

CAUSE NO. 2023-68280

**TEXAS REAL ESTATE
DEVELOPMENTS, L.P.**

Petitioner/Defendant

vs.

VICTOR ANTHONY CHARLES

Respondent/Plaintiff

CONSOLIDATED WITH:

CAUSE NO. 2023-68311

**TEXAS REAL ESTATE
DEVELOPMENTS, L.P.**

Plaintiff

vs.

**REBECCA JEAN DUFFY, DUFFY
MANAGEMENT SERVICES, LLC,
VICTOR ANTHONY CHARLES,
NEPTUNE ONE, LLC, RACHEL
LUNA, PT-PATRIOT TITLE, LLC, SB
HOUSE SOLUTIONS, LLC, TEXAS
TAX NET, LLC, AND M.P. SEAGO
ENTERPRISES, INC.**

Defendants

IN THE DISTRICT COURT

OF HARRIS COUNTY, TEXAS

215TH JUDICIAL DISTRICT

IN THE DISTRICT COURT

OF HARRIS COUNTY, TEXAS

80TH JUDICIAL DISTRICT

**FIRST AMENDED UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR
TEXAS REAL ESTATE DEVELOPMENTS, L.P.**

Attorneys Andrew M. Scott, John W. Brooks and Gordon & Rees, LLP file this First Amended Unopposed Motion to Withdraw as Counsel (“Motion”) for Texas Real Estate Developments, L.P. (“TRED”) in the above-referenced cause, and in support thereof, show as follows:

1. Andrew M. Scott, John W. Brooks and the firm of Gordon & Rees, LLP (collectively "TRED's Counsel") represent TRED. Good cause exists for their withdrawal as counsel because a conflict has arisen between TRED's Counsel and TRED necessitating withdrawal. The withdrawal is not sought for delay.

2. A copy of this Motion has been delivered to TRED in person by courier, by certified mail and email. TRED has been notified of its right to object to this Motion. TRED has advised TRED's Counsel that TRED is unopposed to this Motion.

3. TRED's last known address and mailing address is 4702 Old Spanish Trail, Houston, Texas 77021. Plaintiff's telephone number is ***-***-3274. TRED's representative is Jeff Burrell and his email address is jburrell13@aol.com.

4. TRED has been advised of all pending settings and deadlines, which are as follows:

January 13, 2025	Submission Date of Victor Charles' Motion for New Trial
January 21, 2025	Oral Hearing on Rebecca Duffy's Motion to Dismiss / Abate
February 17, 2025	Pre-Trial Conference
February 24, 2025	Trial

5. The withdrawal of TRED's Counsel will not result in undue delay or in prejudice to TRED and is in the interest of justice.

6. The undersigned counsel has previously advised TRED that please be advised that pursuant to applicable Texas law, TRED must substitute new counsel within 30 days of the date of the undersigned's withdrawal or the Court will enter judgment against TRED.

7. Accordingly, Andrew M. Scott, John W. Brooks and the law firm of Gordon & Rees, LLP request that this Court enter an Order permitting them to withdraw as counsel for TRED in this case, and for such other and further relief to which they may be justly entitled.

Respectfully submitted,

GORDON & REES LLP

By: /s/ Andrew M. Scott

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ATTORNEYS FOR TEXAS REAL ESTATE DEVELOPMENTS, L.P.

CERTIFICATE OF CONFERENCE

On January 7, 2025, I conferred with counsel for Rebecca Jean Duffy and Duffy Management Services, LLC, and they are unopposed to the relief sought in this Motion.

On January 8, 2025, I conferred with Victor Anthony Charles, and he is unopposed to the relief sought in this Motion.

On January 7, 2025, I attempted to confer with counsel for Neptune One, LLC regarding the relief sought in this Motion, but no response was received. Victor Anthony Charles is the representative of Neptune One, LLC, and given he is unopposed to this Motion, it is also assumed that Neptune One, LLC is likewise unopposed.

On January 8, 2025, I conferred with counsel for M.P. Seago Enterprises, Inc. and it is unopposed to the relief sought in this Motion.

On January 6 and 7, 2025, I conferred with TRED's representative Jeff Burrell, and TRED is unopposed to the relief sought in this Motion.

/s/ Andrew M. Scott
Andrew M. Scott

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing document has been served upon all parties and/or counsel of record in accordance with the Texas Rules of Civil Procedure on January 14, 2025.

/s/ Andrew M. Scott
Andrew M. Scott

Unofficial Copy Office of Marilyn Burgess District Clerk

Automated Certificate of eService

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

Gloria Flores on behalf of Andrew Scott

Bar No. 24075042

gflores@grsm.com

Envelope ID: 96175372

Filing Code Description: No Fee Documents

Filing Description: First Amended Unopposed Motion to Withdraw as Counsel for Texas Real Estate Developments, L.P.

Status as of 1/14/2025 10:53 AM CST

Case Contacts

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