

CAUSE NO. 2021-44641

CRYSTAL WRIGHT, Individually and As
Heir at Law of CHARLES WRIGHT,
Deceased, and KRYSTAL LENOX, As
Next Friend of G.W., A Minor Child

Plaintiffs

v.

CRISCO OPERATING, LLC

Defendant

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

333rd JUDICIAL DISTRICT

AGREED TEMPORARY RESTRAINING ORDER

Plaintiffs Crystal Wright and Krystal Lenox, As Next Friend of G.W., A Minor Child have filed a Verified Petition for a Temporary Injunction, and, in connection therein, have presented a request for a Temporary Restraining Order, as set forth in Plaintiffs' Original Verified Petition and Application for Temporary Restraining Order.

Plaintiffs and Defendant Crisco Operating, LLC have agreed to the following temporary restraining order. Having reviewed Plaintiffs' Original Verified Petition and Application for Temporary Restraining Order and the parties' agreement, the Court therefore **ORDERS** as follows:

1. Nothing in this Order is or should be construed as any admission of wrongdoing or liability by Defendant Crisco Operating, LLC. The parties have agreed to this Order solely for the purposes of jointly preserving the parties' access to evidence.

2. Solely for purposes of this Agreed Temporary Restraining Order, the parties agree that, absent this Order, Plaintiffs would face serious, imminent, and irreparable harm, including the loss of essential evidence, for which there is no adequate remedy at law.

3. Defendant Crisco Operating, LLC shall not deny Plaintiffs (and their attorneys, consultants, or experts) access to the premises near the Humble area of Harris County, Texas, where

Charles Wright was killed on July 21, 2021, as well as the well site, oil rigs, and all equipment, devices, and instrumentalities involved in the incident leading to Charles Wright's death. Neither party (or its attorneys, consultants, or experts) shall enter the premises without first notifying the other party and giving the other party's representatives the opportunity to be present.

4. Defendant Crisco Operating, LLC and its agents shall not alter, modify, clean, or in any manner change the condition of such premises, oil rigs, equipment, and instrumentalities until expiration of this Temporary Restraining Order or further Order of this Court.

5. Defendant Crisco Operating, LLC and its agents shall not destroy or alter any investigation documents, photographs, videotapes, witness information, statements, measurements, diagrams, reports or other materials, equipment, information, and data (in any format) relative to the July 22, 2021, incident.

6. Defendant Crisco Operating, LLC has agreed to waive the posting of a bond and has agreed to waive the requirement for personal service of this Temporary Restraining Order.

IT IS FURTHER ORDERED that the Petition of Plaintiffs for a Temporary Injunction be heard before the Honorable Morris of the 333rd District Court of Harris County, Texas, on the 2nd day of August, at 10:00 o'clock a. .m., requiring the Defendant then and there to show cause, if any there be, why a Temporary Injunction should not be issued as requested by Plaintiffs. The Clerk of this Court is hereby directed to issue a show cause notice to the Defendant to appear at the Temporary Injunction hearing.

This Temporary Restraining Order shall **EXPIRE** at 3:00 p.m. on August 2, 2021.

SIGNED this _____ day of _____, 2021.

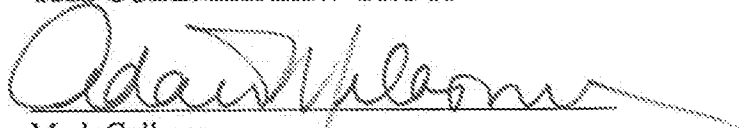
Signed:
7/23/2021
3:40 PM



JUDGE PRESIDING

AGREED AS TO FORM:

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