

**CAUSE NO. 2021-53589**

**TARWONIA ALBROW**

*Plaintiff,*

**v.**

**SANDY ANN FORSYTHE, NEW  
MILLENNIA PROPERTIES, LLC,  
JUSTINA DEPASQUALE,  
INDIVIDUALLY AND AS TRUSTEE  
FOR LOST THICKET TRUST**

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**IN THE DISTRICT COURT**

**157<sup>TH</sup> JUDICIAL DISTRICT**

**OF HARRIS COUNTY, TEXAS**

**AGREED MOTION FOR CONTINUANCE**

COME NOW Defendants, Sandy Ann Forsythe, New Millenia Properties, LLC., Justina De Pasquale, Individually, and as Trustee for Lost Thicket Trust, and Plaintiff Tarwonia Albrow (Plaintiff) (all together the “Parties”) and present this Agreed Motion for Continuance (the “Motion”) and in support thereof would show the Court the following:

**I. RELEVANT FACTS**

The discovery period is set to end in this case on October 14, 2022. The case is currently set for jury trial beginning November 14, 2022. The Parties are still engaged in active discovery. This is the first motion for continuance in this matter.

**II. ARGUMENTS & AUTHORITIES**

Texas Rule of Civil Procedure 251 states “no application for continuance shall . . . be granted except for sufficient cause supported by affidavit, or by consent of the parties, or by operation of law.” TEX. R. CIV. P. 251; *see Tenneco Inc. v. Enterprise Prods.*, 925 S.W.2d 640,

647 (Tex. 1996). All parties consent to the continuance. There is good cause to continue the trial setting. This continuance is not sought for purposes of delay, but solely so justice may be done.

### III. PRAYER

The parties respectfully request this court continue and remove the current November 14, 2022 trial setting and reset trial for a date not earlier than March 20, 2023.

Respectfully submitted,

**JEFFREY JACKSON & ASSOCIATES, PLLC**

/s/ Charles "Danny" Brooks

**JEFFREY C. JACKSON**

Texas Bar No. 24065485

**CHARLES "DANNY" BROOKS**

Texas Bar No. 24126064

Email: [jeff@jjacksonllp.com](mailto:jeff@jjacksonllp.com)

Email: [danny@jjacksonllp.com](mailto:danny@jjacksonllp.com)

2500 E TC Jester Blvd., Suite 285

Houston, Texas 77008

Telephone: 713-861-8833

Telecopier: 713-682-8866

ATTORNEYS FOR DEFENDANTS

**HAMILTON LEGAL SERVICES, PLLC**

  
\_\_\_\_\_  
**KiEtha "Kay" Hamilton**

Texas Bar No. 24097786

Email: [info@law-hls.com](mailto:info@law-hls.com)

700 Milam Street, Suite 1300

Houston, Texas 77002

Telephone: 832-429-8826

ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via Certified Mail, Return Receipt Requested, Facsimile and/or e-service on September 8, 2022.

**KiEtha “Kay” Hamilton**  
HAMILTON LEGAL SERVICES, PLLC  
700 Milam Street, Suite 1300  
Houston, Texas 77002  
Telephone: 832-429-8826  
Email: [info@law-hls.com](mailto:info@law-hls.com)  
*Attorney for Plaintiff Tarwonia Albrow*

*/s/ Charles “Danny” Brooks*  
**CHARLES “DANNY” BROOKS**

### **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.

Myra Nguyen on behalf of Jeffrey Jackson

Bar No. 24065485

myra@jjacksonllp.com

Envelope ID: 68071826

Status as of 9/8/2022 2:42 PM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Santana Jones		santana@law-hls.com	9/8/2022 2:31:06 PM	SENT
Kay Hamilton		info@law-hls.com	9/8/2022 2:31:06 PM	SENT