# EXHIBIT "SORRELS CLIENTS CRAFT AND DEMMING"

- Big Law
  - BakerHostetler
  - Boies Schiller Flexner LLP
  - Gibson Dunn
    - Allyson Ho
    - Orin Snyder
  - Goodwin Law's Hall of Shame
    - Who is Catalina Azuero?
    - Who is Lawyer Alexis Susan Coll-Very?
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  - Is Texas Attorney General Ken Paxton a Criminal?
- SALOONS
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- MOVIES
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**Gov Abbott** Attorney Randy Sorrels and his Client, Felon Jhalen Demming Walk Into His Mom's Court in Harris County

Randy Sorrels also appeared for opposing side in auto case involving the Judge, Tamika Craft Demming and her Mother – but only to aid Judge.

# By justicefortexas

Posted on August 21, 2023

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LIT COMMENTARY

Accepted filing not shown on Judge Tami Craft's Harris County District Court docket a day later. Obtaining a submission date from the missing Clerk on Thursday should not prevent the motion from being filed if the notice date provided is somehow not available contrary to the law. **pic.twitter.com/fGZhILCc7y** 

lawsinusa (@lawsinusa) August 22, 2023

202266491 - DEMMING, JHALEN vs. ROAD MONSTER EXPRESS LLC (D/B/A HUSAM HUSANI) (Court 127, JUDGE RAVI SANDILL)

Aug 2, 2023
Designation of Lead Counsel

May 17, 2023 Exhibit C-12935 Jhalen Demming – CA North Houston Imaging Center

Sorrels Residence; 3642 Inverness Drive Houston, TX 77019 (\$4m) Sorrels Law Firm Donation to Judge Tamika Craft (08/03/2022)

**Flashback:** Above the Law State Bar President-Elect Randall O. Sorrels Walks Out of Video Deposition

202311266 - KRUCKEMEYER, ROBERT J vs. BLOGGER INC D/B/A LAWIN TEXAS.COM (Court 189, JUDGE TAMI CRAFT)

# MOTION TO DISQUALIFY RANDALL O. SORRELS OF SORRELS LAW AS LEAD COUNSEL FOR PLAINTIFF (AUG. 21, 2023)

Defendants Mark Burke, individually, and on behalf of Blogger Inc. ("Defendants" or "media defendants"), file this Motion to Disqualify opposing counsel Randall O. Sorrels and his law firm Randall O. Sorrels, PC, DBA "Sorrels Law" ("Randy"), registered in Harris County as lead counsel for Plaintiff.

## RANDALL O. SORRELS RELATIONSHIP WITH PARTIES

Randy's familiarity extends across both sides of the negotiating table, a fact acknowledged by all parties involved. His close friendship with Robert J. Kruckemeyer ("Bob"), as referenced in previous legal documents, attests to his well-established connections. Additionally, his former law firm had previously and successfully represented the business interests of the Burke family. Notably, this connection enabled media defendants to observe the seamless transfer of the prior firm's client list when he transitioned from Abraham Watkins to his current firm, Sorrels Law.

It remains undisclosed whether this contact list migration occurred with proper authorization. However, what is undisputedly relevant is that a novel email list linked to a new entity mandates the procurement of individual consent from the list's members, including their corresponding email addresses.

Regrettably, the imperative process of notification, as precisely outlined on LawsInTexas.com ("LIT"), was never executed. Consequently, this omission stands in violation of established legal norms. Reference is made to **the article** titled "Sorrels Law Violates Email CAN-SPAM Act," which outlines the infraction in detail.

Relatedly, Abraham Watkins is named as the first and highest donor to Judge Craft in 2023, with a \$5,000 contribution. However, this was not a donation prior to the election, but received on **June 20, 2023** and while Judge Craft is a sitting judge of this Court.

RANDY SORRELS PERSONAL RELATIONSHIP WITH JUDGE TAMIKA 'TAMI' CRAFT OR TAMIKA 'TAMI' CRAFT-DEMMING

Following her recent appointment to Court 189 in January 2023, Judge Tami Craft – as she prefers to be addressed – was assigned at random to preside over the present civil action initiated by the pro se litigant and Texas lawyer, Bob. Subsequently, Bob independently amended his initial petition on a Sunday afternoon, as evidenced in "Plaintiff's First Amended Original and Application for Permanent Injunction," Image No. 108501215, dated June 5, 2023.

Within this amended petition, he stipulated that Randy would join as legal counsel for the duration of the ongoing proceedings. It is noteworthy that the media defendants has already raised concerns about the legitimacy of this appointment in prior submissions, a fact which this court is invited to acknowledge as a matter of judicial notice. Reference can be made to Ex parte Daniels, No. 05-21-01075-CR, at \*4 (Tex. App. May 26, 2022), wherein the principle is established that "A court may take judicial notice of its own records."

Subsequent to recent investigations by the Defendants and Counter-Plaintiffs, it has come to light that a personal relationship exists between Judge Craft and Randy. This relationship extends to a family member whom Randy is presently representing —specifically, Jhalen Demming—in an active civil proceeding under the docket number 202266491, titled "DEMMING, JHALEN vs. ROAD MONSTER EXPRESS LLC (D/B/A HUSAM HUSANI)" and assigned to Court 127. It has been alleged that Jhalen Demming is the offspring of Judge Tami Craft-Demming and her spouse, Marcus Demming, as referenced in case 202280126, "CRAFT-DEMMING, TAMIKA vs. DEMMING, MARCUS," which pertains to divorce proceedings and was officially dismissed on March 13, 2023, due to want of prosecution.

Evident from the submissions in the present case, which revolves around an automobile accident, a dispute emerges regarding the authenticity of the injuries sustained by Jhalen Demming, the medical treatment undergone, and the related medical expenses. Given Sorrels' reputation as a renowned personal injury law firm, it is reasonable to surmise that Jhalen may have entered into an engagement agreement with Sorrels on a contingency fee basis.

Relatedly, Randy was notably not named as counsel for defendants in a civil proceeding where Judge Craft was a Plaintiff, 201972692 – CRAFT, PAMELA vs. AUTO CLUB MUTUAL INSURANCE COMPANY (Court 164) (Dismissed for want of prosecution on May 25, 2023).

However, Randy injected himself without notice or authority as counsel to aid the Judge in dismissal (with her approval) of certain claims, as detailed in LIT's **article** "As Judge Tami Craft and Pamela Craft's Auto Accident Case Collapsed, In Stepped Randy Sorrels With an Offer".

Also relevant to this motion is Randy donated \$1,000 to Judge Craft. However, this was not a donation prior to the election, but received on **January 25, 2023** and while Judge Craft is a sitting judge of this Court.

That stated, there was a donation during the 2022 judicial campaign itself. On Aug. 20, 2022 "Sorrels Law Firm" **donated \$789.18**. However, questionably this has been **removed** from the Transparency.Org website, despite LIT's **screenshot** taken on July 16, 2023 confirming the donation.

## APPLICABLE PROFESSIONAL RULES AND LAWS

Under Texas Rule of Civil Procedure 18b(a), "**a judge is disqualified** in any proceeding in which either of the parties may be related to the judge by affinity or consanguinity within the third degree".

Let's break down these terms;

**Parties:** In a legal context, "parties" refer to the individuals or groups who are involved in a legal dispute or case. They could be plaintiffs (those bringing the case to court) or defendants (those being sued or accused).

**Judge:** The judge is the legal authority presiding over the case. They are responsible for making impartial decisions and ensuring that the legal process is fair and just.

**Affinity:** Affinity refers to relationships formed through marriage. For example, a person's spouse's relatives are considered their affines. Affinity is distinct from consanguinity, which refers to blood relationships.

**Consanguinity:** Consanguinity refers to blood relationships – being related by birth, typically through shared parentage.

**Third Degree:** In genealogy and legal terminology, degrees of relationship indicate how closely two individuals are related. The "third degree" refers to a level of relationship that is relatively distant. For example, a parent-child relationship is considered first degree, siblings are second-degree relatives, and third-degree relatives might include cousins or great-grandparents.

In this context, the focus here is on the judge's association with counsel and her family. See; TEXAS CODE OF JUDICIAL CONDUCT (As amended by the Supreme Court of Texas through **January 21, 2022**).

#### SUMMARY OF ARGUMENT

Randy is currently representing the judge's son in ongoing civil proceedings as previously mentioned. She has also had communications with Randy in her own case to allow him to dismiss claims on her behalf.

Consequently, this request to remove the legal representative aims to provide the media defendants with the essential recourse.

In light of the situation and the applicable code and canons such as 1, 2, 3(B)(5),(8) (discussing ex parte communications) and related responsibilities such as those

covered in (D) (financial activities) as an active Judge, it's apparent that this association significantly impacts the advancement of these proceedings due to concerns about partiality and bias.

This motion to disqualify counsel is therefore imperative to afford the media defendants the necessary relief, bolstered by adherence to professional regulations and Texas laws.

JUDGE MARC W BROWN SELF-RECUSES FROM IMPEACHMENT PROCEEDINGS OF TEXAS ATTORNEY GENERAL KEN PAXTON

Another pivotal aspect underscoring the significance of this motion pertains to the ongoing impeachment of the suspended Attorney General, Ken Paxton ("Paxton"). Notably, Senior Appellate Judge Marc W. Brown was originally slated to act as counsel for the President of the Senate in these proceedings. However, after an epiphany, Judge Brown suddenly remembered he donated \$250 towards former Texas Supreme Court Justice Eva Guzman's campaign to unseat Paxton, and has submitted **a letter** dated Saturday, August 19, 2023, withdrawing from the assignment to ensure there were "no distractions or allegations of favoritism or personal bias".

Considering Randy Sorrels' position as the **former** President of the State Bar of Texas (2019-2020), along with Judge Craft's status as a prominent public figure, it is imperative to ensure that there are no distractions or indications of preferential treatment and personal bias. This holds true when evaluating the media defendants' blog at LawsInTexas.com and considering the mission statement of Blogger Inc., which articulates their purpose as follows;

"LawsInTexas dot com is a trading identity that falls under the complete ownership of Blogger Inc., a registered nonprofit 501(c)(3) organization based in Delaware. Blogger Inc. is dedicated to enhancing civil rights, promoting access to justice, upholding ethical standards, fostering accountability, and driving social change by engaging stakeholders and the public through online media marketing and blogs. Operating independently as a non-profit blog and newsroom, Blogger Inc. produces investigative journalism in the public interest and offers educational resources to individuals, contributing to the betterment of the community."

Correspondingly to the impeachment trial, these ongoing proceedings hold significant public interest. It is vital that justice is served without compromise.

#### CONCLUSION

In light of the above facts, Randall O. Sorrels of Sorrels Law should be disqualified, and no lawyer from Randall O. Sorrels PC, DBA Sorrels Law may participate in these proceedings. As such, this motion should be timely GRANTED along with any and all relief this court may prescribe.

RESPECTFULLY submitted this 21st day of August, 2023.

Sorrels Law Firm Donation to Judge Tamika Craft (08/03/2022) Sorrels Residence; 3642 Inverness Drive Houston, TX 77019 (\$4m) Judge Susan Brown Hand-Picked Dishonorable Dan Hinde as a DEFENDANT

Chief Admin. Judge Susan Brown **is Married to** Judge Marc W. Brown Former judge declines to serve as Lt. Gov. Dan Patrick's adviser for Ken Paxton impeachment trial

A day after Patrick announced the appointment, Marc Brown declined it, citing a campaign contribution he made to Paxton's GOP primary opponent in 2021.

AUG. 19, 2023 | REPUBLISHED BY LIT: AUG. 21, 2023

A former state appeals court judge on Saturday turned down an appointment to serve as an adviser to Lt. Gov. Dan Patrick during the upcoming impeachment trial of indicted Attorney General Ken Paxton.

Just a day earlier, Patrick had named Marc Brown, a former Republican justice on the 14th Court of Appeals from Harris County, to be his counsel during the trial scheduled to begin Sept. 5.

Brown's announcement that he would not participate came suddenly after The Texas Tribune reached out about a campaign donation he made in 2021 to a Paxton political opponent.

In a letter Saturday to Patrick declining the appointment, Brown cited the \$250 contribution that he and his wife made in 2021 to the campaign of Eva Guzman, a former state Supreme Court justice who tried to unseat Paxton in the Republican primary.

Brown said he had not actively campaigned for any candidate since becoming a district judge in 2010.

"I did not recall that during our meetings with your staff,"

Brown wrote about the contribution.

"I have full confidence in my ability to fairly offer legal advice in this matter. However, the proceedings commencing on Sept. 5, 2023 are far too important to the State of Texas for there to be any distractions involving allegations of favoritism or personal bias on my part."

Patrick said Friday he had picked Brown "after several months of searching."

Trial rules grant Patrick — who as the leader of the Senate serves as the impeachment trial's presiding officer — the option of selecting his own legal counsel.

"I was looking for a candidate with real-life courtroom experience as a lawyer and a judge who would serve as counsel and work side-by-side with me through this process,"

Patrick said in a statement.

"Justice Brown meets these criteria with his years of front-line experience as a courtroom lawyer and trial court judge and also brings a well-rounded perspective from his experience as a former appellate justice."

The House impeached Paxton in May, alleging a yearslong pattern of misconduct and lawbreaking. He was immediately suspended from office on a temporary basis, and the trial will determine whether he will be permanently removed.

Paxton faces 20 articles of impeachment that accuse him of bribery and abusing his office.

The trial rules, which the Senate approved in June, say that the presiding officer "may select legal counsel licensed in the State of Texas who is not a registered lobbyist in this State."

Brown served as a district court judge in Harris County, then won a seat on the 14th Court of Appeals, where he served from 2013 to 2019.

He lost reelection in 2018, one of many GOP judges in the Houston area unseated as Democrat Beto O'Rourke came close to unseating U.S. Sen. Ted Cruz, R-Texas.

# **Credit: Texas Tribune**

HCA Healthcare and Serpe Andrews: Court 189 Lawsuit by Sorrels Law Assigned to New Judge Craft (2023)

Tamika Craft aka Tami Craft-Demming is a judge of the Texas 189th District Court. She assumed office on January 1, 2023.

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Flashback: Above the Law State Bar President-Elect Randall O. Sorrels Walks Out of Video Deposition

Attorney Randy Sorrels and his Lawyer Spouse Alex Ain't Pleased with River Oaks Home Remodeling

Laws In Texas first started as an independent investigative blog about the Financial Crisis and how the Banks and Government are colluding against the citizens and homeowners of the State of Texas, relying upon a system of #FakeDocs and post-crisis legal precedents, specially created by the Court of Appeals for the Fifth Circuit to foreclose on homeowners around this great

State. We are not lawyers. We do not offer legal advice. That stated, LIT's Blog has grown tremendously during the three or so years it has been operating and our reach is now nationwide as we expand via our micro-blogs in various states. Join us as we strive to bring back justice and honor to our Judiciary and Government employees, paid for by Citizens.

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