

AO 440 (Rev. 06/12) Summons in a Civil Action

25-004

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

AUDREY DICKSON-WALKER

Plaintiff(s)

v.

STONEY CLEMENT, and RAY NOLAN

Defendant(s)



Civil Action No. 3:24-cv-322

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Stoney Clement



A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

James P. Roberts

Palmer Perlstein
15455 Dallas Parkway, Suite 540
Addison, Texas 75001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Nathan Ochsner, Clerk of Court

Date: November 7, 2024



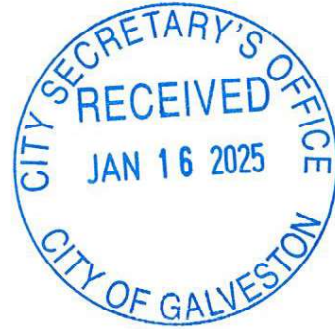
Nathan Ochsner

s/ V. Aranda
Signature of Clerk or Deputy Clerk

25-005

GRABLE
GRIMSHAW
PLLC

January 16, 2025



VIA EMAIL:

Craig Brown, Mayor
craigbrown@galvestontx.gov
Sharon B. Lewis, District 1
sharonlewis@galvestontx.gov
David Finklea, District 2
davidfinklea@galvestontx.gov
Bob Brown, District 3
bobbrown@galvestontx.gov
Donald Glywasky, City Attorney
Dglywasky@galvestontx.gov

Alex Porretto, District 4
alexporretto@galvestontx.gov
Beau Rawlins, District 5
beaurawlins@galvestontx.gov
Marie Robb, District 6
marierobb@galvestontx.gov
Doug Balli, Police Chief
Via Linda Strevell, Assistant to the Chief
lstrevell@galvestontx.gov

RE: Mr. Nicholas Gilmore: Settlement Demand and Preservation Letter

Dear Mayor Craig Brown, Chief of Police Doug Balli, and City Council:

We represent Mr. Nicholas Gilmore in his claims against the City of Galveston and specific members of the Galveston Police Department, particularly Lieutenant Joel Caldwell and Sergeant James Stewart.

This letter presents a good faith demand for settlement to resolve multiple constitutional violations Mr. Gilmore suffered. Mr. Gilmore demands \$25,000.00 (Twenty-Five Thousand Dollars and No Cents) to settle his claims.

This offer expires on January 24, 2025, at 5:00 PM CST, allowing for consideration at the regularly scheduled Galveston City Council meeting. We will be forced to file a lawsuit by March 15, 2025 to avoid statute of limitations concerns.

25-006



CITY OF GALVESTON
FIRST NOTICE OF CLAIM FORM

TO BE COMPLETED BY CLAIMANT:

NAME: Celeste Taylor-Velasco

ADDRESS City/State/Zip [REDACTED]

HOME PHONE [REDACTED] CELL/WORK [REDACTED]

EMAIL ADDRESS [REDACTED]

DATE OF LOSS 1/18/2025 TIME OF LOSS 3:15PM LOCATION 9 Mile Road - See photo of location

POLICE IN ATTENDANCE: YES NO POLICE CASE# N/A

WRITE DOWN THE REASON FOR YOUR CLAIM:

I am a Real Estate Agent, and I was on my way to show the home at 11818 Cindy Road, Galveston around 3:30PM.

We were driving down 9 Mile Road to get there, not realizing how far this pipe was sticking out of the ground (and I am assuming it was a metal pipe on the 18th from the damage that was done to the frame of my car).

The area was not marked, and was impossible to see the danger while driving up on it until I drove over it and the damage was done. Thankfully it missed my oil pan or my engine would have been completely ruined from what the car service said.

Due to the snow last week, I did not get this earlier, but was glad to see that when I went by to take pictures of the road today that the cones were out

ATTACH ANY ADDITIONAL INFORMATION/ RECEIPTS/ ETC. THAT MAY BE IMPORTANT TO YOUR CLAIM.

CLAIMANT SIGNATURE Celeste Taylor-Velasco DATE 1/27/2025
DocuSigned by: B585B3CCFB49450...

PLEASE RETURN TO: CITY OF GALVESTON
OFFICE OF CITY SECRETARY
P.O. BOX 779
GALVESTON, TEXAS 77553

25-007



CITY OF GALVESTON
FIRST NOTICE OF CLAIM FORM

TO BE COMPLETED BY CLAIMANT:

NAME: Eduardo Esquivel

ADDRESS City/State/Zip [REDACTED]

HOME PHONE [REDACTED] CELL/WORK [REDACTED]

EMAIL ADDRESS [REDACTED]

DATE OF LOSS 1-16-25 TIME OF LOSS Evening LOCATION 9 mile Rd

POLICE IN ATTENDANCE: YES NO POLICE CASE# _____

WRITE DOWN THE REASON FOR YOUR CLAIM:

Traveling N-on 9 mile in Evening. My son hit the water valve casing. City was working on it removed the barricades. Casing was left above ground level. The vehicle is a Camaro and sits low, casing caught bumper and his exhaust. Both of which are now damaged.

ATTACH ANY ADDITIONAL INFORMATION/ RECEIPTS/ ETC. THAT MAY BE IMPORTANT TO YOUR CLAIM.

CLAIMANT SIGNATURE Eduardo Esquivel DATE 1-27-25

PLEASE RETURN TO: CITY OF GALVESTON
OFFICE OF CITY SECRETARY
P.O. BOX 779
GALVESTON, TEXAS 77553

25-008



CITY OF GALVESTON
FIRST NOTICE OF CLAIM FORM

CITY CLAIM NUMBER

DATE RECEIVED BY THE
CITY SECRETARY'S OFFICE

TO BE COMPLETED BY CLAIMANT:

NAME: Marcella Gallo HOME ADDRESS [REDACTED]

HOME PHONE [REDACTED] CELL/WORK [REDACTED]

EMAIL ADDRESS [REDACTED]

DATE OF LOSS 2-30-25 TIME OF LOSS Don't know LOCATION _____

POLICE IN ATTENDANCE: YES NO POLICE CASE# _____

WRITE DOWN THE REASON FOR YOUR CLAIM:

I had my feet on the toll 7 foot
I was ride on the bus

ATTACH ANY ADDITIONAL INFORMATION/ RECEIPTS/ ETC. THAT MAY BE IMPORTANT TO YOUR CLAIM.

CLAIMANT SIGNATURE Marcella Gallo DATE 2/06/25

PLEASE RETURN TO:

CITY OF GALVESTON
OFFICE OF CITY SECRETARY
823 ROSENBERG
P.O. BOX 779
GALVESTON, TEXAS 77553

25-009



CITY OF GALVESTON
FIRST NOTICE OF CLAIM FORM

CITY CLAIM NUMBER

DATE RECEIVED BY THE
CITY SECRETARY'S OFFICE

TO BE COMPLETED BY CLAIMANT:

NAME: Eddie Calderas

HOME ADDRESS [REDACTED]

HOME PHONE _____

CELL/WORK [REDACTED]

EMAIL ADDRESS _____

DATE OF LOSS 2-3-25 TIME OF LOSS 10:34 AM LOCATION _____

POLICE IN ATTENDANCE: YES NO POLICE CASE# N/A

WRITE DOWN THE REASON FOR YOUR CLAIM:

Garbage truck license plate number 116 5946
backed into my Honda Civic 2009
1807 Conquistador Dr

ATTACH ANY ADDITIONAL INFORMATION/ RECEIPTS/ ETC. THAT MAY BE IMPORTANT TO YOUR CLAIM.

CLAIMANT SIGNATURE Eddie

DATE 02-10-25

PLEASE RETURN TO:

CITY OF GALVESTON
OFFICE OF CITY SECRETARY
823 ROSENBERG
P.O. BOX 779
GALVESTON, TEXAS 77553



STOY LAW GROUP

February 11, 2025

Via Email: citysec@galvestontx.com

Via Certified Mail #: 7022 1670 00001 5411 1707

#25-010



Attn: City Secretary
City of Galveston
823 Rosenberg St. Ste. 201
Galveston, Texas 77550

Re: Our Clients: Georgina "Gina" Hullum
Date of Injury: 2/3/2025
Business Name: Galveston Island Convention Center Parking Garage at The San Luis Resort
Incident Location: 5600 Seawall Blvd Galveston, Texas 77551

Dear Sir or Madam:

Please be advised that our law firm represents Gina Hullum, in claims for personal injuries arising out of an incident on February 3, 2025, at Galveston Island Convention Center Parking Garage at The San Luis Resort on 5600 Seawall Blvd Galveston, Texas 77551.

Please direct all correspondence and telephone calls regarding this matter to my office. Specifically, you are kindly instructed not to attempt to contact Gina Hullum or family.

We demand you immediately preserve all evidence of any type related to the above-reference claim. This request includes but is not limited to:

1. All photographs related to the above-referenced claim;
2. All audio and video records related to the above-referenced claim, including all audio and video records of my client while on your premises on the date of the subject incident;
3. Any and all incident reports, and any other compilation of information without limitation that relate to or memorialize the incident in the above-referenced claim;
4. All audio and video recordings of the incident in the above-referenced claim;
5. All audio and video recordings of the area where the incident in the above-reference claim occurred for the twenty-four hour period preceding the incident;
6. All audio and video recordings of the area where the accident in the above-reference claim occurred for the twenty-four hour period following the incident; and
7. Any other item of evidence related to the above-referenced claim and your defenses to it.



STOY LAW GROUP

8. Footage from all CCTV/security/surveillance cameras in the interior/exterior of the subject location from the date of the subject incident on which Plaintiff was depicted/captured;

Further, please accept this as my formal request to gain access to any documents, including, but not limited to, an incident report, a complete copy of the investigation file as well as employee statements collected by you for this incident for the purposes of an inspection including taking photographs and measurements. Please contact me upon receipt of this letter to discuss a convenient time for this prompt inspection. You are respectfully instructed not to conduct any maintenance, repairs, or make any modifications, alterations, or changes to the property damage prior to this inspection. You are also respectfully requested not to dispose of any remains of the property damage. Failure to comply with this request will be considered spoliation and destruction of evidence in this claim.

It is also my understanding that a video captured the incident involving my client. This is my formal request that you retain said video and forward a copy to me. Failure to comply with this request will be considered spoliation and destruction of evidence in this claim.

Now that you are on notice of my client's claims, you're under a legal duty to preserve all evidence related to this incident. If you fail to preserve the requested items, a Court may very well find that you have spoliated and destroyed evidence, which can have damaging legal consequences. Hence, if you have any questions about whether you need to preserve something, I would urge you to preserve it and to, at a minimum, contact me well in advance of any scheduled destruction or alteration so that we may discuss the issue.

Thank you for your kind and prompt attention in this regard.

Best Regards,

J. Robert Hudson, Jr.

JRH/ys

25-011



CITATION SMALL CLAIMS

NO. 25-NSC02-0023

Darrell Singleton
PLAINTIFF
VS.
GALVESTON POLICE DEPT.
601 54TH STREET
GALVESTON TX 77551

* IN THE JUSTICE COURT
*
*
* PRECINCT 2
*
*
* GALVESTON COUNTY, TEXAS

THE STATE OF TEXAS Galveston Police Dept., **DEFENDANT**, in the hereinafter-styled and numbered cause:

You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14th day after the day you were served with these papers. If the 14th day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14th day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult Part V of the Texas Rules of Civil Procedure, which is available online and also at the court listed on this citation.

This citation is issued pursuant to a petition filed by the above-named plaintiff on the 11th day of February, 2025. The plaintiff's attorney's name and address are, , No Known Address or the plaintiff's address (if they have no attorney), is [REDACTED] Texas City TX 77591 Your answer may be filed with this court, located at 1922 Sealy, Galveston, TX 77550.

ISSUED on this the 12th day of February, 2025.



[Handwritten Signature]

JUSTICE OF THE PEACE
PRECINCT 2
GALVESTON COUNTY, TEXAS

Justice of the Peace, Pct. 2
1922 Sealy
Galveston, TX 77550
(409) 766-2250

2-13-25

Constable Derreck W. Rose
Galveston County PCT 3
600 59th St. 1st Floor
Galveston, TX 77551

[Handwritten Signature]

DARRELL SINGLETON
PLAINTIFF
VS.
GALVESTON POLICE DEPT.
DEFENDANT

*
*
*
*
*

IN THE JUSTICE COURT
JP2
GALVESTON COUNTY, TEXAS

RETURN ON CITATION

RULE 501.2(b). METHOD OF SERVICE. Citation must be served by: (1) delivering a copy of the citation with a copy of the petition attached to the defendant in person, after endorsing the date of delivery on the citation; or (2) mailing a copy of the citation with a copy of the petition attached to the defendant by registered or certified mail, restricted delivery, with return receipt or electronic return receipt requested.

RULE 501.2(e). ALTERNATE SERVICE OF CITATION. If the methods under (b) are insufficient to serve the defendant, the plaintiff, or the constable, sheriff, process server certified under order of the Supreme Court, or other person authorized to serve process, may make a request for alternative service. This request must include a sworn statement describing the methods attempted under (b) and station the defendant's usual place of business or residence, or other place where the defendant can probably be found.

Came to hand on the _____ day of _____, A.D., 20____, at _____, _____.M., and executed by me on the _____ day of _____, A.D., 20____ at _____, _____.M., *by delivering this citation to the within named defendant, _____ at _____ in _____ County, _____, by leaving a copy of this with _____ a person over sixteen years of age, at the usual place of abode defendant.

I actually and necessarily traveled _____ miles in the service of this citation.

Fees:
ServingCop....\$ _____
Mileage.....\$ _____
Total.....\$ _____

Constable _____
Precinct _____
County, _____
Deputy Constable _____

Justice of the Peace, Pct. JP2
1922 Sealy
Galveston, TX 77550
(409) 766-2250

PETITION: SMALL CLAIMS CASE

CASE NO. 25-HS102-0023

In the Justice Court, Precinct 2, Galveston County, Texas

PLAINTIFF Darrell Singleton

Received

FEB 11 2025

VS.

DEFENDANT(S): Galveston Police Dept.

Justice of the Peace
Precinct 2
Galveston County Texas

Defendant(s) address: 601 54th Galveston, Tx. 77550

COMPLAINT: The basis for the claim which entitles the plaintiff to seek relief against the defendant is:

I was excessively beaten and assaulted by multiple police officers. They sprayed me with pepper spray as well in front of my children. I was kned in the growing and my eyes were burning for days. I was hurt for days. I was illegally detained and arrested. Falsely imprisoned and the video proved so.

RELIEF: Plaintiff seeks damages in the amount of \$ 10,000, and/or return of personal property as described as follows (be specific): N/A, which has a value of \$ 0.

Additionally, plaintiff seeks the following: N/A

SERVICE OF CITATION: Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other addresses where the defendant(s) may be served are:

If you wish to give your consent for the answer and any other motions or pleadings to be sent to your email address, please check this box and provide your valid email address: [REDACTED]

Darrell Singleton
Petitioner's Printed Name

[Signature]
Signature of Plaintiff or Attorney

[REDACTED]
Address of Plaintiff's Attorney, if any, or Plaintiff if none

[REDACTED]
City State Zip

[REDACTED]
Phone & Fax No. of Plaintiff's Attorney, if any, or Plaintiff if none

DEFENDANT(S) INFORMATION (if known):

DATE OF BIRTH: _____

DEFENDANT'S PHONE NUMBER: _____

*LAST 3 NUMBERS OF DRIVER LICENSE: _____

*LAST 3 NUMBERS OF SOCIAL SECURITY: _____