

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**DHI HOLDINGS, LP; AND BRANDON
MENDENHALL,**

Plaintiffs,

v.

**U.S. BANK NATIONAL ASSOCIATION
AS TRUSTEE OF SPARTAN FUNDING I
TRUST; AND FAY SERVICING, LLC,**

Defendants.

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Civil Action No. 4:24-cv-03914

**DEFENDANT’S UNOPPOSED MOTION TO WITHDRAW AND FOR SUBSTITUTION
OF COUNSEL**

Defendant U.S. Bank National Association as Trustee of Spartan Funding I Trust (“Defendant”) files this Unopposed Motion to Withdraw and for Substitution of Counsel (the “Motion”) and respectfully requests the withdrawal of Crystal G. Gibson of Mackie Wolf Zientz & Mann, P.C. (“Mackie Wolf”), and the substitution of Robert T. Mowrey, Matthew K. Hansen, and Helen O. Turner of Locke Lord LLP (“Locke Lord”) as its counsel of record. In support of this Motion, Defendant shows the Court as follows:

1. Defendant is presently represented by Ms. Gibson of Mackie Wolf. Her address is 14160 North Dallas Parkway, Suite 900, Dallas, Texas 75254. Defendant has retained new counsel to represent its interests in this case—Mr. Mowrey, Mr. Hansen, and Ms. Turner of Locke Lord. Mr. Mowrey, Mr. Hansen, and Ms. Turner of Locke Lord are admitted to practice law in the Southern District of Texas, and they have consented to serve as counsel for Defendant in this lawsuit. Their contact information is as follows:

Robert T. Mowrey – Attorney-in-Charge

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Matthew K. Hansen

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2. Plaintiffs DHI Holdings, LP and Brandon Mendenhall (collectively, “Plaintiffs”) are unopposed to the relief requested in this Motion.

3. Granting this Motion will not harm or prejudice Plaintiffs or any other party. Nor will the granting of this Motion cause undue delay.

For these reasons, Defendant respectfully requests that this Motion be granted, that Ms. Gibson be withdrawn as counsel of record for Defendant, that the Court order that the docket be amended to reflect that Ms. Gibson has withdrawn as counsel for Defendant, and that Ms. Gibson no longer need to be noticed of any pleadings, motions, or other documents filed or served in this case. Defendant also requests that Mr. Mowrey, Mr. Hansen, and Ms. Turner be substituted in as counsel for Defendant, that they be provided with copies of any pleadings, motions, or other documents in this case as counsel for Defendant, and that Defendant be granted such other and further relief to which they may be justly entitled.

Respectfully submitted,

/s/ Helen O. Turner

Robert T. Mowrey – Attorney-in-Charge

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**SUBSTITUTING COUNSEL FOR
DEFENDANT**

-AND-

/s/ Crystal G. Gibson with permission

Crystal G. Gibson

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**WITHDRAWING COUNSEL FOR
DEFENDANT**

CERTIFICATE OF SERVICE

I hereby certify that, on November 5, 2024, I conferred with counsel for Plaintiffs regarding the relief requested in this Motion, and he is not opposed to this Motion.

/s/ Helen O. Turner

Substituting Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that on November 5, 2024, a true and correct copy of the foregoing document was delivered to the following counsel of record *via CM/ECF, CMRRR, and/or email* consistent with the Federal Rules of Civil Procedure.

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Withdrawing Counsel for Defendant

/s/ Helen O. Turner

Substituting Counsel for Defendant