Filed: 11/27/2023 12:15 PM Michael Gould District Clerk Collin County, Texas By Karen Ellis Deputy Envelope ID: 81950569

#### 429-07008-2023 CAUSE NO.

CITY OF PLANO, TEXAS,	§	IN THE DISTRICT COURT
Petitioner	§	
	§	
V.	§	JUDICIAL DISTRICT
	§	
D & R NUTRITION AND WELLNESS	§	
CENTER, LLC dba TENNYSON WELLNI	ESS §	
CENTER and DIANA ZHANG, Individual	ly §	
Respondents	§	COLLIN COUNTY, TEXAS

# PETITION FOR PRE-SUIT DISCOVERY TO INVESTIGATE POTENTIAL CLAIMS AND REMEDIES PURSUANT TO RULE 202

#### TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW CITY OF PLANO, TEXAS, a home-rule Texas municipality, ("City"), pursuant to Rule 202, Texas Rules of Civil Procedure and files its Petition for Pre-suit Discovery to Investigate Potential Claims and Remedies, and would show the Court the following:

#### I. INTRODUCTION

The City of Plano brings this action to conduct pre-suit discovery for investigation of potential claims seeking injunctive relief, civil penalties, court orders, attorneys fees, and all other available remedies to stop and prevent TENNYSON WELLNESS CENTER and/or DIANA ZHANG ("Respondents") from engaging in or allowing illicit activity, criminal conduct, and/or lewd behavior, including Prostitution and Indecent Assault, being perpetrated under the guise of a massage establishment. Pretending to operate as a legitimate health-care provider in the midst of other businesses frequented by innocent citizens and children, Respondents' sale of sex acts creates a dangerous environment and public nuisance. Cloaked behind the façade of a licensed massage establishment in a medical and business complex at 6541 Preston Road in Plano, Respondents have failed to comply with statutory regulations and

legitimate practices designed to prevent sex crimes, attracting clientele who exploit women and may engage in deliberate deceptive measures to prevent exposure of their debauchery and criminal conduct.

The citizens of Plano are entitled to seek legitimate health care and other services for themselves and their families without unknowingly leading their children past a brothel or parking next to predators willing to purchase the bodies of women. Criminal prosecution of Respondents' employees for sexual offenses and state regulatory enforcement has been insufficient to protect the public, demonstrating a willingness to profit from the sex trade and flagrantly ignoring risks to the community.

The City of Plano is committed to putting an end to prostitution and other sex crimes that threaten law-abiding citizens and children, including using all available means to uncover profiteers as well as purchasers. Respondents have deceived citizens who mistakenly assume that the sale of sex only occurs in an obviously seedy establishment or part of town with visible streetwalkers, but the Tennyson Wellness Center is a sex broker hiding in plain sight. Respondents' sex workers and their corrupt consumers lurk among legitimate businesses, including health-care providers for children. So that potential respondents can be identified, testimony and other evidence can be preserved, consumers of the illegal activities be identified, and appropriate remedies can be pursued for protection of Plano's citizens and visitors, the City is seeking an order from the Court authorizing pre-suit discovery pursuant to Rule 202, Texas Rules of Civil Procedure.

During pre-suit discovery, the City will vigorously investigate Respondents, owners of the business(es), property owners, landlords, managers, operators, employees, contractors, predecessors, successors, transferees, customers, clients, co-conspirators, accomplices, promotors, invitees, guests, and all other parties to illegal or illicit activity ("Potential Litigation Respondents"). The City intends to take depositions orally and by written questions, request issuance of subpoenas duces tecum for and production of business and financial records, employee and customer records, and compliance with Texas law for massage establishments pursuant to Chapter 455, Texas Occupations Code, the statutory regulations governing massage establishments and massage therapy and authorizing a Texas municipal attorney to seek injunctive relief, civil penalties, court orders to prevent violations, and recovery of expenses.

# II. FACTUAL BASIS AND REASONS FOR SEEKING RULE 202 DISCOVERY: PERSISTENT PATTERN OF IMPROPER AND CRIMINAL CONDUCT

#### 1. CRIMINAL CONDUCT

On two different dates this year, Plano Police arrested employees of TENNYSON WELLNESS CENTER, located at 6541 PRESTON ROAD, SUITE 200, PLANO, COLLIN COUNTY, TEXAS, for sexual crimes, including Prostitution and Indecent Assault, committed at TENNYSON WELLNESS CENTER while massage therapy was supposed to be performed. At the time of both arrests, DIANA ZHANG was identified as an owner, director, managing member and person with care, custody, or control over the business.

On February 23, 2023, Plano Police arrested QIAOYU ZHANG at TENNYSON WELLNESS CENTER for PROSTITUTION, a criminal offense in violation of Sec. 43.02, Texas Penal Code. QIAOYU ZHANG claimed to be a citizen of China and resident of Flushing, New York with a Driver License issued by the State of New York, while working as a massage therapist in Plano, Texas for Respondent. Respondent DIANA ZHANG was named as an owner, director, and managing member of Respondent and was working with QIAOYU ZHANG at the premises at the time of the prostitution arrest.

Respondents have knowingly failed to take steps to prevent further sex crimes at the business and continued to hide behind the façade of a legitimate health-care provider. On September 7, 2023, Plano Police arrested TIFFANY SONG at TENNYSON WELLNESS CENTER for INDECENT ASSAULT, a criminal offense in violation of Sec. 22.012, Texas Penal Code. Also working for Respondent with TIFFANY SONG at the time of the second offense was DIANA ZHANG (named as owner, director, and managing member of Respondent and also present at the same location when QIAOUY ZHANG was arrested for Prostitution) and HONG ZHANG, identified by a customer as offering a sex act for payment of money on the same date as the Indecent Assault.

#### 2. COMPLAINTS FROM CITIZENS.

On multiple occasions in January and February, 2023, law enforcement received numerous complaints from citizens that massage therapists employed by Respondent inappropriately touched customers and offered to perform sexual acts in return for money. At the time of the arrest of TIFFANY SONG for Indecent Assault on September 7, 2023, a customer of HONG ZHANG provided information to Police that he had received offers of sexual acts for payment of money from HONG ZHANG and other employees while receiving massage services at TENNYSON WELLNESS CENTER. Previously, Texas Department of Licensing and Regulation ("TDLR") had received a complaint from a citizen who said he was charged for sexual acts that he did not request, and Respondents' employee refused to refund the money for those sexual acts. TDLR inspectors also observed finger condoms at the premises, and Respondent TENNYSON WELLNESS CENTER received a warning for the violation of the regulations in Chapter 455 of the Texas Occupations Code. In March 2023, TDLR issued a

warning to Respondent TENNYSON WELLNESS CENTER for not maintaining records as required by state regulations for massage establishments.

# 3. CLOSE PROXIMITY TO LEGITIMATE BUSINESSES AND HEALTH-CARE PROVIDERS FREQUENTED BY THE PUBLIC.

Located in a business complex in Plano, Respondents' illicit massage establishment is engaging in sex crimes in a busy suburban area. This is the seemingly innocent façade:





In this very same complex as TENNYSON WELLNESS CENTER, there are dental offices, including a pediatric dentist, a medical office specializing in obstetrics and gynecology, an opthalmologist, an oral surgeon, an office for orthopedics and sports medicine, an infectious disease medical office, a facial and plastic surgery center, a heart treatment center, and other businesses, including law offices, a construction and design company, and a certified public accountant. Appearing on the outside to blend in with legitimate health-care providers, TENNYSON WELLNESS CENTER is little more than a front for criminal activity, in close proximity to lawful medical providers frequented by the unsuspecting public, including children. In fact, TENNYSON WELLNESS CENTER promotes its location as a "MEDICAL CENTER" in online advertising, as depicted in EXHIBIT NO. 1.

#### 4. DANGER TO THE PUBLIC AND SEX REVIEWS

Those who frequent TENNYSON WELLNESS CENTER for the purchase of vulnerable women's bodies brag in anonymity and share reviews of the sex crimes for sale. Attached hereto as EXHIBIT NO. 2 are copies of representative online reviews of the sex acts and women available for sale at TENNYSON WELLNESS CENTER. The online reviews of women being purchased at TENNYSON WELLNESS CENTER contain demeaning evaluations of their bodies, including breast size, "ass rating", and pubic area. The women are given "service ratings", like twisted Yelp reviews from those deviants who purchase their bodies in this self-described "medical center". Reviewers provide graphic descriptions of sex acts purchased from prostitutes at TENNYSON WELLNESS CENTER. Some reviews require membership fees paid to the online review database, but others are readily available to anyone in the public searching online for reviews of TENNYSON WELLNESS CENTER. Respondents can hardly pretend the advertising and online presence for TENNYSON WELLNESS

**CENTER** projects an image of a wholesome and legitimate massage establishment. It is abundantly clear that Respondent advertises itself with salacious images of scantily clad employees and provocative poses. Attached hereto as EXHIBIT NO. 3 are copies of representative advertising by Respondent, including the following example:



- 5. PERSONS TO BE DEPOSED, SUBSTANCE OF ANTICIPATED TESTIMONY, AND REASONS FOR OBTAINING TESTIMONY OF EACH
  - a. Designated representative of D & R NUTRITION AND WELLNESS, LLC DBA TENNYSON WELLNESS CENTER, 6541 Preston Road, Suite 200, Plano, Texas 75024, by serving its registered agent for service of process, Lam, Po and Xu, CPA's, 1170 Corporate Drive W., Suite 204, Arlington, Texas 76006;
  - b. DIANA ZHANG, 3537 Pillar Drive, Plano, Texas;

- c. CCH REAL ESTATE, LLC, registered agent for service of process and managing member, Christine Hopkins, at 6541 Preston Road, Suite 100, Plano, Texas 75024 or 4600 Oak Shores Drive, Plano, Texas 75024;
- d. PRESTON COMMONSGATE CONDOMINIUM, registered agent for service of process, Lance E. Williams, 3811 Turtle Creek Boulevard, Suite 500, Dallas, Texas 75219; Bryan Kerns, President and Director, 6533 Preston Road, Suite 300, Plano, Texas 75024 or 6529 Preston Road, Plano, Texas 75024.

The substance of the testimony to be elicited from Respondents D & R

NUTRITION AND WELLNESS LLC DBA TENNYSON WELLNESS CENTER and

DIANA ZHANG is exhaustively detailed in the foregoing paragraphs, but essentially, to
ascertain information about their compliance with applicable laws and statutes authorizing
massage establishments and prohibiting criminal conduct and public nuisances. The
substance of the testimony to be elicited from CCH REAL ESTATE LLC and PRESTON

COMMONSGATE CONDOMINIUM is the scope of their knowledge of the operations
and activities of Respondents, their ownership of the premises where Respondents are
engaged in improper and/or illegal activities, their business relationship with the
Respondents, and other matters pertinent to the investigation and possible claim or suit
which may be filed against Respondents - and perhaps others.

The likely benefit to the public of allowing the City to take the requested depositions to investigate potential claims far outweighs the burden or expense of the procedure, particularly since – as detailed above – the Respondents are engaged in a scheme of illicit and illegal behavior which is substantially detrimental to the health, safety and wellbeing of the public. It is unknown at this point if the property owner(s)/landlord(s) are complicit in this illicit and illegal activity, or rather, merely pocket the rent money and then turn a blind

eye to the obvious sale of sex on their property. Under either scenario, it seems surprising that a legitimate owner/landlord would knowingly allow the sale of sex to be permitted on their property, particularly in a medical center frequented by families and children.

#### III. PARTIES

- Petitioner, CITY OF PLANO, is a home-rule Texas municipal corporation located in Collin and Denton Counties, Texas.
- Respondent, TENNYSON WELLNESS CENTER, is located at 6541 Preston Road, Suite 200, Plano, Texas 75024. Respondent can be served through its registered agent or wherever they may be found.
- 3. Respondent, **DIANA ZHANG**, is an individual residing in Collin County, Texas, and can be served at 3537 Pillar Drive, Plano, Texas.

#### IV. JURISDICTION AND STATUTORY AUTHORITY

Under Texas Rule of Civil Procedure 202, venue is proper in this county because venue of the anticipated suit is in Collin County, Texas. *See* Tex. R. Civ. P. 202.2(b). This Court has jurisdiction over these matters pursuant to the appropriate sections of the Texas Constitution, the Texas Civil Practice and Remedies Code, and the Texas Occupations Code. This Petition for Pre-Suit Discovery to Investigate Potential Claims and Remedies arises out of activities and conduct occurring within Collin County, Texas, making this Court an appropriate forum for venue of this action.

Chapter 455 of the Texas Occupations Code ("Occupations Code") provides statutory authority for remedies designed to protect the public in the provision of massage therapy. The conduct and licensing of massage therapists, massage schools and instructors, and the licensing and operation of massage establishments are regulated as a Health Profession in Chapter 455.

The statute authorizes the City Attorney to seek injunctive relief against any person who appears to be in violation or is threatening to violate Chapter 455, including court-ordered requirements to prevent further violation. Chapter 455 authorizes assessment of civil penalties of \$1,000 – \$10,000 for each violation, and every day of occurrence is a separate violation. Chapter 455 further provides that the City may recover reasonable expenses in obtaining injunctive relief and civil penalties, including court costs, attorneys' fees, investigative costs, witness fees, and deposition expenses.

#### V. SELECTION OF DISCOVERY LEVEL

1. Petitioner intends to conduct discovery under Level 2 of the Texas Rules of Civil Procedure 190.3 because this suit involves only monetary relief aggregating not more than \$100,000, excluding court costs and pre-judgment interest, and Plaintiff affirmatively pleads that this suit is not governed by the expedited actions process in Texas Rule of Civil Procedure 169.

#### VI. CONLUSION AND PRAYER FOR RELIEF

For the reasons stated above, Petitioner the City of Plano respectfully requests the Court, after service of this Petition and notice, to hold a hearing on this Petition pursuant to Tex. R. Civ. P. 202.3(a), issue an order authorizing the City to take the depositions of the persons identified herein as well as authorizing the City to issue subpoenas requiring these entities and/or persons to produce documents at their depositions.

### WHEREFORE, PREMISES CONSIDERED, the City of Plano respectfully prays:

- 1. That Respondents be cited and required to appear herein;
- 2. That the Court set a date for this matter to be heard;

- 3. That the Court authorize pre-suit discovery/depositions as requested herein; and
- 5. Any and all other relief, at law or in equity, to which the City of Plano may show itself to be justly entitled.

Respectfully submitted,

/s/ Paige Mims

PAIGE MIMS
City Attorney
MICHELLE L. VOIRIN

Assistant City Attorney State Bar No. 20606640 P.O. Box 860358

Plano, Texas 75086-0358 Telephone: (972) 941-2056

Facsimile: (972) 941-2059 Email: michellev@plano.gov

ROBERT J. DAVIS State Bar No. 05543500

MATTHEWS, SHIELS, KNOTT, EDEN, DAVIS & BEANLAND, L.L.P.

8131 LBJ Freeway, Suite 700 Dallas, Texas 75251 972/234-3400 (office) 972/234-1750 (telecopier) bdavis@mssattorneys.com

ATTORNEYS FOR PETITIONER CITY OF PLANO, TEXAS

#### **VERIFICATION**

STATE OF TEXAS {
COUNTY OF COLLIN {

BEFORE ME, a Notary Public in and for the State of Texas, personally appeared ED DRAIN, and after being by me first duly sworn, upon oath states that he is the Chief of Police for the City of Plano, Texas, he has read the foregoing PETITION and that the factual statements contained therein are true and correct based upon the composite knowledge of the City of Plano and the information available to the City of Plano. The information supplied in this PETITION is not based solely on the knowledge of the executing party, but includes knowledge of the City of Plano, its agents, representatives, and possibly others. The word usage and sentence structure may be that of the attorney assisting in the preparation of this PETITION, and thus, does not necessarily purport to be the precise language of the executing party.

ED DRAIN

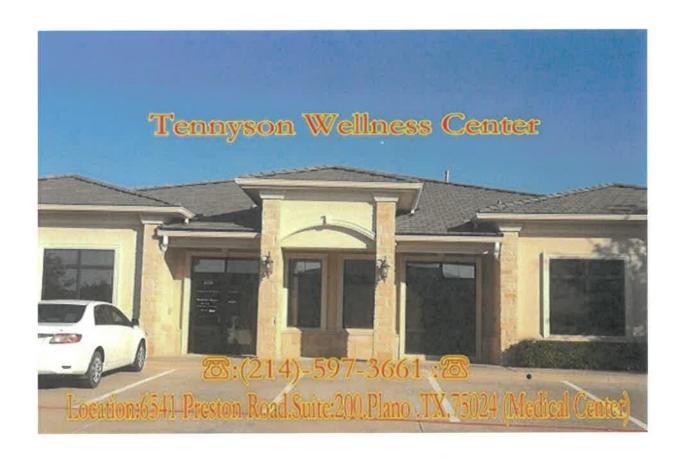
SWORN TO AND SUBSCRIBED BEFORE ME, on this the \_\_\_\_\_ day of November, 2023, which witness my hand and seal of office.

WENDI JOY DOUGLAS

Notary Public
State of Texas
ID # 13192386-4
Comm. Expires 03/11/2027

NOTARY PUBLIC State of Texas

## **EXHIBIT 1**



#### **EXHIBIT 2**



#### More Details:

Underwhelming experience.

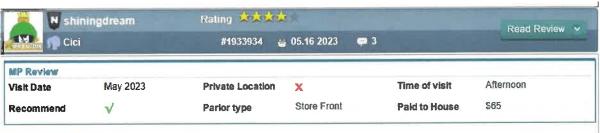
Got ready while she went out. She was very sweet but was strictly buisness at the same time.

She started an almost non-massage on my back with oil. Very light, basically just rubbing. During this, she moved my hand up her dress to finger hers but over clothes.

She then saw the tip in my hand, laughed and yanked it out of me. She told me to flip and began oiling my Johnson. She insited she would be fully clothed for the tip. She started working him with oil and moved my hand to her breasts allowed me to touch her but over clothes.

She then primarily focused on working him HJ alternating between fast and slow and sat on the table. It wasn't able to finish despite her going harder and told her no shirt might help but she said no.

Working harder still nothing and she told me she can't keep doing this but wasn't annoyed, she was playful. She then sat on the table and had me work it myself while playing with my balls and flicking my nipples. She moaned a lot. She kept saying how the tip wasn't enough for anything else and we were running out of time. After some time, I finished and she cleaned me up.



#### Massage Partor Details:

Cici has a really nice body. She's young and very sexy! I was very happy with our session.

Provider's nar Provider Details					
Recommend?	V	Eye color	Brown	Build	Perfect
Provider Rating	食食食食主	Hair color	Black	Rate Ass	Nice & Round
Ethnicity	Asian	Hair Length	Long	Kitty	Clean Shaven
Age	25-30	Breast Size	8	Tattoos	x
Height	5'0"-5'5"	Implants	x		
Services:					
Service Rating	党党党党会	Lick The Pussy	V	Massage Rating	食食食食士
Finger The Pussy	V	FS	CFS	Ass-Play?	√
Kissing	X	Breast-Play?	V	Handjob	√
Tipping Issue?	x	Blowjob	<b>V</b>	Prostate Massage	X
				Extra Tip	S100

#### More Details:

Massage was quite nice; she puts a good effort into it.

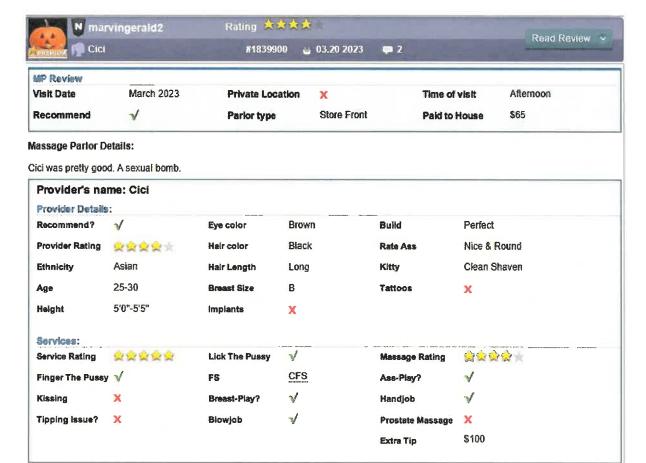
Lots of grabbing my balls and dick from behind. I never really know how to respond to that. Raising my ass as much as I can within comfort, but it's not the most comfortable position for me.

Tap to flip, and then began the decontamination process with alcohol lol.

She stripped down and we kind of fondled each other at the side of the massage table. She then started with her succutent BBJ. She started with 69 position. She edged me pretty quickly, so I suited up and had her get on all 4s so I could pummel her till completion.

I finished a little sooner than I wanted but it was still worth it.

The usual wipe down and post-massage stuff, and hung out for another 5 minutes chatting.



#### More Details:

Cicl is a little taller than the standard Asian girl, very passionate once I broke the ice when she was delivering a good dry body-to-body massage, it culminated in a good long BBBJ, wasn't able to get one out so we moved to the 69 part which was amazing. Wet, clean, and very responsive pussy. Encouraged me to tongue fuck her deep as she rubbed her pussy. We stop, I get up and we go Missionary, pounded and pounded while rubbing her clit before i pulled the cover off and jerk off on her small b tittles. Talk about cleaning a messy cumshot iol.

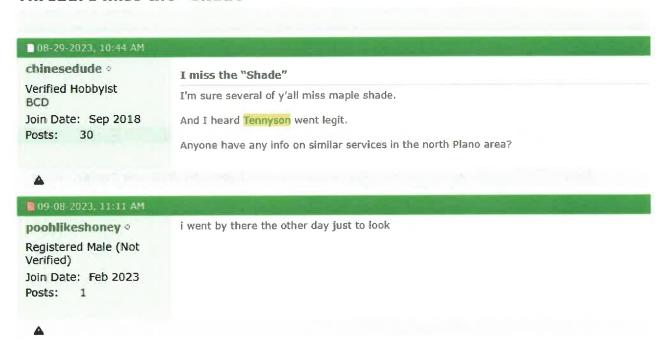
Rate massage parlor review:



↑ Forum → main forum set (hold) → Texas → Dallas → Public Forums → Asian Salons/Spa/MP Reviews-Dallas → LINi

### + Reply to Thread

## Thread: I miss the "Shade"



### ■ 10 07-3020 DH54-

#### Bigdayeintx :

Verified Hobbyist BCD

Join Date: May 2019

Posts: 30

Tina @ Tennyson Wellness Center

Tina @ Tennyson Wellness Center

Agency/Spa/Club Name, Companion's Handle: Tennyson Wellness Center, Tina Date of Visit: 10/04/20
Preferred Method of Contact: Walkin Phone Number: Email Address: Website, Ad, or Profile URL: City, State: Plane, TX
Location: Preston and Tennyson Type of Visit: Was the Appointment On-Time?? Activities: PBSN, DATY, BBBJ, CFS
Length of Visit: 30
Donation: 945 + 5160
Approximate age of Companion: 45
Hair Color and Length: Black below shoulder Smoking Status: Unknown Ethnic/Racial background: Chinese Companion Description: Built like a brick with nice Bs Meet or Exceed Your Expectations?? exceed Would you recommend this Agency/Spa?? yes Would You Recommend this Companion?? yes

Public comments:
Was out their way on a Sunday and decided to stop in and see what Tenhysoxi was all about. Was meet by Tina who is probably 5'8 or 5'9 and is thick (not fat) just really thick.



The rest of the story is hidden. You must be a verified hobbylst to view additional content.

#### 12-18-2018, 11-30 PM

#### FarealFun o

Verified Hobbyist

BCD

Join Date: Dec 2018

Location:

Mckinny, Plano, Allen

Posts: 37 Tennyson in Plano

Agency/Spa/Club Name, Companion's Handle: Tennyson Wellness Center, Jenny

Date of Visit: 12/14/2018

Preferred Method of Contact: Walk-In

Phone Number: Not sure

Email Address: N/A

Website, Ad, or Profile URL: N/A City, State: Plano, TX Location: Medical center past Tennyson Rd

Type of Visit: Incall

Was the Appointment On-Time?? N/A

Activities: CFS, CJB, HJ

Length of Visit: 60 min

Donation: 60 + 120

Approximate age of Companion: 35-40

Hair Color and Length: Black, Long

Smoking Status: None

Ethnic/Racial background: Asian

Companion Description: Very nice body, perky B/C tits, mommy damage.

Meet or Exceed Your Expectations?? Met

Would you recommend this Agency/Spa?? Yes

Would You Recommend this Companion?? Yes

Public comments:

I've been to Tennyson a few times now, decent sensual massage, pretty girls and good services.



The rest of the story is hidden. You must be a verified hobbyist to view additional content.

## Review: Tennyson Wellness-Cathy

- Thread starter<u>Sexman</u>
- Start date<u>Dec 14, 2022</u>



#### Sexman

Registered Member Messages: 21 <u>Reviews: 17</u> Joined Feb 21, 2019

### Dec 14, 2022

#1

Title: Review: Tennyson Wellness-Cathy

**Date**: Jun 7, 2022

**Location**: 6542 Preston Rd **Phone**: (214) 597-3661

City: Plano State: TX Activities: HE Age Estimate: 37

Ethnic background: Chinese

Physical Description: Thin skinny around 5'6"

Click to unlock the hidden Private Details in this review

## Review: Lala

- Thread starter
- Start dateMay 7, 2021



## May 7, 2021

<u>#1</u>

**Title**: Review: Lala **Date**: Apr 30, 2021

**Location**: Tennyson Wellness

Phone: City: Plano State: Texas

Activities: Massage, L1 Age Estimate: 45+

Ethnic background: Chinese

Physical Description: 5'2, black hair, thin

Click to unlock the hidden Private Details in this review

## Review: Jaimie at Tennyson

- Thread starter<u>OnlyAmps4MeNow</u>
- Start date<u>Sep 23, 2019</u>



### Sep 23, 2019

#1

Title: Review: Jaimie at Tennyson

**Date**: Aug 24, 2019

**Location**: Preston Road at Tennyson

**Phone**: 214-587-3661

City: Plano State: TX Activities: L1 Age Estimate: 40

Ethnic background: Chinese

**Physical Description**: Taller Asian, nice ass, some boob, kind of a horsey mouth. Toothie.

Not unattractive but not attractive.

Click to unlock the hidden Private Details in this review

## Review: Tennyson Wellness Center Plano TX

- Thread starter<u>Luwop</u>
- Start date<u>May 24, 2019</u>



## May 24, 2019

<u>#1</u>

Title: Review: Tennyson Wellness Center Plano TX

Date: Apr 29, 2019

**Location**: 6541 Preston Rd Plano, TX 75024

**Phone**: (214) 597-3661

**City**: Plano **State**: texas

Activities: Massage, L1 Age Estimate: 28

Ethnic background: Asian

Physical Description: Big Boobs, Nice Ass, Long Hair, Nice Voice

Click to unlock the hidden Private Details in this review

Recommendation: No



## Review: Sofia @ tennyson wellness center

- Thread starter CHOLAN 123
- Start dateMar 12, 2019



Reviews: 2
Joined Mar 7, 2019

### Mar 12, 2019

#1

Title: Review: Sofia @ tennyson wellness center

Date: Dec 20, 2018

Location: 6541 Preston Rd Ste 200Plano, TX 75024

Phone: 2145973661

**City**: Plano **State**: Texas

Activities: CBJ, DFK, CFS

Age Estimate: 30S

Ethnic background: Korean

Physical Description: Slim, Pretty

Click to unlock the hidden Private Details in this review

## Review: Cici @ Tennyson wellness center

- Thread starter<u>randar</u>
- Start dateFeb 25, 2019



randar
Always Looking!
Messages: 5
Reviews: 4
Joined Feb 6, 2019

## Feb 25, 2019

<u>#1</u>

Title: Review: Cici @ Tennyson wellness center

**Date**: Feb 20, 2019

**Location**: Preston Rd & Tennyson Pkwy

**Phone**: (214) 597-3661

City: Plano State: TX

Activities: Massage, FK, CBJ, CFS

Age Estimate: 25-35 Ethnic background: Asian

**Physical Description**: About 5'5", C Cups, Trimmed (not shaved)

Click to unlock the hidden Private Details in this review

## Review: Tennyson Wellness a little short

- Thread starterthreeshox
- Start date<u>Jan 3, 2019</u>



### Jan 3, 2019

#1

Title: Review: Tennyson Wellness a little short

**Date**: Nov 14, 2018

Address: Tennyson and Preston

Phone: City: Plano State: Tx Activities: HJ Age Estimate: 35

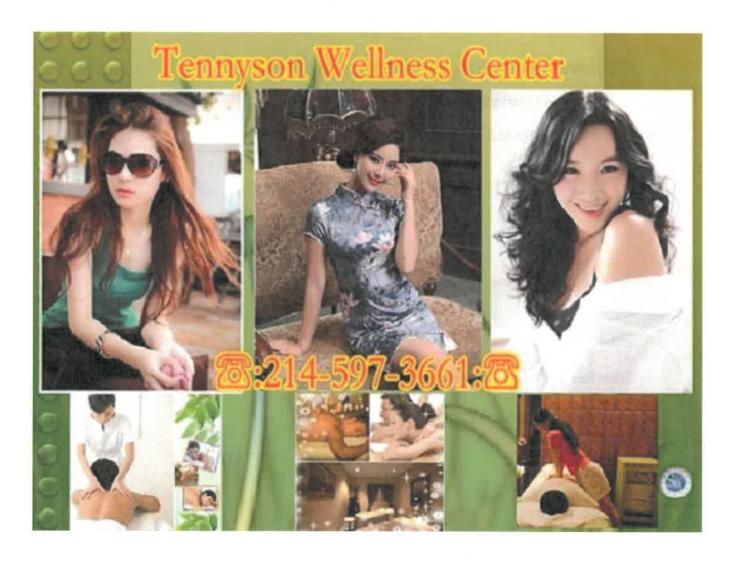
Ethnic background: Korean

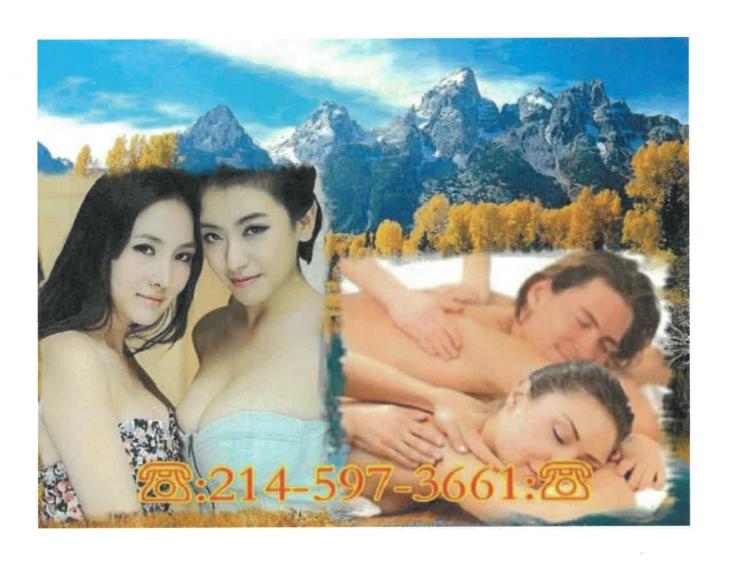
Physical Description: Tall, slender, long hair, small tits b cup and tight ass

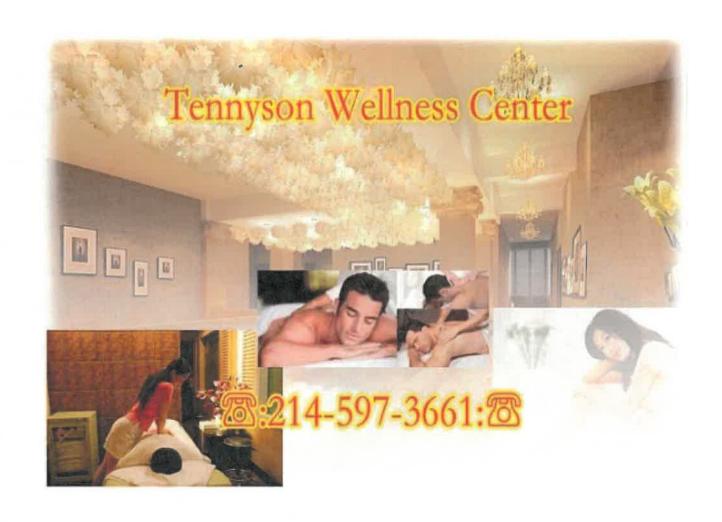
Summary: Wonderful with a nice lady, took me to the edge and then caught my explosion

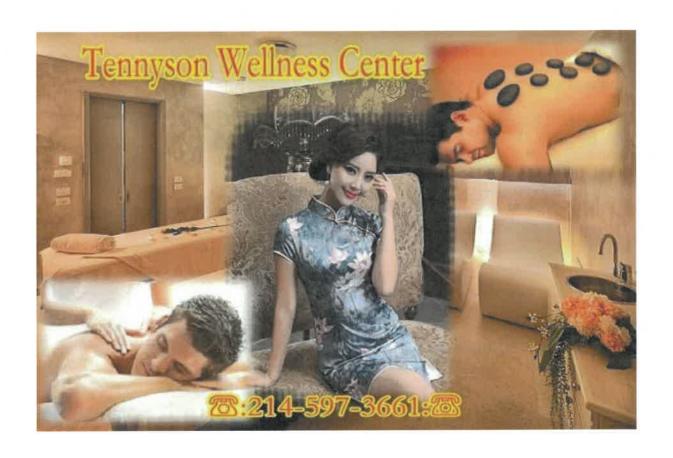
Click to unlock the hidden Private Details in this review

## **EXHIBIT 3**









### **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Pat Weaver on behalf of Robert Davis Bar No. 05543500 pweaver@mssattorneys.com Envelope ID: 81950569

Filing Code Description: Plaintiff's Original Petition (OCA)

Filing Description: Petition for Pre-Suit Discovery to Investigate Potential

Claims and Remedies Pursuant to Rule 202

Status as of 11/27/2023 4:57 PM CST

#### **Case Contacts**

Name	BarNumber	Email	TimestampSubmitted	Status
Robert Jacob Davis	5543500	bdavis@mssattorneys.com	11/27/2023 12:15:33 PM	SENT