

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Robert S. Bennett, Nachael Foster,
Andrew Bayley and others similarly situated

Plaintiffs

vs.

State Bar of Texas aka the “Texas Bar”
(and culpable officials within it)

Defendants

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CIVIL ACTION 4:21-cv-2829

CLASS ACTION COMPLAINT

**PLAINTIFFS’ AMENDED CERTIFICATE OF CONFERENCE REGARDING THEIR
FEBRUARY 7TH, 2022 MOTION FOR AN EXTENSION TO RESPOND TO THE
DEFENDANTS’ PENDING MOTIONS TO TRANSFER AND / OR DISMISS OUR CASE**

CERTIFICATE OF CONFERENCE


I, Richard Robins, do hereby acknowledge that on February 7th, 2022 I e-mailed opposing counsel Pat Mizell a copy of our motion for an extension to Attorney Mizell’s recent motions to dismiss or to transfer our legal action. More recently, I e-mailed him a relevant follow-up inquiry on February 14th, 2022. While our interactions have always been cordial, opposing counsel has neither rejected nor supported our proposed 2 month extension which would enable us to learn what the U.S. Supreme Court intends to do regarding the underlying McDonald v. Firth case. *McDonald v. Firth* (No. 21-800 (U.S.); No. 20-5448, 4 F 4th 229 (5th Cir. 2021); No. 1:19-cv-219- LY (W.D. Tex.)). It remains our belief that a victory for the plaintiffs in that case would make sovereign immunity arguments on behalf of the Texas Bar, as well as mandatory membership in the state bar association here in Texas, obsolete.

Defendant(s):

State Bar of Texas aka the “Texas Bar”
Texas Law Center
1414 Colorado Street
Austin, Texas 78701

As represented by:

Patrick Mizell
1001 Fannin St # 2300
Houston, TX 77002
pmizell@velaw.com
Tel. 713-758-2932

By: 
Rich Robins
Attorney In Charge


CERTIFICATE OF SERVICE

I, Rich Robins, do hereby certify that on February 14th, 2022, we electronically filed with the Clerk of the Court for the U.S. District Court for the Southern District of Texas (via the Court’s recently merged CM/ECF/PACER system) a true and correct copy of the above and foregoing Plaintiffs’ Motion for an Extension. The Clerk will send notification of such filing to the Defendant State Bar of Texas aka the “Texas Bar” at:

State Bar of Texas aka the “Texas Bar”
Texas Law Center
1414 Colorado Street
Austin, Texas 78701

via their recently announced legal counsel:

Patrick Mizell
1001 Fannin St # 2300
Houston, TX 77002
pmizell@velaw.com
Tel. 713-758-2932

By: 
Rich Robins
Attorney In Charge

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CLASS ACTION COMPLAINT

ORDER

The Court hereby acknowledges the Plaintiffs' motion for an extension and orders as follows:

Signed on _____ at Houston, Texas.

Honorable Alfred H. Bennett
United States District Judge