

CAUSE NO. 24-CV-0506

LOWE'S PRO SUPPLY,
Plaintiff,

v.

JMK5 MARINA, LLC,
Defendant.

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IN THE DISTRICT COURT

212th JUDICIAL DISTRICT

GALVESTON COUNTY, TEXAS

**RECEIVER'S MOTION TO
HOLD DEBTOR'S PRINCIPAL JEROME KARAM IN CONTEMPT FOR
FAILURE TO TURNOVER**

Peter Ruggero, in his capacity as the Court's appointed post-judgment turnover receiver ("Receiver"), files this motion ("Motion") seeking compliance with the Court's *Order Requiring Turnover and Appointing Receiver* ("**Turnover Order**"), and shows:

1. On September 27, 2024 this Court entered a final judgment in favor of Plaintiff and against Defendant JMK5 Marina, LLC ("**Debtor**") for \$233,844.21 plus interest and costs.
2. On September 10, 2025 the Court entered the Turnover Order.
3. Under the Turnover Order, Debtor is required to turnover all of their non-exempt property, including documents related to such property, within five days to Receiver.
4. On October 16, 2025 and again on October 23, 2025 Debtor received notice of the Turnover Order. Receiver has left voicemails and text messages for the Debtor and its principal Jerome Karam. None were responded to by them. Receiver further did exchange text messages with the Debtor's manager, who has since ceased

working due to non-payment by Mr. Karam. Debtor and Mr. Karam refuse to comply with this Court's Turnover Order.

5. To date, despite repeated requests by Receiver, Debtor and Mr. Karam continue to fail to comply with the Turnover Order.

6. Under information and belief, Debtor and Mr. Karam have converted receivership property and are actively taking steps to disobey the Court's Turnover Order, including but not limited to intentionally disregarding the Turnover Order and converting receivership property.

WHEREFORE, Receiver requests the Court provide the Debtor and Mr. Karam an opportunity at the hearing on this Motion to demonstrate to the Court their compliance with the Turnover Order, and to the extent they failed to comply, that the Court:

- a. hold Debtor and Mr. Karam in contempt of court,
- b. issue a writ of attachment for Debtor and Mr. Karam,
- c. fine Debtor and Mr. Karam,
- d. confine Mr. Karam to jail for 24 hours and thereafter until they purge themselves of the contempt of court by compliance with the orders of this Court,
- e. require Mr. Karam to post a bond payable to Receiver to ensure Debtor's appearance if released from confinement,
- f. order Debtor and Mr. Karam pay all costs of Court for this proceeding,
- g. require Debtor and Mr. Karam to pay reasonable expenses incurred by Receiver in making this Motion and obtaining an order for contempt, and
- h. grant Receiver such further and other relief the Court deems just.

Date: February 23, 2026

Respectfully Submitted,

/s/ Peter C. Ruggero

Peter C. Ruggero
State Bar No. 24044376
RUGGERO LAW FIRM PC
1411 West Ave, Ste. 200
Austin, Texas 78701
Telephone: 512.473.8676
Fax: 512.852.4407
peter@ruggrolaw.com

COURT APPOINTED RECEIVER

CERTIFICATE OF CONFERENCE

I certify that I tried to conferred with Debtor repeatedly regarding lack of compliance by Debtor with the Turnover Order and requesting their response so as to avoid need for motion for contempt.

/s/ Peter C. Ruggero
Peter C. Ruggero

CERTIFICATE OF SERVICE

I certify that on February 23, 2026, the foregoing motion was served on the following in the manner indicated.

Judgment Debtor

Jerome M. Karam, Registered Agent
JMK5 Marina, LLC
308 W. Parkwood Avenue, Suite 104A
Friendswood, TX 77546
Via CMRRR # 9214 8901 4298 0452 2897 02 and First Class Mail

Jerome M. Karam
2010 San Miguel Drive
Friendswood, TX 77546
Via CMRRR # 9214 8901 4298 0452 2899 31 and First Class Mail

Counsel to Plaintiff/Judgment Creditor:

Matias Eduardo Garcia
Barnett & Garcia, PLLC
3821 Juniper Trace, Suite 108
Austin, TX 78738
Via email matt@barnettgarcia.com

/s/ Peter C. Ruggero
Peter C. Ruggero

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.

Peter Ruggero on behalf of Peter Ruggero

Bar No. 24044376

peter@ruggelaw.com

Envelope ID: 111605797

Filing Code Description: Motion

Filing Description: Receiver's Motion to Hold Debtor's Principal Jerome Karam in Contempt for Failure to Turnover

Status as of 2/23/2026 4:50 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kayleigh K.Smith		Kayleigh@barnettgarcia.com	2/23/2026 3:57:10 PM	SENT
Peter CRuggero		peter@ruggelaw.com	2/23/2026 3:57:10 PM	SENT
Matias Garcia	24012675	matt@barnettgarcia.com	2/23/2026 3:57:10 PM	SENT