

PACIFIC COMMERCIAL SERVICES, LLC,
D/B/A COVERALL DALLAS/FT. WORTH,

Plaintiff,

v.

CHELSEA HALL – SOUTHLAKE, LLC, AND
CHELSEA HALL, INC.,

Defendants.

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COUNTY COURT AT LAW NO. 3

TARRANT COUNTY, TEXAS

FILED
TARRANT COUNTY, TEXAS
07/22/2026 1:39PM
MARY LOUISE NICHOLSON
COUNTY CLERK

BY: Turner, LaToya

ORDER FOR TURNOVER AND APPOINTMENT OF RECEIVER

On this day, the Court considered Plaintiff's Ex-Parte Application for Post-Judgment Turnover and Appointment of Receiver. After reviewing the judgment, papers on file, and the evidence, the Court finds that Plaintiff is a judgment creditor of Chelsea Hall – Southlake, LLC and Chelsea Hall, Inc. (collectively, "Judgment Debtor") and Judgment Debtor owns non-exempt property that cannot readily be attached or levied on by ordinary legal process.

The Court further finds that the judgment remains unsatisfied and that Plaintiff is entitled to the Court's aid in reaching non-exempt property of Judgment Debtor to satisfy the judgment. The Court also finds that considering this application without notice to Judgment Debtor was justified.

IT IS, THEREFORE, ORDERED that Tony Savarese (3708 East 29th Street Suite 315, Bryan TX 77802; Email: receiver@xr2.us; Phone: 979-227-7727) is hereby appointed as Receiver pursuant to the Texas Turnover Statute, with the power and authority to take possession of, control, and sell all non-exempt property of the Judgment Debtor, wherever located, and pay the proceeds to Plaintiff to the extent required to satisfy the judgment. Judgment Debtor's nonexempt property includes, but is not limited to:

- Financial accounts, certificates of deposit, and cash;



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- Real property, equipment, vehicles, boats, and aircraft;
- Contract rights, accounts receivable, and business interests;
- Securities and negotiable instruments;
- Safety deposit boxes or vaults;
- Causes of action and intangible property rights;
- Intellectual property rights such as internet domains, patents, copyrights, and trademarks; and
- Digital assets, including cryptocurrency and other blockchain-based assets, whether held in custodial accounts (including accounts held with Coinbase, Inc. or similar providers) or in non-custodial wallets, together with all access credentials, private keys, seed phrases, and recovery information.

All such property is hereby placed in custodia legis of the Receiver as of the date of this Order.

Receiver Authority

IT IS FURTHER ORDERED that, in addition to the general powers and duties set forth in Section 31.002 of the Texas Civil Practice and Remedies Code and Texas Rule of Civil Procedure 679b, the Receiver is specifically authorized to:

- Access and obtain financial records from third-parties, including from any financial institution, bank, credit union, credit bureau, title company, or credit agency.
- Collect accounts receivables and rents;
- Change locks and take all reasonable actions necessary to gain access to non-homestead premises, including storage facilities, safety-deposit boxes, real property, and leased premises.
- Endorse and deposit checks and negotiable instruments (excluding current wages);
- Redirect and open Judgment Debtor's business mail;



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- Hire professionals as reasonably necessary to carry out duties under this Order, provided that the fees for such professionals are subject to Court approval;
- Negotiate installment payment arrangements with Judgment Debtor, provided the Receiver does not compromise the judgment without Plaintiff's consent;
- Use Judgment Debtor's login credentials for Google authenticator, Coinbase, other digital coin brokerages, and cryptocurrencies; and
- Direct Sheriffs, Constables, or other peace officers to assist in the execution of this Order.

Turnover Obligations

IT IS FURTHER ORDERED that Judgment Debtor shall, within five days from receipt of this Order, turn over to the Receiver all non-exempt property described herein, including but not limited to all documents and financial records identified in Exhibit A attached hereto, as well as all interests in any business or venture. Such turnover shall include all agreements, stock certificates, ownership records, and other documents reflecting Judgment Debtor's ownership or interest in any entity or enterprise.

IT IS FURTHER ORDERED that Judgment Debtor shall, until the judgment in this cause is fully satisfied, continuously turn over to the Receiver any non-exempt property acquired after service of this Order within three days of receipt, including all checks, cash, securities, promissory notes, documents of title, and contracts. Paychecks for current wages are exempt from this Order.

Charging Order

IT IS FURTHER ORDERED that this Order constitutes a charging order against any ownership interest held by Judgment Debtor in any partnership, limited liability company, or other entity. The Receiver is entitled to receive any distributions or proceeds to which Judgment Debtor would otherwise be entitled. This order constitutes a lien upon the judgment debtor's partnership



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interest in any partnership and the judgment debtor's membership interest in any limited liability company.

Third-Party Turnover

IT IS FURTHER ORDERED that any third party in possession, custody, or control of non-exempt property of Judgment Debtor shall, upon service of this Order and request by the Receiver, to the extent permitted by applicable law, turn over such property or provide access thereto within a reasonable time, not to exceed ten (10) days absent good cause.

Exempt Property

IT IS FURTHER ORDERED that this Order does not compel the turnover of a natural person's homestead, checks for current wages, or other property specifically exempt under Texas law. The Receiver must comply with Texas Rule of Civil Procedure 679b regarding protected property rights.

Receiver Compensation and Expenses

IT IS FURTHER ORDERED that the Receiver's fee is conditionally set at 25% of all proceeds collected, subject to later approval by the Court as reasonable based on the work performed and results obtained, and shall be taxed as costs against Judgment Debtor. The Receiver may recover reasonable and necessary expenses, subject to Court approval, which shall also be taxed as costs.

Receiver Requirements

IT IS FURTHER ORDERED that the Receiver shall file an oath before acting; provide an accounting of receipts and disbursements upon request or as ordered by the Court; and post a bond if required below.

- [☒] No bond required; or
- [☐] Receiver must execute a good and sufficient bond in the amount of \$ _____ before acting under this Order.



IT IS FURTHER ORDERED that the Receiver must not disburse funds to Plaintiff or sell property within 14 days after serving Judgment Debtor with the Notice of Protected Property Rights, the Instructions for Protected Property Claim Form, and the Protected Property Claim Form approved by the Supreme Court of Texas, or within 17 days if service was by mail. If the Judgment Debtor asserts an exemption, Receiver may only disburse funds to Judgment Creditor or sell property with Judgment Debtor's written consent or a court order.

Attorney's Fees

IT IS FURTHER ORDERED that Plaintiff shall recover from Judgment Debtor \$1,500.00 as reasonable attorney's fees for the presentation of this motion.

Term of Appointment

IT IS FURTHER ORDERED that, unless extended by the Court for good cause, this Receivership terminates 180 days after the date this Order is signed.

Law Enforcement Assistance

IT IS FINALLY ORDERED that all Sheriffs or Constables, and their deputies, and all other peace officers, shall assist the Receiver in carrying out his duties and exercising his powers hereunder and prevent any person from interfering with the Receiver in taking control and possession of the property of Judgment Debtor, without the necessity of a Writ of Execution. The Receiver is authorized to have a writ of execution issued and to direct any Constable or Sheriff to seize and sell property under the writ.

SO ORDERED on: _____.

Signed on this day July 22, 2026



HON. MIKE HRABAL, PRESIDING



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Case Contacts

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A CERTIFIED COPY,
ATTEST: 23rd July, 2026
MARY LOUISE NICHOLSON, County Clerk
Tarrant County, Texas
Total # of Pages: 61
BY: [Signature] Deputy