

From: [Matt Mills](#)
To: [Nannette Samuelson](#)
Subject: Re: July 4 parade - Marathon Digital Complaint
Date: Tuesday, April 16, 2024 11:51:08 AM

They should keep calling different lawyers. They probably asked someone at a top level for their price, but just getting someone competent to file the papers and get the case in front of a courtroom is the main thing here. Just my thought.

Matthew A. Mills
Hood County Attorney
Ph: 817 579-3216
Fx: 817 579-3218

From: Nannette Samuelson <NSamuelson@co.hood.tx.us>
Sent: Tuesday, April 16, 2024 11:49 AM
To: Matt Mills <MMills@Co.hood.tx.us>
Subject: Re: July 4 parade - Marathon Digital Complaint

When I asked about that they said the lawyer wanted 80k retainer.
Too much for these folks.

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From: Matt Mills <MMills@Co.hood.tx.us>
Sent: Tuesday, April 16, 2024 8:52 AM
To: Nannette Samuelson <NSamuelson@co.hood.tx.us>
Subject: Re: July 4 parade - Marathon Digital Complaint

Are they ever going to hire a private lawyer and file suit? That's the one obvious solution, and it seems worth it if their livelihoods are being destroyed. We'll do our best with the citations though.

Matthew A. Mills
Hood County Attorney
Ph: 817 579-3216
Fx: 817 579-3218

From: Nannette Samuelson <NSamuelson@co.hood.tx.us>
Sent: Monday, April 15, 2024 5:55 PM
To: Matt Mills <MMills@Co.hood.tx.us>; Jay Quine <jquine@co.hood.tx.us>; John Shirley <jshirley@co.hood.tx.us>
Subject: Fw: July 4 parade - Marathon Digital Complaint

Nannette Samuelson
Hood County Commissioner Pct 2
817-579-3300

From: Tim Harris <[REDACTED]>
Sent: Saturday, April 13, 2024 3:41 PM
To: info@granburychamber.com <info@granburychamber.com>
Cc: Nannette Samuelson <NSamuelson@co.hood.tx.us>
Subject: July 4 parade - Marathon Digital Complaint

Granbury Chamber,

The fan noise to cool the Marathon Digital computers has created a "humanitarian crisis" for the people living in the Mitchell Bend community. Even as far away where I live in Pecan Plantation, the noise at night makes it hard to sleep.

Hood County newspaper has already documented this problem in several issues, as well as several local TV stations.

Marathon should resolve the noise problem before they are allowed to sponsor a parade.

Very disappointed in this decision.

Tim Harris [REDACTED]

From: [Glenn Tilleman](#)
To: [Nannette Samuelson](#); [Matt Mills](#)
Subject: Re: Sound Study
Date: Thursday, July 18, 2024 2:21:09 PM

I just spoke with Nick McCabe at HGC Engineering and he's hoping to have that quote to us tomorrow.

Rega■■s,
Glenn Tilleman
Hood County Purchasing Agent
Ph. 817-408-3440
Fax 817-579-3349
gtilleman@co.hood.tx.us

From: Glenn Tilleman <gtilleman@hoodcounty.texas.gov>
Sent: Tuesday, July 16, 2024 7:36 AM
To: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Matt Mills <mmills@hoodcounty.texas.gov>; Glenn Tilleman <gtilleman@hoodcounty.texas.gov>
Subject: Re: Sound Study

Good morning,
There are two options here. We could pass a discretionary exemption as a professional service, or you could state "declare HGC Engineering to be the most qualified firm and" before the wo■■ hire.

Discuss and take appropriate action to declare HGC Engineering to be the most qualified firm and hire.....

Thank you,
Glenn Tilleman
Hood County Purchasing Agent
Ph. 817-408-3440
Fax 817-579-3349
gtilleman@co.hood.tx.us

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From: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>
Sent: Monday, July 15, 2024 5:48 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Nannette Samuelson

<nsamuelson@hoodcounty.texas.gov>; Glenn Tilleman <gtilleman@hoodcounty.texas.gov>

Subject: Re: Sound Study

Matt,

Don't we have to say something about the LGC that allows us to hire directly?

Glenn, please contact HGC Nick McCabe, MEng, PEng, INCE at 945.219.2947

Mr. McCabe provided a quote to an individual that lives in Mitchell Bend area project number 02400504. For \$5,300.

We would need a quote for the County, or I could state in the motion not to exceed \$6,000.

WWW.hgcacoustics.com

Acoustical Consulting Experts in Noise & Vibration Control

International acoustical consultants with expertise in noise & vibration reduction. Offices in Toronto, Calgary, Montreal and Dallas

www.hgcacoustics.com

Nannette Samuelson
Hood County Commissioner Pct 2
817-579-3300

From: Matt Mills <mmills@hoodcounty.texas.gov>

Sent: Monday, July 15, 2024 4:56 PM

To: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Glenn Tilleman <gtilleman@hoodcounty.texas.gov>

Subject: Re: Sound Study

I think I would leave the LGC off the agenda item and just say something like "Discuss and take appropriate action to hire *** to conduct a sound study regarding the bitcoin plant." Something like that. Would that work?

Matthew A. Mills
Hood County Attorney
Ph: 817 579-3216
Fx: 817 579-3218

From: [Matt Mills](#)
To: [Jack Wilson](#)
Subject: Fw: HGC sound study
Date: Wednesday, December 4, 2024 10:26:53 AM
Attachments: [Hood County - Cryptocurrency Mine Sound Level Investigation.pdf](#)

Matthew A. Mills
Hood County Attorney
Ph: 817 579-3216
Fx: 817 579-3218

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Monday, November 4, 2024 3:51 PM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Fw: HGC sound study

Interesting. Looks like we're done now.

Matthew A. Mills
Hood County Attorney
Ph: 817 579-3216
Fx: 817 579-3218

From: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>
Sent: Monday, November 4, 2024 3:49 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>
Subject: HGC sound study

Matt,
here is the report.

Nannette Samuelson
Hood County Commissioner Pct 2
817-579-3300

From: [Stephanie Cooper](#)
To: [Nannette Samuelson](#); [Matt Mills](#)
Subject: Re: Request to Vacate Officer Regarding Incorporation Petition
Date: Wednesday, August 6, 2025 11:43:10 AM
Attachments: [image001.png](#)

I have not. I've removed myself from speaking with either party due to it being at a legal level now.

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From: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>
Sent: Wednesday, August 6, 2025 11:42:11 AM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Stephanie Cooper <Scooper@hoodcounty.texas.gov>
Subject: Re: Request to Vacate Officer Regarding Incorporation Petition

Have either of you notified the petitioners?

I think that would be a first step to allow them to solve the signature issue if one exists.

Nannette Samuelson
Hood County Commissioner Pct 2
817-579-3300

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Wednesday, August 6, 2025 8:53 AM
To: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Kevin Andrews <KAndrews@hoodcounty.texas.gov>; Jack Wilson <JWilson@hoodcounty.texas.gov>; Dave Eagle <deagle@hoodcounty.texas.gov>
Cc: Stephanie Cooper <Scooper@hoodcounty.texas.gov>
Subject: Fw: Request to Vacate Officer Regarding Incorporation Petition

I just talked to Stephanie about this, and we wanted the rest of the court to be in the loop about this issue. An area in precinct 2 is trying to have an incorporation election, but it appears some of their required signatures are insufficient. However, the judge signed an order months ago to allow them to go forward. The incorporation is being opposed by Marathon, which is located inside this area. Marathon has complained that they weren't notified of the incorporation effort, and found out much later. But now the petitioners (apparently) haven't been notified of the opposition to their petition. The deadline for ballot measures is August 18, I believe. It seems possible that the judge could invalidate the petition on the eve of the deadline, and the petitioners might not have time to correct

From: [Matt Mills](#)
To: [Nannette Samuelson](#); [Stephanie Cooper](#)
Subject: Re: Request to Vacate Officer Regaling Incorporation Petition
Date: Wednesday, August 6, 2025 11:43:59 AM
Attachments: [image001.png](#)

I haven't notified them either. I figured you're probably in touch with them a lot and can relay the message.

From: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>
Sent: Wednesday, August 6, 2025 11:42 AM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Subject: Re: Request to Vacate Officer Regaling Incorporation Petition

Have either of you notified the petitioners?

I think that would be a first step to allow them to solve the signature issue if one exists.

Nannette Samuelson
Hood County Commissioner Pct 2
817-579-3300

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Wednesday, August 6, 2025 8:53 AM
To: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Kevin Andrews <KAndrews@hoodcounty.texas.gov>; Jack Wilson <JWilson@hoodcounty.texas.gov>; Dave Eagle <deagle@hoodcounty.texas.gov>
Cc: Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Subject: Fw: Request to Vacate Officer Regaling Incorporation Petition

I just talked to Stephanie about this, and we wanted the rest of the court to be in the loop about this issue. An area in precinct 2 is trying to have an incorporation election, but it appears some of their required signatures are insufficient. However, the judge signed an order months ago to allow them to go forward. The incorporation is being opposed by Marathon, which is located inside this area. Marathon has complained that they weren't notified of the incorporation effort, and found out much later. But now the petitioners (apparently) haven't been notified of the opposition to their petition. The deadline for ballot measures is August 18, I believe. It seems possible that the judge could invalidate the petition on the eve of the deadline, and the petitioners might not have time to correct anything or add valid signatures. Stephanie and I are in uncharted water with how to proceed from here. Since the judge signed it originally without the court voting on it, I'm

anything or add valid signatures. Stephanie and I are in uncharted water with how to proceed from here. Since the judge signed it originally without the court voting on it, I'm not sure it needs a full court vote to change that. We're still looking into it, but if y'all have resources to sort this out, please let us know.

From: Paula Pendley <Paula.Pendley@nelsonmullins.com>

Sent: Tuesday, August 5, 2025 12:07 PM

To: Ronald Massingill <rmassingill@hoodcounty.texas.gov>; Ronald Massingill <rmassingill@hoodcounty.texas.gov>

Cc: Matt Mills <mmills@hoodcounty.texas.gov>; Stephanie Cooper <SCooper@hoodcounty.texas.gov>; Robert Thackston <robert.thackston@nelsonmullins.com>

Subject: Request to Vacate Order Regarding Incorporation Petition

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Dear Judge Massingill:

We respectfully request that the Court vacate the Order entered on or about May 2, 2025, relating to the proposed incorporation petition filed by residents seeking to form a Type B municipality in Hood County, calling it Mitchell Bend, Texas.

After recently learning of the Order, we conducted diligence into the factual basis for the Petition. We then conferred with both County Attorney Matt Mills on July 22 and 25, and Elections Coordinator Stephanie Cooper on July 25 to determine whether any of the information submitted to the Court had been independently verified as accurate and meeting the requirements pursuant to Texas Local Government Code §7.001 and §8.002. They both confirmed that neither of them participated in verifying the accuracy of the information in the Petition.

We understand the Court relied on representations that the Petition complied with all legal requirements. However, based on our investigation, there appear to be defects on the face of the Petition submitted, including signature deficiencies, inclusion of ineligible territory, and irregularities in the map's configuration under sections §§ 7.001, 7.002, 7.006, 5.901 of the Texas Local Government Code and §11.002 of the Texas Election Code. By way of one example, by our count, the Petition contains at most 42 valid signatures - well short of the 50 signatures required for placement on the ballot under Texas law.

In light of this, we respectfully request that the Court vacate the prior Order approving the Petition and setting aside an election of whether Mitchell Bend, Texas can be incorporated as a Type B Municipality within Hood County.

A proposed Order is attached for the Court's convenience. We are, of course, amenable to a hearing should the Court have any questions or desire input.

Given the significance of this issue and its potential impact on our client, MARA Holdings Inc. and other residents in the proposed area, who were not given notice about this Petition and proposed incorporation, we would appreciate the opportunity to receive notice of any future filings or proceedings concerning the incorporation effort.

Respectfully submitted,



Paula D. Pendley

PDP/tls
Enclosure



PAULA PENDLEY PARTNER

paula.pendley@nelsonmullins.com

3333 LEE PARKWAY | SUITE 750

DALLAS, TX 75219

T 469.484.4770 F 469.828.7217

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From: [Jay Quine](#)
To: [Matt Mills](#)
Subject: Re: Mitchell Bend Paperwork
Date: Thursday, August 7, 2025 3:05:06 PM
Attachments: [Outlook-nmycawrt.png](#)

Good grief! I'll try but have no idea where to look.



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218
AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Thursday, August 7, 2025 11:39 AM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Fw: Mitchell Bend Paperwork

Can you please do some research on this before Tuesday's meeting? The story is that a group in precinct 2 got signatures together to have an election to become a city, presumably to enact ordinances regarding the bitcoin facility. The judge approved their petition three months ago. Marathon didn't know it was going on at the time, but since hired lawyers and investigated the signatures. They've now argued the petition is insufficient. I think they've also complained that the map isn't up to requirements too. Stephanie agrees the signatures are insufficient after further review. The question is what's next. If the judge signed it without commissioners court's approval, how is it now a commissioners court issue to resolve? (It's on the Tuesday agenda.) Who has authority to approve or deny an application? Should it just be in civil court? Also, I believe the deadline for ballot measures is August 18, or thereabouts. If and when the petition is deemed insufficient, do the petitioners have enough time to rectify it? They've thought for the last three months they were good.

I'll send whatever else I have on this for your investigation. Stephanie isn't sure what she should do.

Thanks.

From: [Stephanie Cooper](#)
To: [Matt Mills](#)
Subject: FW: Incorporation of Mitchell Bend
Date: Friday, August 8, 2025 9:31:00 AM

Stephanie Cooper, C.E.R.A.

Elections Administrator
Hood County Elections
1410 W. Pearl St.
Granbury, TX 76048
(817) 408-2525

From: danny lakey <[REDACTED]>
Sent: Friday, August 8, 2025 8:00 AM
To: Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Subject: Incorporation of Mitchell Bend

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Ms. Cooper,

I am certain you have heard that Marathon is causing some issues with our election. In a letter written to Judge Massingill, Marathon claims that the voter signatures we presented to you were never independently verified by you or anyone in Matt Mills office and there were not 50 valid signatures. We know this to be false.

It is true the attorney's office did not verify the signatures, however I know that you verified, very diligently, each and every name and found there to be 50 valid signatures.

Would it be possible for you to send me, or Judge Massingill (both) a short email stating that You did verify the signatures and found the required 50 registered voters supporting the election.

I will be in Commissioners court on Tuesday. Marathon has put an item on the court docket to strike the election. However, I will be arguing:

1. The commissioners court has no standing in this matter. This is a matter for Judge Massingill only

2. Marathon has no standing in the court as this is a matter for the people of Mitchell Bend and Marathon is a FL based company, not a Texas company and any efforts to stop the election could possibly be election interference.

3. The petition to have an election on incorporation was completed, and verified to be valid by the Hood County Elections Administrator.

As this matter should be between The people of Mitchell Bend, Judge Massingill and the Elections Administrator, I would greatly appreciate you letting Judge Massingill that you believe the Election Petition to be valid and should be held the first Tuesday in Nov.

Thank you,

Sincerely,

Daniel S. Lakey

From: [Stephanie Cooper](#)
To: [Jay Quine](#)
Cc: [Matt Mills](#); [Lisa Segovia](#)
Subject: RE: Mitchell Bend Paperwork
Date: Friday, August 8, 2025 8:23:00 AM
Attachments: [image001.png](#)

Hi Allen,

I'm not sure which signatures the group who submitted the letter are referring to. Neither party involved have come to me requesting that I verify the signatures so I'm also unsure of what data they are comparing them to.

Once requested, I will verify the signatures submitted to me.

Thank you,

Stephanie Cooper, C.E.R.A.

Elections Administrator
Hood County Elections
1410 W. Pearl St.
Granbury, TX 76048
(817) 408-2525

From: Jay Quine <jquine@hoodcounty.texas.gov>
Sent: Friday, August 8, 2025 6:15 AM
To: Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Cc: Matt Mills <mmills@hoodcounty.texas.gov>; Lisa Segovia <ls5516@hoodcounty.texas.gov>
Subject: Fw: Mitchell Bend Paperwork

Stephanie

Why do youo think the signatures are insufficient?

Allen



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218
AllenQuine@co.hood.tx.us

From: [Stephanie Cooper](#)
To: [Jay Quine](#); [Matt Mills](#); [Nannette Samuelson](#); [Brenda Lampert](#); [Ronald Massingill](#); [Dave Eagle](#); [Jack Wilson](#); [Kevin Andrews](#)
Subject: RE: Mitchell Bend Paperwork
Date: Friday, August 8, 2025 10:46:00 AM
Attachments: [image001.png](#)

I was speaking with Brenda, and she has to amend the agenda to add something to it. Is it appropriate for this item to be pulled at this point or do we need to wait for Court to pull it?

Thanks,

Stephanie Cooper, C.E.R.A.

Elections Administrator
Hood County Elections
1410 W. Pearl St.
Granbury, TX 76048
(817) 408-2525

From: Jay Quine <jquine@hoodcounty.texas.gov>
Sent: Friday, August 8, 2025 9:57 AM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Brenda Lampert <BLampert@hoodcounty.texas.gov>; Ronald Massingill <rmassingill@hoodcounty.texas.gov>; Dave Eagle <deagle@hoodcounty.texas.gov>; Jack Wilson <JWilson@hoodcounty.texas.gov>; Kevin Andrews <KAndrews@hoodcounty.texas.gov>
Cc: Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Subject: Re: Mitchell Bend Paperwork

That is my conclusion as well.



J. Allen Quine
Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218
AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Matt Mills <mmills@hoodcounty.texas.gov>

Sent: Friday, August 8, 2025 9:54 AM

To: Nannette Samuelson <nsamuelson@hoodcounty.texas.gov>; Brenda Lampert <BLampert@hoodcounty.texas.gov>; Ronald Massingill <rmassingill@hoodcounty.texas.gov>; Dave Eagle <deagle@hoodcounty.texas.gov>; Jack Wilson <JWilson@hoodcounty.texas.gov>; Kevin Andrews <KAndrews@hoodcounty.texas.gov>

Cc: Stephanie Cooper <SCooper@hoodcounty.texas.gov>; Jay Quine <jquine@hoodcounty.texas.gov>

Subject: Mitchell Bend Paperwork

I'm still working through this Mitchell Bend stuff as quickly as possible, working with Stephanie and Allen. I understand when it was placed on the agenda, it was right at our deadline for agenda items, so we would rather be safe than sorry. However, in reviewing the laws a bit more, I think it's just a county judge issue and not a commissioners court issue. One of the leaders of the Mitchell Bend side also made this point to Stephanie in an e-mail, and I believe he is correct. If anyone has different info on this matter, please let me know.

From: [Christine Leftwich](#)
To: [Matt Mills](#); [Jay Quine](#)
Subject: Re: Mitchell Bend issue
Date: Thursday, August 14, 2025 1:17:26 PM
Attachments: [Outlook-jirgurix.png](#)
[Outlook-fzzzscbt.png](#)

Good afternoon, Matt and Allen,

I agree it would not become part of the reco█; I do keep copies of documents citizens provide in my "paper" court folder for that day, but I do not scan them in or make part of the official reco█s. Only the back up documentation for the agenda items are sealed and preserved as PDFs.

His comments will be noted on the minutes I prepare. If the incorporation goes through, that documentation will then be filed in the land/deed reco█s.

Rega█s,

Christine C. Leftwich, M.Ed.

Hood County Clerk

CountyClerk@hoodcounty.texas.gov

www.hoodcounty.texas.gov

Justice Center

1200 W. Pearl St.

Granbury, Texas 76048

817-579-3222 x5621

Annex II Reco█s

201 West Bridge St.

817-579-3222 x6010

Office Mobile 817-559-1758



"Always stand on principle...even if you stand alone." - John Adams

From: Matt Mills <mmills@hoodcounty.texas.gov>

Sent: Thursday, August 14, 2025 12:20 PM

To: Jay Quine <jquine@hoodcounty.texas.gov>; Christine Leftwich
<countyclerk@hoodcounty.texas.gov>

Subject: RE: Mitchell Bend issue

I would say no.

Sent via the Samsung Galaxy S25 Ultra, an AT&T 5G smartphone

----- Original message -----

From: Jay Quine <jquine@hoodcounty.texas.gov>

Date: 8/14/25 12:16 PM (GMT-06:00)

To: Christine Leftwich <countyclerk@hoodcounty.texas.gov>

Cc: Matt Mills <mmills@hoodcounty.texas.gov>

Subject: Mitchell Bend issue

Christine

Mr Lakey would like the packet and his signed petition to be entered into the minutes for the last Commissioners' Court. Is it appropriate even though it was not on the agenda but came up in the open session?

Allen



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218

AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: [Beth Stanley](#)
To: [Matt Mills](#)
Subject: Mitchell Bend
Date: Monday, August 11, 2025 2:31:53 PM
Attachments: [DOC057.pdf](#)

Matt - I have attached the letter the Judge received from Nelson Mullins regarding a request to Vacate the Officer Rega's Incorporation Petition.

The Judge has asked that you forward this to whoever is necessary to be sure that this Officer to Vacate is properly recorded.

Thank you

Best,

Beth

*Beth Stanley
Court Administrator
Hood County Court
Tel: (817) 579-3200
Fax: (817) 579-3213*

From: [Beth Stanley](#)
To: [Matt Mills](#); [Stephanie Cooper](#)
Cc: [Jay Quine](#)
Subject: Mitchell Bend
Date: Tuesday, August 12, 2025 3:15:28 PM
Attachments: [DOC061.pdf](#)
[DOC060.pdf](#)

Matt and Stephanie:

Please see the attached letters from Paula Pendley and Jackson Walker.

The Judge ask that you please note the other objections to the petition that do not relate to the signatures.

Best,

Beth

*Beth Stanley
Court Administrator
Hood County Court
Tel: (817) 579-3200
Fax: (817) 579-3213*

From: [Jay Quine](#)
To: [Beth Stanley](#); [Matt Mills](#); [Stephanie Cooper](#)
Subject: Re: Mitchell Bend
Date: Tuesday, August 12, 2025 3:19:22 PM
Attachments: [Outlook-iwc0nmbq.png](#)

Beth

I've researched the authorities they cite. They are really reaching. Glad to discuss with the Judge.

Allen



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218
AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Beth Stanley <bstanley@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 3:15 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Cc: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Mitchell Bend

Matt and Stephanie:

Please see the attached letters from Paula Pendley and Jackson Walker.

The Judge ask that you please note the other objections to the petition that do not relate to the signatures.

Best,

Beth

Beth Stanley
Court Administrator
Hood County Court
Tel: (817) 579-3200
Fax: (817) 579-3213

From: [Jay Quine](#)
To: [Beth Stanley](#); [Matt Mills](#); [Stephanie Cooper](#)
Subject: Re: Mitchell Bend
Date: Tuesday, August 12, 2025 3:47:42 PM
Attachments: [Outlook-kzfixnlr.png](#)

I'm ready to recommend to the Judge to sign the Order, as are Matt and Stephanie.



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218

AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Beth Stanley <bstanley@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 3:15 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Cc: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Mitchell Bend

Matt and Stephanie:

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Best,

Beth

*Beth Stanley
Court Administrator
Hood County Court
Tel: (817) 579-3200*

From: [Matt Mills](#)
To: [Jay Quine](#)
Subject: FW: Mitchell Bend Incorporation
Date: Tuesday, August 12, 2025 12:07:14 PM
Attachments: [Mitchell bend map full.pdf](#)
[Mitchell bend map.pdf](#)
[Mitchell Bend Map google.pdf](#)
[Incorporation signatures 2.pdf](#)
[Incorporation packet.pdf](#)

Sent via the Samsung Galaxy S25 Ultra, an AT&T 5G smartphone

----- Original message -----

From: danny lakey <[REDACTED]>
Date: 8/12/25 11:21 AM (GMT-06:00)
To: Matt Mills <mmills@hoodcounty.texas.gov>
Subject: Mitchell Bend Incorporation

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Here is a packet and all the data that goes with it.

Danny

From: [Jay Quine](#)
To: [Matt Mills](#)
Subject: Re: Hood Count Civil Public Information Request 8-12-25
Date: Tuesday, August 12, 2025 4:53:40 PM
Attachments: [Outlook-z3ay55sd.png](#)
[Outlook-zfa5e5p5.png](#)

I wrote Beth - copied you. I don't think he signed it yet. I know — time is of the essence!



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218

AllenQuine@co.hood.tx.us

www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 4:52 PM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Re: Hood Count Civil Public Information Request 8-12-25

I'm not sure. Did the judge sign today? We need this sorted out quickly.

From: Jay Quine <jquine@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 4:51 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>
Subject: Re: Hood Count Civil Public Information Request 8-12-25

Lakey left me a copy but kept the originals that he signed. That is the set the Judge should sign. Does he first file it with the County Court like any Petition and Order? I didn't read any requirement but doesn't that make sense?



J. Allen Quine

Assistant Hood County Attorney

817-579-3216 | fax 817-579-3218

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www.co.hood.tx.us

1200 West Pearl St. Granbury, Texas 76048

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 4:44 PM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Fw: Hood Count Civil Public Information Request 8-12-25

Do you know how to answer this?

From: Stephanie Cooper <SCooper@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 4:42 PM
To: Melissa Welborn <mwelborn@hoodcounty.texas.gov>
Cc: Matt Mills <mmills@hoodcounty.texas.gov>
Subject: RE: Hood Count Civil Public Information Request 8-12-25

Hi Melissa,

Attached is what I received from Mr. Lakey today after he left Commissioners Court. I believe that he has signed his portions of the application and left them with either the Judge's office or Mr. Mills. If the signed documents exist, should we use those instead of the copies I have?

I've also attached the new petition pages and a document stating my verification of 59 qualified signatures. Beyond that, I have no authority to say whether the application packet meets all other legal requirements.

Thanks,

Stephanie Cooper, C.E.R.A.

Elections Administrator
Hood County Elections
1410 W. Pearl St.
Granbury, TX 76048
(817) 408-2525

From: Melissa Welborn <mwelborn@hoodcounty.texas.gov>
Sent: Tuesday, August 12, 2025 2:14 PM
To: Stephanie Cooper <SCooper@hoodcounty.texas.gov>

From: [Matt Mills](#)
To: [Jay Quine](#)
Subject: Re: Constellation - Letter to Judge Massingill - August 13 2025
Date: Thursday, August 14, 2025 9:17:35 AM

Do you have any thoughts on this? Also, I'm not sure if you knew this, but Brady Pendleton has been helping the Mitchell Bend group unofficially. I sent this to him for his feedback too. I haven't heard back yet. I talked to him late yesterday.

From: Matt Mills <mmills@hoodcounty.texas.gov>
Sent: Wednesday, August 13, 2025 2:21 PM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Re: Constellation - Letter to Judge Massingill - August 13 2025

Check out *In re Walker*, 683 S.W.3d 400 (Tex. 2024). I think courts would favor having an election unless there's a serious flaw. I realize this case and others have dealt with candidates individually and not areas trying to incorporate, but I think the rationale would hold.

From: Matt Mills
Sent: Wednesday, August 13, 2025 1:29 PM
To: Jay Quine <jquine@hoodcounty.texas.gov>
Subject: FW: Constellation - Letter to Judge Massingill - August 13 2025

Sent via the Samsung Galaxy S25 Ultra, an AT&T 5G smartphone

----- Original message -----

From: "Franco, Maria" <mfranco@jw.com>
Date: 8/13/25 1:03 PM (GMT-06:00)
To: Beth Stanley <bstanley@hoodcounty.texas.gov>, Brenda Lampert <BLampert@hoodcounty.texas.gov>
Cc: "Fischer, Tre" <tfischer@jw.com>, Matt Mills <mmills@hoodcounty.texas.gov>
Subject: Constellation - Letter to Judge Massingill - August 13 2025

Good afternoon,

Please see the attached letter to Judge Massingill from Joseph A. (Tré) Fischer III.

Thank you,

María Franco

Legal Administrative Assistant

Jackson Walker LLP

100 Congress Ave., Ste. 1100

Austin, TX 78701

O: 512.236.2202 | F: 512.236.2002

mfranco@jw.com

From: [Matt Mills](#)
To: [Beth Stanley](#); [Jay Quine](#)
Cc: [Stephanie Cooper](#)
Subject: Re: Request to Vacate Officer Regaling Incorporation Petition
Date: Thursday, August 14, 2025 4:37:34 PM

My take after discussing with Allen is we will leave this alone. If Marathon wants to sue over it, the courts are open. One guiding principle for me is language from the Texas Supreme Court last year. I think this would guide a court's decision in this matter.

As we have long and consistently held, "[t]he public interest is best served when public offices are decided by fair and vigorous elections, not technicalities leading to default." *In re Walker*, 683 S.W.3d 400 (Tex. 2024)

The petitioners did their signatures and had approval in early May. They thought they were fine up until very recently. Then they got a whole new round of signatures with more than enough. Stephanie signed off. Now there's arguably an issue with the size and other matters, but we don't have the time and resources to really investigate all that at the last minute. I think when it's a close call, courts prefer open elections over technicalities leading to default.

From: Beth Stanley <bstanley@hoodcounty.texas.gov>
Sent: Thursday, August 14, 2025 2:19 PM
To: Matt Mills <mmills@hoodcounty.texas.gov>; Jay Quine <jquine@hoodcounty.texas.gov>
Subject: Fw: Request to Vacate Officer Regaling Incorporation Petition

FYI

Beth Stanley
Court Administrator
Hood County Court
Tel: (817) 579-3200
Fax: (817) 579-3213

From: Paula Pendley <paula.pendley@nelsonmullins.com>
Sent: Thursday, August 14, 2025 2:15 PM
To: Ronald Massingill <rmassingill@hoodcounty.texas.gov>; Ronald Massingill <rmassingill@hoodcounty.texas.gov>
Cc: Robert Thackston <robert.thackston@nelsonmullins.com>
Subject: Re: Request to Vacate Officer Regaling Incorporation Petition

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Dear Judge Massingill,

We write to follow up on our letter below and proposed order. If there is any status on our request, please let us know. We understand there was some discussion at a hearing yesterday, and, if so, we would also like an opportunity to be heard. While Matt Mills confirmed he had not verified the number of signatures to ensure there were 50, he also indicated he had not confirmed the inhabitants of the proposed area were more than 201 residing in a contiguous community, that the signatures came from inside the proposed plat, and that the area was less than two square miles. This may have all been resolved and verified, but public online sentiment from a few indicate the only issue was a lack of signatures. Because of the potential impact on the community residents who do not wish for incorporation of a new municipality, we renew our request to receive notice of any other future filings concerning this effort.

Thank you,
Paula Pendley.
Sent from my iPhone

On Aug 5, 2025, at 6:07 PM, Paula Pendley <[redacted]@nelsonmullins.com> wrote:

Dear Judge Massingill:

We respectfully request that the Court vacate the Order entered on or about May 2, 2025, relating to the proposed incorporation petition filed by residents seeking to form a Type B municipality in Hood County, calling it Mitchell Bend, Texas.

After recently learning of the Order, we conducted diligence into the factual basis for the Petition. We then conferred with both County Attorney Matt Mills on July 22 and 25, and Elections Coordinator Stephanie Cooper on July 25 to determine whether any of the information submitted to the Court had been independently verified as accurate and meeting the requirements pursuant to Texas Local Government Code §7.001 and §8.002. They both confirmed that neither of them participated in verifying the accuracy of the information in the Petition.

We understand the Court relied on representations that the Petition complied with all legal requirements. However, based on our investigation, there appear to be defects on the face of the Petition submitted, including signature deficiencies, inclusion of ineligible territory, and irregularities in the map's configuration under sections §§ 7.001, 7.002, 7.006, 5.901 of the Texas Local Government Code and §11.002 of the Texas Election Code. By way of one example, by our count, the Petition contains at most 42 valid signatures - well short of the 50 signatures required for placement on the ballot under Texas law.

In light of this, we respectfully request that the Court vacate the prior Order approving the Petition and setting aside an election of whether Mitchell Bend, Texas can be incorporated as a Type B Municipality within Hood County.

A proposed Offer is attached for the Court's convenience. We are, of course, amenable to a hearing should the Court have any questions or desire input.

Given the significance of this issue and its potential impact on our client, MARA Holdings Inc. and other residents in the proposed area, who were not given notice about this Petition and proposed incorporation, we would appreciate the opportunity to receive notice of any future filings or proceedings concerning the incorporation effort.

Respectfully submitted,

<image001.png>

Paula D. Pendley

PDP/tls
Enclosure



PAULA PENDLEY PARTNER
paula.pendley@nelsonmullins.com
3333 LEE PARKWAY | SUITE 750
DALLAS, TX 75219
T 469.484.4770 F 469.828.7217
NELSONMULLINS.COM [VCA](#) [VIEW BIO](#)

<2025-08-05 Ltr to Judge Massingill re Vacate Offer - pdf.pdf>
<2025-07-25 Prop Offer VACATING Petition for Incorporation and Setting
Aside Election for Incorporation (003).pdf>

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From: Matt Mills <mmills@hoodcounty.texas.gov>

Sent: Friday, October 3, 2025 2:33 PM

To: Robert Thackston <robert.thackston@nelsonmullins.com>; Paula Pendley <paula.pendley@nelsonmullins.com>

Cc: Brenda Lampert <BLampert@hoodcounty.texas.gov>; Beth Stanley <bstanley@hoodcounty.texas.gov>

Subject: Incorporation petition

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Paula,

The county judge received your newest request to invalidate the coming election. I forwarded it to our consultant in Austin for feedback, and his opinion was similar to my first take. And that is that the courts are open for a filing for an injunction, but the county isn't going to invalidate the petition at this time.

Taylor Giannasi

Subject: FW: URGENT: Lawsuit Inaccuracies

From: Maci Lakey <macilakey96@gmail.com>

Sent: Friday, October 11, 2024 2:33:32 PM

To: Granbury <granbury@mara.com>

Subject: URGENT: Lawsuit Inaccuracies

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Good afternoon,

My name is Maci Randall. I am the daughter of Danny and Deanna Lakey who are key voices in the lawsuit being brought to Marathon.

I am reaching out to you today in hopes of avoiding my involvement in the lawsuit filed against Marathon by the citizens of Granbury, TX. In addition, I was advised to seek legal counsel immediately and am reaching out to you today because I cannot afford legal counsel and just want this matter washed from myself and my family.

Four weeks ago my father, Danny, interviewed with NBC Nightly News and said that my son Jonah had suffered from 4 recurrent ear infections and fluid leaking from his ears. This never happened and is not true. My father is now attempting to change his story since I confronted him and is stating that I lied to him and my mother, and they unknowingly reported that lie to their legal team and the media. This is also untrue.

In another recent article with Inside Climate News, my father reported that they had renovated their mobile home for the use of myself and my family. The truth is that we had volunteered to move in under the pretense that my dad was suffering from Alzheimer's disorder. My family and extended family were given this news in June of 2023. I offered myself as help to my parents given their health issues. My mother accepted my offer and I assisted with finding their contractor and assisted with purchasing supplies for the renovations. My father wanted to utilize the home as an AirBnb and protested us moving in. He also verbalized many times that my mother was bankrupting them, giving the contractors too much to do, and that he cannot afford the renovations. When we were told in August 2023 we would not be allowed to move in due to my dog, my parents then listed the home on AirBnB and VRBO....and allowed dogs on property. My dad boasted often about his profits and being closer to paying off the debt. He also included that they would be suing the contractors for incomplete/poor work, but also said that it was my mom's fault for giving them too much to do.

In November of 2023, due to my own health issues and difficulties with my husband's job, my mother offered for us to move in again. We paid \$7,000 out of pocket to break our lease, on top of expenses for moving, once again under the pretense that this would be helpful for my family and theirs. In reality

my father constantly complained about us being there, stating that the AirBNB was his retirement plan and they were in debt due to overspending. He requested several times for us to vacate so he could keep making back the money.

It came out in December of 2023 that my mother had lied about my dad having Alzheimer's, thus our reason for living there was invalid.

After months of conflicts on property, including my mother and father threatening to have my children removed by CPS for my "erratic behavior", my mother called me in April 2024 and told me that she was evicting myself and my family effective by the end of the week. She then called my two aunts, my mother in law, and my husband Tanner and told them the same thing. We left to Missouri, where my husband's family is, and that was that.

During my time in Granbury we were affected by the noise from your plant. That part is indisputable. The vibrations in our mobile home were beyond irritating, some vibrations did cause pain for my family. My toddler did wake up several times during our time there and said his ears hurt and would hold them. So, for full transparency, we were affected.

But my parents have lied to the media, to their attorneys, and are now trying to say that I am changing my story and gave them false information. This is a cover up for them.

I want to make it clear that I do believe that Marathon needs to do something about the problem, but I did not involve myself in the lawsuit and I have declined to speak to several reporters after doing one interview.

I am coming to you directly to report these lies from Danny and Deanna Lakey so I am not adept to the potential crime they are committing, and wish to please not be contacted as the lawsuit presses on unless absolutely necessary. I have absolute certainty that my parent's are exaggerating their story to maximize their potential payout. Including my mother's health issues...and their history of lawsuits.

Thank you,
Maci