

No. 2011-76724

Harris County, Texas, <i>Plaintiff,</i>	§	IN THE DISTRICT COURT OF
	§	
The State of Texas, acting by and through the	§	
Texas Commission on Environmental	§	
Quality, <i>A Necessary and Indispensable</i>	§	
<i>Party</i>	§	
	§	
vs.	§	HARRIS COUNTY, TEXAS
	§	
International Paper Company,	§	
McGinnes Industrial Maintenance	§	
Corporation, Waste Management, Inc.	§	
and Waste Management of Texas, Inc.,	§	
	§	
	§	
<i>Defendants.</i>	§	295 th JUDICIAL DISTRICT

**PLAINTIFF HARRIS COUNTY'S
MOTION FOR PREFERENTIAL TRIAL SETTING**

Plaintiff Harris County, Texas requests that this Court set this case for a preferential trial setting on April 15, 2013.

I. Introduction

Harris County filed this suit because Defendants caused, suffered, or allowed dioxin and other pollutants to contaminate the San Jacinto River, poisoning the environment and the seafood being consumed by the unknowing citizens of Harris County. This case was originally filed in December 2011, and is currently scheduled for trial on April 15, 2013. Harris County requests that this Court set this case for a preferential trial setting on that date to further the public's compelling interest in an expedited resolution of this serious matter of public health and safety.

Harris County has discovered that portions of the public are not fully informed about the fishing and consumption ban in the San Jacinto River as a result of Defendants' pollution of the river, and that people are continuing to consume the affected species of seafood, as well as

disseminating it into the food chain. Information recently obtained from the Texas Parks & Wildlife game wardens who physically patrol the Site area demonstrate that seafood from the Site area continues to be harvested, with some destined for commercial sale and ultimate consumption by humans, despite the fishing and consumption ban. In one of the most recently documented incidents raising grave concern for human health and public safety, a fisherman was caught with seafood from the Site area bound for sale to the wider general public. As explained more fully below and based upon the attached Affidavit of Captain Frederick Ruiz -- Game Warden for the Law Enforcement Division of the Texas Parks & Wildlife -- it is extremely important and in the public interest to ensure that this trial date is secured by a preferential setting.¹

Harris County plans on using a portion of the penalties it recovers in this matter, should it do so, to educate the public and supplement law enforcement activities to further prevent the men, women, and children of Harris County from continuing to poison themselves by eating the contaminated fish and shellfish in and around the San Jacinto River Waste Pits Site (“the Site”). Granting a preferential trial setting on the April 15, 2013 date will ensure the expedited resolution of this serious, time-critical matter and provide the public with more ready access to the penalty funds, if any, to support public education and increased law enforcement activities needed to protect humans from exposure to Defendants’ dioxin.

¹ A copy of the October 22, 2012 Affidavit of Frederick G. Ruiz, Captain, Game Warden, for the Law Enforcement Division of the Texas Parks & Wildlife is attached as Exhibit A.

II. Argument and Authorities.

A. Defendants poisoned the San Jacinto River and violated the law.

On September 3, 1965, Defendant McGinnes Industrial Maintenance Company (“MIMC”) was formed.² Ten days later, MIMC (now merged into the Waste Management of Texas, Inc. family of companies and doing business in Texas as Waste Management) acquired an exclusive waste disposal contract to dispose of waste from the Champion paper mill in Pasadena, Texas.³ While Champion (now Defendant International Paper) made money by selling its paper, its paper mill produced an undesirable and dangerous by-product — 2,3,7,8-TCDD (dioxin) — and other types of dioxin and other pollutants that Champion sought to get rid of. Champion contracted with MIMC to have its paper mill waste containing dioxin and these other pollutants dumped into ponds built by MIMC located in an area near where the Interstate Highway 10 Bridge crosses over the San Jacinto River, east of the City of Houston between the areas known as Channelview and Highlands, Texas (the “Site”).⁴

As reflected in the aerial photographs from the time, MIMC constructed its waste ponds so that they were directly adjacent to, and jutting out into, the San Jacinto River.⁵ Records indicate that the waste ponds were frequently inundated by the river. In addition to the fact that the dioxin waste seeped from the ponds into the San Jacinto River, records show that liquid waste was also intentionally pumped out of one of the ponds at the Site, directly into the San

² A copy of the Articles of Incorporation of MIMC are attached as Exhibit B.

³ A copy of the Contract between MIMC and Champion International in which MIMC assumed the waste disposal contract of Ollie Peterson and Company is attached as Exhibit C.

⁴ A copy of the aerial photographs and EPA site map are attached as Exhibit D.

⁵ See Exhibit D.

Jacinto River.⁶ MIMC and Champion were ordered to stop discharging waste from the ponds into the San Jacinto River, though subsequent records show that wastes continued to seep from the ponds and the pond levees deteriorated, causing continuous releases of dioxin over the following years and decades.

Ultimately, MIMC's owners voted to intentionally abandon the leaking ponds full of their toxic wastes so that they could simply walk away,⁷ and Defendants left their dioxin unattended and unprotected, causing and allowing the 2,3,7,8-TCDD to quietly seep and migrate even further into the environment. This abandonment caused parts of the waste ponds full of dioxin to become submerged below the San Jacinto River's water surface allowing continuous releases of the dioxin into the water. Aerial photographs show the Site being submerged under the waters of the San Jacinto River.⁸ The Defendants' inaction and failure to take care of the wastes dumped into the ponds resulted in their dioxin being released and discharged directly and continuously into the River for more than the 40 years at issue in this suit. During the relevant time, the Defendants neglected to take any action to protect the citizens and resources of Harris County from the dioxin and other pollutants being released into the San Jacinto River where residents were known to swim, eat fish and crabs, and recreate with their families and children.

Many decades later, various watershed studies being conducted by Texas state agencies collected startling data showing that fish and shellfish tissue samples taken in the San Jacinto River contained unusually high dioxin concentrations and exceeded the health-based standard in

⁶ Attached as Exhibit E, is a letter dated December 27, 1965 from the Harris County Health Department ordering MIMC and Champion to stop discharging "black liquor" from the waste ponds into the San Jacinto River.

⁷ Attached as Exhibit F is a copy of the August 19, 1968 Minutes of the Special Meeting of the Board of Directors of McGinnes Industrial Maintenance Corporation in which they voted to abandon the Site.

⁸ See Exhibit D.

97% of fish samples and in 95% of the crab samples.⁹ Further testing and chemical analysis confirms that both human and ecological health are threatened by releases of dioxin that originated at the Site and that Defendants' dioxin continues to release in the San Jacinto River.

In 2008, at the urging of Harris County and others, the San Jacinto River Site was ultimately placed on the National Priorities List for Superfund Sites. Harris County has filed this lawsuit to assess civil penalties under state law against Defendants for violations of the Texas Water Code, the Texas Solid Waste Disposal Act, and the State regulations promulgated pursuant to those statutes. See Plaintiff Harris County's Second Amended Petition filed on October 11, 2012.

B. EPA reports establish that Defendants' dioxin released into the San Jacinto River for years.

There is no real dispute that MIMC deposited waste from the Champion Paper Mill at the Site. There is also no real dispute that the waste deposited at the Site contained hazardous pollutants and dioxin, nor is there any real dispute that between the time the decision was made to abandon the Site in August 1968¹⁰ through April 2008, Defendants took no action to protect the public from the ongoing discharge of hazardous pollutants from the Site into the San Jacinto River. They also took no action to warn the public about the consequences of their actions, abandonment, inaction and silence.

There is also no dispute that EPA has documented that both human and ecological health is threatened by releases of hazardous substances from the Site. In early 2010, EPA conducted an inspection of the Site and issued a memorandum titled "Request for a Time Critical Removal

⁹ See, EPA Findings of Fact, Exhibit G, para. 19, Unilateral Administrative Order.

¹⁰ See Exhibit F.

Action at the San Jacinto River Waste Pits Site, Harris County, Texas” (“Time Critical Action Memo”).¹¹ In this memorandum EPA stated:

- “A recent site visit by EPA Remedial Project Managers Leos and Tzhone on Monday March 1, 2010, documented grayish waste entering the San Jacinto River along the Northwest corner of the site from waste pond 1.... In addition, 95% of Waste pond #2 was observed to be under four feet of water. Waste pond 2 consisting of two surface impoundments is **continually inundated by the San Jacinto River and contaminated sediment within the source area and is in direct contact with the river water as documented in the December 1987, December 1989, February 1992, April 1998, June 1999, May 2002, February 2003, and April 2005 aerial photographs of the Tract.**” (emphasis added)
- **“There is no containment to prevent the migration of hazardous substances from the waste ponds into the San Jacinto River.”**¹² Chemical analysis confirms that dioxin and dibenzofuran contaminants are entering the San Jacinto River. Chemical Analysis documented the presence of numerous dioxin congeners in the source sediments.” (emphasis added)

While Defendants have made many statements regarding the prosecution of this matter, they have not disputed that Champion paper mill waste contaminated the San Jacinto River with dioxin from the Site. EPA’s Time Critical Action Memo found that “both human and ecological health is threatened by releases of hazardous substances from the Tract [Site].” EPA also found that “ecological health is also threatened by bioaccumulation of hazardous substances released from the north tract/source area [at the Site] *at every level of the food chain.*” (emphasis added).

¹¹ Attached as Exhibit H is EPA’s April 2, 2010 Memorandum entitled “Request for Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas.”

¹² Although EPA ultimately required MIMC and International Paper to place a temporary cap over waste at the Site in an effort to contain the release of dioxin while studies evaluated the appropriate permanent, long-term remedy, EPA has recently raised significant concerns over the integrity of the Defendants’ temporary cap. On July 31, 2012, EPA documented its issues regarding the cap’s structural stability, noting that “it is EPA’s position that the observations [about the cap stability] listed above have increased potential threats to human health and the environment” and requiring that MIMC and International Paper “submit a detailed report discussing the failure of the western cap.” Attached as Exhibit I is a copy of EPA’s July 31, 2012 letter to MIMC and International Paper. As recently as October 10, 2012, EPA again questioned MIMC and International Paper about erosion along the entire length of the western berm and other problems associated with the temporary cap EPA required Defendants to construct in an effort to contain their dioxin from continually releasing into the San Jacinto River. EPA’s October 10, 2012, letter advised Defendants that a third-party (the U.S. Corps of Engineers) would be reviewing the Defendants’ cap design and construction in connection with concerns about the integrity of the temporary site cap. Attached as Exhibit J is a copy of EPA’s October 10, 2012 letter to MIMC and International Paper.

C. The dioxin from the Site is a continuing hazard to public health and the environment.

The toxic effects of dioxin are well established in the scientific literature.¹³ According to the EPA, it “considers dioxin to be highly toxic and dioxin is a listed hazardous substance.” Exhibit H. EPA has also stated with regard to the Site that “[s]tudies have shown that exposure to dioxins at high enough doses may cause a number of adverse health effects.” Exhibit H, Time Critical Action Memo, p. 7. The U.S. Department of Health and Human Services has determined that 2,3,7,8-TCDD (the dioxin at issue in this case) may reasonably be anticipated to cause cancer and the World Health Organization has determined that 2,3,7,8-TCDD is a human carcinogen. The documented health effects from exposure of animals to dioxin include death, weight loss, liver damage, disruption of the endocrine system, weakening of the immune system, miscarriages, birth defects, kidney defects, and skeletal abnormalities. Exhibit H, Time Critical Action Memo, p. 7. According to EPA, changes in blood and urine that may indicate liver damage also are seen in people, as well as the severe skin disease with lesions that occur mainly on the face and upper body of humans, known as chloracne. *Id.* The TCEQ and others have warned the public that “dioxin causes a variety of harmful health effects including cancer, birth defects, diabetes, learning and developmental delays, and immune system abnormalities”.¹⁴

¹³ According to EPA, Defendants held a conference call with EPA on September 16, 2010 and took the position that “there are minimal health effects from dioxin and that dioxin is not bad for human consumption.” EPA disagreed with Defendants’ claim, which runs counter to the overwhelming weight of scientific evidence. Attached as Exhibit K, is a letter dated October 4, 2010 from the United States Environmental Protection Agency to Albert R. Axe, counsel for MIMC. It remains to be determined what position Defendants will now take in this matter about the health effects of dioxin. Mr. Axe continues to appear at court in this case representing Defendant MIMC.

¹⁴ See Exhibit L, “Dioxin For Dinner? Why Catfish & Blue Crab Can Be Harmful To Your Health”, from the TCEQ and Houston-Galveston Area Council.

The Agency for Toxic Substances and Disease Registry (“ASTDR”) issued a Public Health Assessment for the San Jacinto River Waste Pits and made the following conclusions about the Site:

- Frequent and/or regular sediment exposures by mouth and/or through skin contact with sediments from the [Site] for both adults and children for periods of 1 year or longer could harm people’s health by increasing theoretical risks for cancer and non-cancer adverse health effects.
- Consumption of fish or crabs caught near the [Site] for periods of one year or longer could harm people’s health by increasing theoretical risks for cancer.

A copy of the relevant portions of ATSDR’s Public Health Assessment Public Comment Draft for San Jacinto River Waste Pits, Channelview, Harris County, Texas is attached as Exhibit M, p.

8. Another study has made the following conclusions regarding the dioxin released from the Site:

- “The fact that measurable concentrations of [dioxin and furans] were found in both San Jacinto River sediment and in aquatic life samples collected in the river near the San Jacinto River Waste Pits in September 2011 strongly suggests that the waste pits have been and are still a source of dioxin and furan contamination of the San Jacinto River. This conclusion is in agreement with the view of the Texas Department of Health as cited in the ATSDR Public Health Assessment which stated, ‘ . . . the waste pits are thought to be a contributing source of the elevated levels of dioxins found in fish, crabs, and sediments in the [San Jacinto River], [Houston Ship Channel], and [Upper Galveston Bay.]’”
- “Wading, swimming, fishing, crabbing, and collecting oysters and clams in the San Jacinto River in proximity to the San Jacinto Waste Pits should be banned. Consumption of fish, crabs, oysters, and clams caught in proximity to the [Site] among vulnerable or at-risk populations, such [as] pregnant women, infants, children, the elderly, persons with impaired liver function, and among individuals with impaired immune system should be prohibited.”

A copy of The Impact of the San Jacinto River Waste Pits on the Environment, Part I., Assessment of San Jacinto River Sediment and Aquatic Life in Proximity to the Waste Pits: A Preliminary Report by Stephen King, Ph. D, M.P.H. is attached as Exhibit N, pp. 15-16.

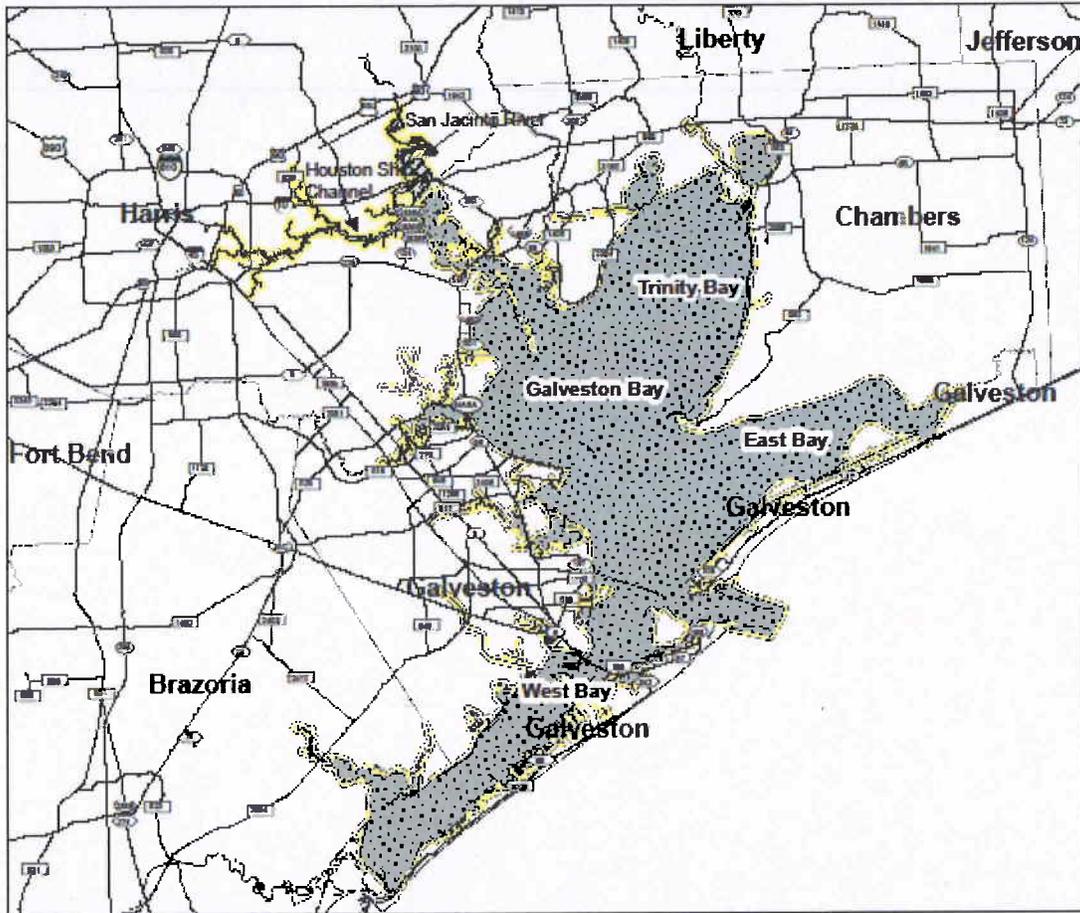
Since 1990, the Texas Department of Health has issued fish and seafood advisories against consuming certain species of aquatic life because of dioxin from the Site. A copy of the Texas Department of Health Fish and Shellfish Consumption Advisory from 1990 and 2008 are attached as Exhibit O and P. The following map shows the Fish and Shellfish Consumption Advisories in effect for the San Jacinto River, the Upper and Lower Galveston Bay, and the contiguous waters:

Houston Ship Channel and Galveston Bay

Brazoria, Chambers, Galveston, and Harris Counties

ADV-20 Issued October 9, 2001

ADV-35 Issued July 8, 2008



Advisory Areas:

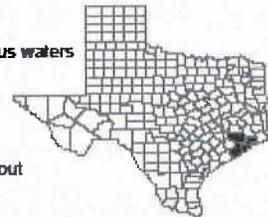
-  **Houston Ship Channel**
The Houston Ship Channel upstream of the Lynchburg Ferry crossing and all contiguous waters, including the San Jacinto River below the U.S. Highway 90 bridge.
-  **Galveston Bay**
Galveston Bay including Chocolate Bay, East Bay, Trinity Bay, and West Bay and contiguous waters

Contaminants of Concern:

-  Dioxin, organochlorine pesticides, and PCBs
-  Dioxin and PCBs

Species Affected:

-  All species of fish
-  All catfish species and spotted seatrout



Consumption Advice:

-  Persons should limit consumption of all species of fish from this area to no more than one eight-ounce meal per month. Women who are nursing, pregnant, or who may become pregnant and children under 12 should not consume any species of fish from these waters.
-  Persons should limit consumption of catfish and spotted seatrout from this area to no more than one eight-ounce meal per month. Women who are nursing, pregnant, or who may become pregnant and children under 12 should not consume catfish or spotted seatrout.

State and local agencies have also devoted their scarce resources to try to assist educating the public about the dioxin to which people are exposed when they eat fish and blue crab from the San Jacinto River.¹⁵ The TCEQ and Houston-Galveston Area Council have published and distributed educational pamphlets, including one entitled “Dioxin for Dinner? Why Catfish & Blue Crab Can be Harmful to Your Health.” Despite these warnings, it appears that Harris County residents may be having dioxin for dinner – whether they know it or not.

D. This Court should grant a preferential trial setting because of the compelling public interest to obtain a prompt resolution of this case.

It has become increasingly evident that the public is not fully informed regarding the fishing and consumption ban in effect for the San Jacinto River, and people are consuming the restricted species of fish for subsistence and for potential sale to the wholesale market where it could land on anyone’s dinner table. In one of the most recently documented incidents, one that raises grave concern for human health and public safety, a fisherman was caught with seafood from the Site area that was destined for sale to the wider public. Because of such continued incidents, State and local governments and agencies recognize first-hand that there is a need to increase local educational efforts as well as stepped-up patrols to protect the public. Harris County intends to use part of the proceeds from this penalty action to provide further education to the public about the dangers of consuming the restricted fish and to assist Texas Parks & Wildlife in enforcing the fish consumption bans. Harris County, therefore, requests that this Court grant it a preferential trial setting no later than the existing setting of April 15, 2013. Granting a preferential trial setting on that date will ensure the compelling need to resolve this

¹⁵ See, “Are You Eating Fish & Blue Crab from the San Jacinto River?” a publication of the Texas Department of State Health Services Health Assessment & Toxicology Group; “Dioxin for Dinner? Why Catfish & Blue Crab Can Be Harmful To Your Health,” a publication of the TCEQ and the Houston-Galveston Area Council, attached as Exhibit L.

case promptly and provide the public with more ready access to the penalty funds, if any, to permit Harris County to support public education and law enforcement that are indisputably needed to protect the men, women and children of Harris County.

Frederick G. Ruiz who is a Captain, Game Warden, for the Law Enforcement Division of the Texas Parks & Wildlife who works in the San Jacinto River Waste Pits area testified as follows:

1. My name is Fred Ruiz. I am over 18 years of age, of sound mind and am qualified to make this Affidavit. All statements made in this Affidavit are within my personal knowledge, and they are true and correct.
2. I am a Captain, Game Warden, for the Law Enforcement Division of the Texas Parks & Wildlife and work in Harris County, Texas. I am very familiar with the San Jacinto River, including the San Jacinto Waste Pits area. I am in charge of patrolling the San Jacinto River, including the area near the San Jacinto Waste Pits, because the San Jacinto River is one of the Parks & Wildlife Department's enforcement priorities due to public safety issues.
3. Public safety is my number 1 priority and people fishing in the area near the San Jacinto Waste Pits or catching fish or harvesting shellfish impacted from the Waste Pit are subject to a public health threat associated with dioxin from the Waste Pits.
4. From my years of personal experience patrolling the River near the San Jacinto Waste Pits, I have personal knowledge that people come from all over to fish in that area. It is a popular fishing area and people fish in that area almost daily. The biggest users of the River near the Waste Pits are the bank fishermen and it is clear that many of them are subsistence fishing and use the fish they catch to feed their families.
5. It is also evident that some fish are caught or shellfish are harvested from the impacted areas of the San Jacinto River for sale to the public, even though that is prohibited. Recently, I personally detained a Vietnamese fisherman with multiple crates of clams being harvested from the San Jacinto River. It was clear that the seafood being harvested was destined for commercial sale and ultimate consumption by humans.
6. Although my game wardens have increased their patrols on the San Jacinto River to try to stop subsistence fishermen and others from catching and consuming fish impacted by the dioxin, there are only 10 game wardens in Harris County. Due to lack of manpower and funds, it is difficult to adequately police the area to ensure

that the public is protected. Dedicated patrols are needed to address this public health threat.

7. In addition, there is a language and cultural barrier that makes it difficult to educate and warn the public not to consume fish from the San Jacinto Waste Pits area. It is clear that public health threats warrant a step up in patrols and enforcement of the fishing bans to ensure the safety of the people of Harris County. However, there is not sufficient funding for the increased man hours, fuel costs, vessels and costs associated with increased patrols.
8. Additional resources are also needed to step up educational efforts and it is my opinion that commercials in Spanish aired on local television stations would reach many people at risk who are not currently aware of the danger to themselves and their children by ingestion of seafood from the San Jacinto Waste Pits areas and areas upstream where fish migrate – in some cases, 8 miles away to the Lake Houston Dam or out to Galveston Bay. Outreach to local schools would also educate children, who would communicate the dangers to their parents who may not be native English speakers. Up until now, the handouts made available to the community have only been in English.
9. Multi-language handouts distributed to schools, bait shops, fishing licensing facilities and other public areas where those at risk are likely to see the warnings would help to educate the community. Funds are needed to help the game wardens and other public officials educate the people of Harris County against the public health threat associated with dioxin-contaminated fish and shellfish in the San Jacinto River and other areas where impacted fish have migrated.
10. Based upon my personal experience, people fishing and consuming fish and shellfish from the San Jacinto River have been exposed to dioxin-contaminated fish for many years through their consumption of fish and shellfish from fishing and continue to be exposed to the dioxin-contaminated fish every day.

See Captain Ruiz's Affidavit of October 22, 2012 attached as Exhibit A. Because of the serious and time-critical public health and safety considerations that are raised in this case, Harris County requests that this Court exercise its discretion regarding its April 15, 2013 trial docket and set this case first on that docket preferentially.¹⁶

¹⁶ Currently, there are only six cases ahead of this matter according to the Harris County District Court's website for the 295th District Court of Harris County, Texas. In the normal course of events, several of those six cases would be expected to either settle or be continued, and as a result, Harris County's request to be set first and preferentially on April 15, 2013, will not have a significant effect on the Court's existing trial docket.

For all these reasons Plaintiff Harris County requests that this Court set the existing April 15, 2013 trial setting as a number one and preferential trial setting and such other and further relief to which it is justly entitled.

Respectfully submitted,

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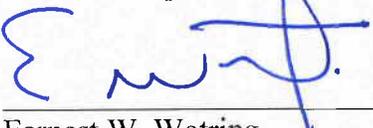
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CERTIFICATE OF CONFERENCE

I have communicated with counsel for Defendants via email on October 25, 2012, and Defendants MIMC and International Paper were opposed to the relief requested in this motion.



Earnest W. Wotring

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument is being served upon all counsel of record via certified mail, return receipt requested, on October 25, 2012.

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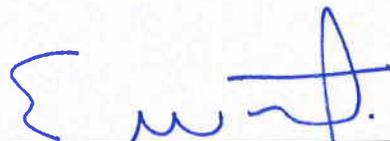
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Texas Commission on Environmental
Quality



Ernest W. Wotring



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this October 26, 2012

Certified Document Number: 53757457 Total Pages: 15

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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