

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

MELISSA DAIGLE,

Plaintiff,

v.

AMERIHOM MORTGAGE
COMPANY, LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§

Civil Action No. 3:22-cv-133

JOINT MOTION FOR CONTINUANCE

Defendant AmeriHome Mortgage Company, LLC (“Defendant”) and Plaintiff Melissa Daigle (“Plaintiff” and collectively the “Parties”) file this their Joint Motion for Continuance requesting continuance of all remaining deadlines, the Final Pretrial Conference and Bench trial setting pending ruling on summary judgment, and in support thereof respectfully show the Court as follows:

1. This matter is set for Docket Call on July 31, 2023. [Doc. 13]. The Parties are to exchange all pretrial materials by July 17, 2023. *Id.*
2. Defendant has a Motion for Summary Judgment. [Doc. 17]. The Motion is now fully brief, as Plaintiff filed her Response to the Motion for Summary Judgment on June 22, 2023 [Doc. 20] and Defendant filed its Reply in Support of Motion for Summary Judgment on June 30, 2023 [Doc. 21] pursuant to the Court’s Order. [Doc. 19].
3. In order to conserve judicial resources and attorney’s fees, the parties request that the Court continue the current Docket Call from its setting of July 31, 2023, in order to allow the court to give due consideration to the pending Motion for Summary Judgment.

4. This motion is not brought for purposes of delay. It is brought so that justice may be done and to conserve the valuable resources of this Court. The Parties request that the Court grant the continuance of the remaining deadlines and cancel the currently set Docket Call.

For these reasons, the Parties pray that the Court grant this Motion and enter an order in accordance herewith.

Respectfully submitted,

By: /s/ Shelley L. Hopkins
Shelley L. Hopkins – *Attorney In Charge*
State Bar No. 24036497
SD ID No. 926469
HOPKINS LAW, PLLC
3 Lakeway Centre Ct., Suite 110
Austin, Texas 78734
(512) 600-4320
BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP - *Of Counsel*
ShelleyH@bdfgroup.com
shelley@hopkinslawtexas.com

Robert D. Forster, II
State Bar No. 24048470
SD ID No. 2647781
BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP
4004 Belt Line Road, Ste. 100
Addison, Texas 75001
(972) 386-5040
RobertFO@bdfgroup.com

ATTORNEYS FOR DEFENDANT

By: /s/ Robert C. Vilt
Robert C. Vilt
State Bar No. 00788586
SD ID No. 20296
VILT LAW, P.C.
5177 Richmond Avenue, Suite 1142
Houston, Texas 77056
Tel: (713) 840-7570
Fax: (713) 877-1827

clay@viltlaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and will send a true and correct copy to the following:

Robert C. Vilt
Vilt Law, P.C.
5177 Richmond Avenue, Suite 1142
Houston, Texas 77056
clay@viltlaw.com

/s/ Shelley L. Hopkins
Shelley L. Hopkins