

CAUSE NO. 2023-20456

CIRCLE T RESERVES L.L.C,
EARNEST J. TAYLOR and
LECIA A. TAYLOR

Plaintiffs,

vs.

AMG TEXAS CAPITAL L.L.C.

Defendant.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

80th JUDICIAL DISTRICT

MOTION TO SEEK LEAVE TO WITHDRAW AS COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

Counsel Gagan Khan of GK Law PLLC (“Movant”) files this Motion to Seek Leave to Withdraw as Counsel for Plaintiffs Circle T Reserves LLC, Earnest J. Taylor, and Lecia A. Taylor (“Clients”). Movant would show the Court as follows:

1. As provided in Rule 10 of Texas Rules of Civil Procedure and Rule 1.15(b)(6) and (7) of the Texas Disciplinary Rules of Professional Conduct, Movant states the following facts which establish good cause for this request.
2. Movant and Clients are having serious communication issues. Additionally, continued representation of Clients would cause an increased financial burden on Movant.
3. Movant has informed Clients of the firm’s intent to withdraw. Clients have not communicated their position on this Motion is **unknown at this time**.
4. The last known address of Clients is **20615 Leafdale Court, Humble, Texas 77338-2760**. Plaintiffs Earnest J. Taylor, and Lecia A. Taylor’s email address is **lisaintexas62@gmail.com**. Plaintiffs Earnest J. Taylor, and Lecia A. Taylor’s telephone is **281-979-3065**. Circle T Reserves, LLC is a limited liability company whose managing member is Plaintiff, Earnest J. Taylor and can be contacted by mailing, emailing or calling the number listed above.

5. The trial on this case is scheduled for **June 17, 2024**.
6. Discovery deadline in the case is on **April 15, 2024**.
7. On entry of an order granting this Motion and discharging Movant as attorney of record for Clients, Movant will provide Clients with originals of all documents that have been filed, and discovery that has been produced or sent in this case. Movant has previously provided Clients with all the clients' documents and all pleadings filed in this case through DropBox.
8. The Defendant's legal counsel, James A. Tatem and C. Scott Mann, Jr., have been provided with notice of this Motion. They do **not oppose this Motion** as indicated by their signatures below.
9. This Motion is not sought for delay but so that justice may be served.
10. **NOTICE TO CLIENTS:** You are hereby notified that this Motion for Withdrawal of Counsel is set for hearing at the **time and place stated in the notice of hearing**. A copy of the notice of hearing will be delivered to all of you. A copy of the docket control order, all pending motions and their hearing/submission dates has been provided to you with this Motion.

PRAYER

Movant asks that the Court grant this Motion and allow the withdrawal of Movant Gagan Khan, and Randall Clark of GK Law PLLC and GK Law PLLC as counsel for Plaintiffs Circle T Reserves LLC, Earnest J. Taylor, and Lecia A. Taylor. Movant seeks any other relief permitted by law.

Respectfully submitted,

GK LAW, PLLC

/s/ Gagan Khan

GAGAN KHAN

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RANDALL B. CLARK

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AGREED AS TO FORM:

/s/ James A. Tatum*
James A. Tatem

**signed with permission*

/s/ C. Scott Mann, Jr.
/s/ C. Scott Mann, Jr.*
C. Scott Mann, Jr.

**signed with permission*

Unofficial Copy Office of Marilyn Burgess District Clerk

CERTIFICATE OF CONFERENCE

The undersigned attorney hereby certifies to the Court that my office conferred with opposing counsel on January 19, 2024, regarding their position on this Motion and we were informed on January 21, 2024 that they did not oppose the motion.

/s/ GAGAN KHAN
GAGAN KHAN

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CERTIFICATE OF SERVICE

I certify that on January 25, 2024, a true and correct copy of this pleading was served upon all counsel and/or parties of record in accordance with the Texas Rules of Civil Procedure.

/s/ Gagan Khan

GAGAN KHAN

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Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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.

GK Law E-File Texas on behalf of Randall Burton Clark

Bar No. 4294900

efile@gagan.law

Envelope ID: 83815253

Filing Code Description: Motion (No Fee)

Filing Description: Motion to Seek Leave to Withdraw as Counsel

Status as of 1/26/2024 8:10 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Gagan Khan	24090207	info@gagan.law	1/25/2024 5:42:37 PM	SENT
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