

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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

Plaintiffs

CIVIL ACTION 4:21-cv-2829

vs.

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

CLASS ACTION COMPLAINT

Defendants

**PLAINTIFFS’ UNOPPOSED MOTION FOR AN EXTENSION FOR REPLYING
TO DEFENDANTS’ RESPONSE TO PLAINTIFFS’
“SHOW AUTHORITY” MOTION**

1. Come now the Plaintiffs through legal counsel Rich Robins and they represent as follows...

FACTS

2. The Plaintiffs’ have a reply due today (February 17th, 2022) to the Defendants’ recent response to the Plaintiffs’ fairly recently filed motion to show authority to litigate this case for the Texas Bar.
3. The Plaintiffs have responded to the Defendants’ recently pursued motions to dismiss or to transfer our pending lawsuit by challenging the Defendant Texas Bar’s lack of compliance with the Texas Government Code’s requirements that the Texas Bar’s selection of legal representation in situations like these be pursuant to competitive bidding.
4. Plaintiffs’ counsel Robins and Defendants’ counsel Mizell have been cordial and cooperative 100% of the time, and further conferencing between them could lead

to a simplification of this pending show authority endeavor if not a withdrawal of the Plaintiffs' pending motion.

5. Defense counsel Mizell and his team are *unopposed* to Plaintiffs' counsel Robins' receiving a one week extension to reply, by Thursday, February 24th, 2022, to the Defendants' response to the Plaintiffs' pending motion to show authority.

ARGUMENT & AUTHORITIES

6. Federal Rule of Civil Procedure 6(b) and other authorities allow the Court to extend deadlines for good cause. Plaintiffs' counsel submits that the abovementioned facts show that good cause exists, while hoping that the Court agrees.

CONCLUSION & PRAYER

7. Attorney Robins requests a one week extension to reply to the Defendants' recent response to the Plaintiffs' pending motion to show authority. The *unopposed* reply date is Thursday, February 24th, 2022.

DATED: February 17th, 2022

Respectfully submitted,

Rich Robins
Robins Legal Services, PLLC
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By:



Rich Robins
Attorney-In-Charge

CERTIFICATE OF CONFERENCE

I, Rich Robins, do hereby certify that opposing counsel Tom Mizell and I have conferenced about this extension pursuit for the pending show authority motion. He and his team are *unopposed*.

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 Thursday, February 17th, 2022, we e-mailed opposing counsel and also 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 to reply to the Defendants' response to the Plaintiffs' show authority motion. The CM/ECF/PACER system will similarly 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 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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ORDER

The Court has reviewed the Plaintiffs’ motion for an extension to reply to the recent response filed to their motion to show authority and hereby grants this motion. The reply date is now February 24th, 2022.

It is so ORDERED.

Signed on _____ at Houston, Texas.

Honorable Alfred H. Bennett
United States District Judge