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CITY OF HOUSTON

IN THE DISTRICT COURT OF

VS.

HARRIS COUNTY TEXAS

URMILA NATVERLAL PATEL D/B/A  
EL RONDO MOTOR LODGE; AND  
THE PREMISES LOCATED AT 8016/8020  
8020 LIVINGSTON STREET, HOUSTON  
HARRIS COUNTY, TEXAS

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157TH JUDICIAL DISTRICT

**AGREED ORDER ON TEMPORARY INJUNCTION**

Pending before the Court is Plaintiff, the City of Houston's (the "City") and Defendants Urmila Natverlal Patel d/b/a El Rondo Motor Lodge and the Premises Located at 8016/8020 Livingston Street, Houston, Harris County, Texas' (collectively "the El Rondo") motion for entry of an agreed temporary injunction.

The parties have agreed to the following order on temporary injunction in lieu of an evidentiary hearing. The Court hereby ORDERS the El Rondo to implement the following reasonable measures to prevent the use or maintenance of this property as a nuisance;

- (1) The El Rondo shall not rent rooms in increments of less than eight (8) hours and shall post a large, visible sign at the motel office that states "no hourly rentals."
- (2) The El Rondo shall not sell condoms.
- (3) The El Rondo shall maintain the following video surveillance of its premises:
  - (a) maintain the existing fourteen (14) color surveillance cameras on the premises displaying the date and time including the following:
    - (1) one camera at the motel office in a position to capture the faces of renters and guests in full frame
    - (2) one camera pointed at the motel entrance/exit in a position to capture all persons or vehicles entering or leaving the motel property

**FILED**  
Loren Jackson  
District Clerk

JAN - 9 2009  
Time: 01/09/09  
Harris County, Texas  
By \_\_\_\_\_ Deputy

- (b) maintain existing monitors for the cameras enabling the motel clerks to observe all persons and vehicles entering or leaving the motel premises;
  - (c) maintain the existing recording system to record the camera feeds twenty-four hour (24) hours a day, seven (7) days per week, capable of storing twenty-one (21) days of video from the motel's camera system, and capable of transferring such video to a USB flash drive, portable USB hard drive or DVD;
  - (d) maintain all recordings until the time of trial and make such recordings available for copying to the Houston Police Department on demand;
  - (e) maintain and repair all video surveillance and recording equipment to insure that such equipment is operating at all times.
- (4) The El Rondo shall hire one (1) certified peace officer to monitor and patrol the motel premises.
- (a) The certified peace officers must wear their official uniforms while on duty.
  - (b) The certified peace officer(s) must work a minimum of three (3) days a week for a minimum of four (4) consecutive hours, including
    - (1) one (1) shifts between the hours of 5 p.m. and 1 a.m. on Sunday, Monday, Tuesday, Wednesday, or Thursday;
    - (2) one (1) shift on any day between the hours of 7 a.m. and 5 p.m.; and
    - (3) one (1) shift on Friday or Saturday between the hours of 5 p.m. and 1 a.m.
  - (c) The El Rondo shall provide the City of Houston with the names and contact information for any certified peace officers hired in compliance with this order. Such information may be provided to the City's attorney in this lawsuit by email or otherwise.
- (5) The El Rondo shall require all renters and known guests to register at the motel office. Registration shall include providing a valid drivers' license or other valid government-issued picture identification for each renter and known guest. The El Rondo shall not rent to any person unable to present a driver's license or other valid government-issued picture identification and shall instruct any known guests who are unable or unwilling to produce such identification to leave the motel property. The El Rondo shall make a legible photocopy of the driver licenses presented by all

renters and known guests and shall have each renter and known guest sign a registration form reflecting the current date, current time, room number visiting, expected length of stay. The El Rondo shall also note on the registration form the make, model, and license plate numbers of each renter's and guest's vehicle. All registration forms and copies of driver's licenses or other government-issued picture identification shall be retained by the El Rondo for a period of six (6) months and be produced upon demand to the Houston Police Department.

- (6) The El Rondo shall post the following signs at the front entrance and in the clerk's office, in large, all-capital letters, and in a place clearly visible to all persons in the clerk's office;
- (a) "ALL ROOM RENTERS AND GUESTS ARE REQUIRED TO PROVIDE A VALID, GOVERNMENT-ISSUED PHOTO IDENTIFICATION FOR INSPECTION AND COPYING BY THE EL RONDO MOTOR LODGE."
  - (b) "THIS PROPERTY IS SUBJECT TO CAMERA SURVEILLANCE BY THE HOUSTON POLICE DEPARTMENT."
  - (c) PROSTITUTION AND OTHER ILLEGAL ACTIVITY IS STRICTLY PROHIBITED AT THE EL RONDO MOTOR LODGE. ANY ATTEMPTS TO RENT A ROOM FOR PURPOSES OF PROSTITUTION, DRUG DEALING, OR OTHER CRIMINAL ACTIVITY WILL BE IMMEDIATELY REPORTED TO THE HOUSTON POLICE DEPARTMENT."
  - (d) "ONLY REGISTERED RENTERS & REGISTERED GUESTS MAY BE PRESENT ON MOTEL PREMISES."

At the time of registration the El Rondo shall either orally notify every renter and guest of each of these policies or provide the renter and/or guest with a written copy of these policies. The written copy of these policies may be placed in the motel's rooms.

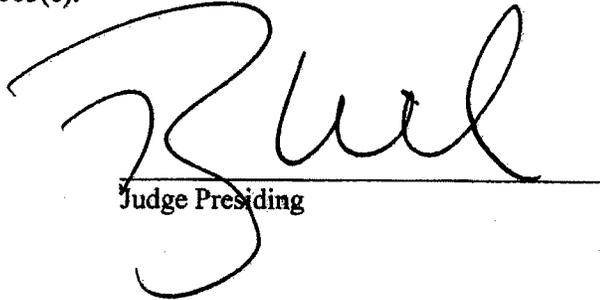
- (7) The El Rondo shall immediately report to the Houston Police Department any attempts to rent a room by a known or suspected prostitute or any male accompanying a known or suspected prostitute, by a known drug dealer or known drug user or by anyone reasonably suspected of having the intent to use the El Rondo for any other criminal activity.
- (8) The El Rondo shall refuse to rent a room if there is a reasonable basis to suspect the room is being rented for purposes of prostitution, drug dealing, drug use, or other criminal activity. The El Rondo shall keep a "prohibited motel renter's & visitor's log" containing the names of any person who has been arrested on motel property and

shall refuse to rent rooms to any person listed in such log. The City of Houston will provide the El Rondo with the names of all persons who have been arrested on motel property within a reasonable time period after such arrest so that El Rondo can accurately maintain the "prohibited motel renter's and visitor's log." In addition, the El Rondo shall immediately notify the Houston Police Department if there is a reasonable basis to suspect that any renter or known guest is engaging in or allowing any illegal activity on motel property, including prostitution or narcotics-related activities.

- (9) If not already on file, the El Rondo shall file a notarized Trespass Affidavit containing all addresses that the property holds, with the Southwest Division located at 8300 Mykawa and shall post a copy of the Trespass Affidavit at the motel office. The El Rondo shall also post "No Trespassing" and "No Loitering" signs throughout the property, including at the motel entrance and motel office and shall enforce such signs by calling the Houston Police Department in the event of any trespassing or loitering.
- (10) The El Rondo shall post in a conspicuous place in each of the lodging units on the premises an operating toll-free telephone number of a nationally recognized information and referral hotline for victims of human trafficking.
- (11) The El Rondo shall post a \$5,000 bond pursuant to TEX. CIV. PRAC. & REM. CODE §125.045(a)-(a-1), or shall make a cash deposit in the Court's registry in lieu of bond. Such bond or cash deposit in lieu of bond will be conditioned on the El Rondo's compliance with all the terms and provisions of this order.
- (12) The El Rondo shall have five (5) days from the date of this Order to implement the above-stated provisions.
- (13) Upon determination by the Court that a violation of this Agreed Temporary Injunction has occurred the Court may in its discretion enter one or more orders as allowed under Chapter 125 of the Texas Civil Practices and Remedies Code including an order:
  - (1) sentencing Defendants for civil contempt as specified in TEX. CIV. PRAC. & REM. CODE § 125.002(d)(1)-(3),
  - (2) pursuant to the provisions of TEX. CIV. PRAC. & REM. CODE § 125.003(a)-(b); and/or
  - (3) for the forfeiture of the bond or cash deposit in lieu of bond pursuant to TEX. CIV. PRAC. & REM. CODE § 125.045(c).

(14) This case is set for trial on the merits on March 30, 2009, as required by TEX. CIV. PRAC. & REM. CODE §125.003(c).

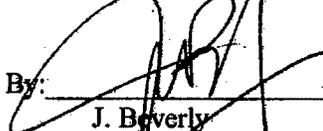
Signed on this day Jan. 9, 2009.



Judge Presiding

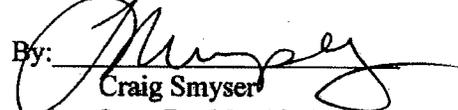
APPROVED:

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