

Cause No. 26-DCV-341122

GEORGE J. WAKILEH	§	IN THE DISTRICT COURT
Plaintiff	§	
	§	
vs.	§	OF FORT BEND COUNTY, TEXAS
	§	
	§	
GRAND LAKES MUNICIPAL UTILITY	§	
DISTRICT # 2	§	
Defendant	§	502 <sup>ND</sup> JUDICIAL DISTRICT

GRAND LAKES MUNICIPAL UTILITY DISTRICT NO. 2'S ANSWER

Now comes Grand Lakes Municipal Utility District No. 2, hereinafter "MUD," and in response to the allegations as set forth in the Original Petition filed by the Plaintiff would show as follows.

I.

The MUD generally denies each and every, all and singular, the allegations set forth in Plaintiff's Original Petition and all amendments thereto, and demands strict proof thereof in accordance with the laws of the State of Texas and the Texas Rules of Civil Procedure.

II.

The MUD is a political subdivision of the State of Texas, is legally authorized to levy, assess and collect ad valorem taxes on property and is entitled to sue and collect delinquent taxes pursuant to the Texas Property Tax Code. The MUD pleads governmental immunity and sovereign immunity. The MUD further pleads that it is not liable for any attorney's fees or costs of this suit.

III.

The Plaintiff alleges that the MUD has improperly levied a collection penalty of twenty percent on delinquent ad valorem tax accounts instead of fifteen percent, the amount in the contract when it was signed in 2002. In fact, a contract amendment was signed in 2003 which allows a

collection penalty of twenty percent for the 2002 and subsequent tax years. The Plaintiff's request for a temporary restraining and temporary injunction should be denied because he cannot show a probable right to recover on the merits and cannot maintain a viable cause of action.

IV.

For these reasons, the Defendant Grand Lakes Municipal Utility District No. 2 prays that a take nothing judgment be granted, that the Plaintiff take nothing by way of his cause, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

PERDUE, BRANDON, FIELDER,  
COLLINS & MOTT, L.L.P.

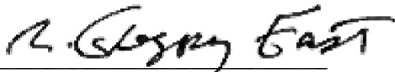


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ATTORNEYS FOR DEFENDANT  
GRAND LAKES MUD NO. 2

CERTIFICATE OF SERVICE

I, R. GREGORY EAST/YOLANDA M. HUMPHREY/RENE E. SANCHEZ, do certify that a true and correct copy of the above instrument was served upon all parties named herein in accordance with Rule 21a T.R.C.P on this the 03/25/2026, 2026.

  
\_\_\_\_\_  
R. GREGORY EAST  
YOLANDA M. HUMPHREY  
RENE E. SANCHEZ

George J. Wakileh, Plaintiff, via email, [george.wakileh@gmail.com](mailto:george.wakileh@gmail.com)

### Automated Certificate of eService

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Joanna Urrutia on behalf of R. East

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Envelope ID: 112870273

Filing Code Description: Answer/Response

Filing Description: Grand Lakes Municipal Utility District No 2's Answer

Status as of 3/26/2026 9:13 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
George J.Wakileh		george.wakileh@gmail.com	3/25/2026 4:25:32 PM	SENT