanos y visitantes presentes durante las asambleas del Ayuntamiento Municipal deben de obedecer las mismas reglas de comportamiento, decoro y buena conducta que se aplican a los miembros del Ayuntamiento Municipal. Cualquier persona que haga comentarios impertinentes, utilice vocabulario obsceno o difamatorio, o que al dirigirse al Ayuntamiento lo haga en forma escandalosa, o si causa disturbio durante la asamblea del

act, any member of the City Council may move to require enforcement of the rules, and the affirmative vote of a majority of the City Council shall require the presiding officer to act." Section 3.3(c) of the City Council Rules of Procedure.

Ayuntamiento Municipal, será expulsada de la cámara si el oficial que este presidiendo la asamblea así lo ordena. Además, se le prohibirá continuar participando en la audiencia ante el Ayuntamiento Municipal. Si el oficial que preside la asamblea no toma acción, cualquier otro miembro del Ayuntamiento Municipal puede tomar medidas para hacer cumplir las reglas establecidas, y el voto afirmativo de la mayoría del Ayuntamiento Municipal precisara al oficial que este presidiendo la sesión a tomar acción." Según la sección 3.3(c) de las reglas de procedimientos del Ayuntamiento.

Handgun Prohibition Notice for Meetings of Governmental Entities

"Pursuant to Section 30.06, Penal Code (trespass by license holder with a concealed handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not enter this property with a concealed handgun."

"De acuerdo con la sección 30.06 del código penal (ingreso sin autorización de un titular de una licencia con una pistol oculta), una persona con licencia según el subcapítulo h, capítulo 411, código del gobierno (ley sobre licencias para portar pistolas), no puede ingresar a esta propiedad con una pistola oculta."

"Pursuant to Section 30.07, Penal Code (trespass by license holder with an openly carried handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not enter this property with a handgun that is carried openly."

"De acuerdo con la sección 30.07 del código penal (ingreso sin autorización de un titular de una licencia con una pistola a la vista), una persona con licencia según el subcapítulo h, capítulo 411, código del gobierno (ley sobre licencias para portar pistolas), no puede ingresar a esta propiedad con una pistola a la vista."

"Pursuant to Section 46.03, Penal Code (places weapons prohibited), a person may not carry a firearm or other weapon into any open meeting on this property."

"De conformidad con la Sección 46.03, Código Penal (coloca armas prohibidas), una persona no puede llevar un arma de fuego u otra arma a ninguna reunión abierta en esta propiedad."

The Special Called City Council meeting will be held by videoconference and in the Council Chambers, 6th Floor at City Hall. Individuals who wish to speak in accordance with the City Council Rules of Procedure must sign up with the [City Secretary's Office](#).

The public may to attend the meeting virtually; however, City Hall is available for those wishing to attend the meeting in person.

The following videoconference link is available to the public to listen to the meeting and Office of Communications & Customer Experience/311 will also stream the City Council meeting on Spectrum Cable Channel 16 and bit.ly/cityofdallastv: <https://dallascityhall.webex.com/dallascityhall/j.php?MTID=m3e745e27fcb636c821fee72899692952>

BRIEFING AGENDA

- A. [26-2079A](#) Real Estate, Financial, and Debt Analysis and Plans
- A. Public Safety Facility Needs
 - B. Potential Relocation of 911/EOC
 - C. Potential Relocation of City Hall
 - D. Potential Repair Plans for City Hall

VOTING AGENDA

1. [26-2080A](#) Authorize (1) advance work towards the relocation of city hall staff and functions; (2) the City Manager to (a) negotiate and execute pre-development agreements and (b) conduct due diligence for prospective sites; and (3) the appropriation of \$_____ and disbursement of payments to conduct due diligence, including reimbursement of property owner's expenses related to that due diligence, for prospective sites.
2. [26-2081A](#) Authorize (1) advance work towards the relocation of 911 and emergency operations; (2) the City Manager to (a) negotiate and execute pre-development agreements and (b) conduct due diligence for prospective sites; and (3) the appropriation of \$_____ and disbursement of payments to conduct due diligence, including reimbursement of property owner's expenses related to that due diligence, for prospective sites.
3. [26-2082A](#) Authorize (1) a phased city hall repair strategy for 1500 Marilla Street as presented on June 3, 2026, and (2) the City Manager to implement the selected phased city hall repair strategy for 1500 Marilla Street in accordance with a proposed city hall repair program.
4. [26-2083A](#) Authorize the City Manager to pursue opportunities for the redevelopment of the property located at 1500 Marilla Street.

CLOSED SESSION**Real Estate (Sec. 551.072 T.O.M.A.) and Attorney Briefings (Sec. 551.071 T.O.M.A.).**

5. [26-2084A](#) (1) Deliberate the purchase, exchange, lease, or value of real property at certain locations related to the relocation of 311, 911, and emergency operations because deliberation in an open meeting would have a detrimental effect on the position of the governmental body in negotiations with a third person; and (2) seek the advice of the City Attorney on this matter.

6. [26-2085A](#) (1) Deliberate the purchase, exchange, lease, or value of real property at certain locations related to the relocation of city hall facilities and functions because deliberation in an open meeting would have a detrimental effect on the position of the governmental body in negotiations with a third person; and (2) seek the advice of the City Attorney on this matter.

Adjournment

EXECUTIVE SESSION NOTICE

A closed executive session may be held if the discussion of any of the above agenda items concerns one of the following:

1. seeking the advice of its attorney about pending or contemplated litigation, settlement offers, or any matter in which the duty of the attorney to the City Council under the Texas Disciplinary Rules of Professional Conduct of the State Bar of Texas clearly conflicts with the Texas Open Meetings Act. [Tex. Govt. Code § 551.071]
2. deliberating the purchase, exchange, lease, or value of real property if deliberation in an open meeting would have a detrimental effect on the position of the city in negotiations with a third person. [Tex. Govt. Code § 551.072]
3. deliberating a negotiated contract for a prospective gift or donation to the city if deliberation in an open meeting would have a detrimental effect on the position of the city in negotiations with a third person. [Tex. Govt. Code § 551.073]
4. deliberating the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of a public officer or employee; or to hear a complaint or charge against an officer or employee unless the officer or employee who is the subject of the deliberation or hearing requests a public hearing. [Tex. Govt. Code § 551.074]
5. deliberating the deployment, or specific occasions for implementation, of security personnel or devices. [Tex. Govt. Code § 551.076]
6. discussing or deliberating commercial or financial information that the city has received from a business prospect that the city seeks to have locate, stay or expand in or near the city and with which the city is conducting economic development negotiations; or deliberating the offer of a financial or other incentive to a business prospect. [Tex Govt. Code § 551.087]
7. deliberating security assessments or deployments relating to information resources technology, network security information, or the deployment or specific occasions for implementations of security personnel, critical infrastructure, or security devices. [Tex Govt. Code § 551.089]
8. deliberating cybersecurity measures, policies, or contracts solely intended to protect a critical infrastructure facility. [Tex. Gov't Code § 551.0761]

EXHIBIT B

Memorandum



CITY OF DALLAS

DATE June 5, 2026

TO Bilierae Johnson, City Secretary

SUBJECT **Deferral of Agenda Item #4**

In accordance with section 7.11 of the City Council Rules of Procedure, please defer agenda item 4 scheduled for consideration at the Wednesday, June 10, 2026, Special Called City Council meeting.

4. Authorize the City Manager to pursue opportunities for the redevelopment of the property located at 1500 Marilla Street.

This item is being brought forward prematurely and should be postponed until the City Manager has provided a briefing to the full City Council regarding the scope, objectives, potential uses, and anticipated impacts of any proposed redevelopment of the property. City Council Members should have the opportunity to ask questions, provide feedback, and fully understand the implications of the proposed action before authorizing the City Manager to move forward.

At this time, the item has only been discussed at the Finance Committee and Economic Development Committee and has not been presented to the full City Council for discussion and consideration.

If you have any questions, please contact my office at (214) 671-8919.

A handwritten signature in black ink, appearing to read 'Adam Bazaldua'.

Adam Bazaldua,
Council Member, District 7

c: Kimberly Bizer Tolbert, City Manager
Bertram Vandenberg, City Attorney (I)
Mamatha Sparks, City Auditor (I)
Bilierae Johnson, City Secretary
Preston Robinson, Administrative Judge
Baron Eliason, Inspector General (I)
Dominique Artis, Chief of Public Safety

Dev Rastogi, Assistant City Manager
M. Elizabeth (Liz) Cedillo-Pereira, Assistant City Manager
Alina Ciocan, Assistant City Manager
Robin Bentley, Assistant City Manager
Jack Ireland, Chief Financial Officer
Ahmad Goree, Chief of Staff to the City Manager
John Johnson, Chief of Real Estate
Directors and Assistant Directors

Memorandum



CITY OF DALLAS

Date June 5, 2026
To Councilmember Adam Bazaldua, Council District 6
Subject Deferral of Agenda Item 4 – June 10, 2026, Special Called City Council Meeting

I received your memorandum requesting to defer Agenda Item 4 scheduled for consideration at the Wednesday, June 10, 2026, Special Called City Council Meeting.

4. *Authorize the City Manager to pursue opportunities for the redevelopment of the property located at 1500 Marilla Street.*

Agenda Item 4 is not eligible for deferral.

This memorandum provides an explanation regarding whether an individual councilmember may administratively defer an agenda item that appears on a Special Meeting agenda called pursuant to Section 2.2 of the City Council Rules of Procedure.

Section 2.2 provides that the City Secretary shall call special meetings upon the written request of the Mayor, the City Manager, or three members of the City Council. The Rules of Procedure do not contain a provision specifically authorizing a single councilmember to administratively defer an item from a Special Meeting agenda.

Section 7.11(a) establishes a procedure that allows a councilmember to defer certain voting items appearing on the *draft* city council agenda and items that are listed as *additions to the final agenda* by submitting a written request to the City Secretary before specified deadlines. However, this procedure is tied to the regular agenda preparation process and contemplates deferral of an item until the next City Council voting agenda meeting.

Because Section 7.11(a) is directed to the advance preparation of a regular city council voting agenda and does not expressly reference Special Meetings called under Section 2.2, it does not provide a councilmember with the ability to administratively defer an item from a posted Special Meeting agenda.

Once a Special Meeting has been called and properly posted, the appropriate procedural mechanism is a motion by a councilmember to postpone or defer the item. The City Council Rules of Procedure recognize "Postpone to a Certain Time" as a permissible motion. Such a motion would be subject to consideration and action by the City Council and would require approval by the council in accordance with the applicable voting requirements.

Accordingly, it is my interpretation that:

1. Because Section 7.11(a) only addresses regular City Council voting agenda meetings, a single councilmember cannot administratively defer an item appearing on a Special Meeting agenda called pursuant to Section 2.2; and
2. An agenda item scheduled for a Special Meeting may be postponed or deferred through a motion and vote of the City Council during the meeting.

NOTE: Section 7.11 (Deferral of Agenda Items), Subsection (a) A city councilmember may defer, until the next city council voting agenda meeting, a voting item appearing on the draft city council agenda by delivering a written list of the agenda item numbers to be deferred and the reason for the deferral of each agenda item to the city secretary before 5:00 p.m. of the Friday before the city council meeting for any item on the regular agenda and before 5:00 p.m. of the Monday before the city council meeting (or if Monday is a city holiday, then 5:00 p.m. of the Tuesday before the city council meeting) for any item listed as an addition on the final agenda, unless the item:

- (1) *previously appeared on a city council meeting agenda and was deferred by request of a city councilmember;*
- (2) *was previously presented and discussed at a city council briefing meeting within the past six months at which a quorum was present during at least part of the briefing on that item;*

- (3) *is a public hearing or was previously discussed within the past six months at a public hearing before the city council; or*
- (4) *was placed on the agenda pursuant to a request by five city councilmembers.*

If you have any questions or if you need additional information, please let me know.

Biliera Johnson
Biliera Johnson
City Secretary

c: Honorable Mayor and Members of City Council
Kimberly Bizer Tolbert, City Manager
Bertram Vandenberg, City Attorney(l)

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.

Marcela Bonilla on behalf of John Adams
Bar No. 24097277
marcela@dallastriallawyer.com
Envelope ID: 115870684
Filing Code Description: Original Petition
Filing Description: TRO
Status as of 6/8/2026 3:40 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Marcela Bonilla		marcela@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT
Marcela Bonilla		marcela@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT
Marcela Bonilla		marcela@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT
John Adams		john@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT
John Adams		john@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT
John Adams		john@dallastriallawyer.com	6/8/2026 3:30:43 PM	NOT SENT