CAUSE NO. 2023-5111

SORRELS LAW,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
JULIE B. STEAMER,	§	
	§	
Defendant.	§	
	§	127th JUDICIAL DISTRICT

DEFENDANT'S AGREED MOTION FOR CONTINUANCE

NOW COMES Defendant JULIE B. Steamer ("Defendant" or "Ms. Steamer") and files this AGREED Motion for Continuance (the "Motion") to Answer or otherwise move against the Complaint in this Action, and would respectfully show the Court the following:

- 1. Defendant respectfully requests a 30-day continuance to file or otherwise move against Plaintiff Sorrels Law (*Pro Se*) ("Plaintiff" or "Sorrels Law") on the grounds that:
- 2. Defendant's understanding is that she needs to Answer or otherwise move against the Complaint is due on June 6, 2023.
- 3. Defendant is a cancer survivor who has been hospitalized multiple times over the last few months. Her husband accepted service of the Complaint while Defendant was in the ICU unit of the hospital. Defendant, like Plaintiff, is appearing *Pro Se* and will not be in the position to respond to the Complaint by June 6, 2023.
- 4. Defendant conferred with Plaintiff's managing partner, Randall O. Sorrels ("Mr. Sorrels"), about her current situation. He, on behalf of Plaintiff (*Pro Se*), has agreed to a 30-day continuance for Defendant to Answer or otherwise move against the Complaint.
 - 5. Mr. Sorrels, on behalf of Plaintiff (*Pro Se*), has also agreed to move this fee

dispute to the Houston Bar Association Fee Dispute Program. Arrangements will be made to have this matter heard before the fee dispute board.

WHEREFORE PREMISES CONSIDERED, Defendant requests the Court to Grant this Motion for Continuance.

Respectfully submitted,

JULIE B. STEAMER (PRO SE)

86 Fleet Place, Ste. 32E Brooklyn, NY 11201

(917) 664-1305

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Defendant Julie Steamer (Pro Se)

CERTIFICATE OF CONFERENCE

The undersigned certified that on the 1st day of June, 2023, I communicated with Randall O. Sorrels, managing partner of Plaintiff Sorrels Law (*Pro Se*) as to the foregoing motion and he, on behalf of Plaintiff (*Pro Se*) does not object to the motion.

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2023, a true and correct copy of the foregoing document was served to all counsel of record, in accordance with the Texas Rules of Civil Procedure, by service via the court's electronic filing system and/or email.

Julie B. Steamer (Pro Se)