

CAUSE NO. 2022 – 68763

HOUSTON SECURED DEVELOPMENT  
PARTNERS, LLC

Plaintiff,

HSDP BAM LLC, et. al.

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IN THE DISTRICT

FOR HARRIS COUNTY,  
TEXAS

151ST JUDICIAL  
DISTRICT

**DEFENDANT’S MOTION TO SUBSTITUTE COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW JCLZ LEGACY, LLC as Defendant, by and through counsel of record, Derek H. Deyon, and files this Motion to Substitute Counsel. Plaintiff is Houston Secured Development Partners, LLC.

1. Defendant, JCLZ LEGACY, LLC moves this honorable Court to allow Attorney Warren Fitzgerald Muhammad to withdraw from representing Defendant, JCLZ LEGACY, LLC (JVLZ LEGACY, LLC) in this matter; and to allow Attorney Derek H. Deyon of The Deyon Law Group, PLLC to substitute into this matter as counsel of record for Defendant, JCLZ LEGACY, LLC.

2. Defendant, JCLZ LEGACY, LLC consents and agrees to this substitution.

3. This substitution will not interfere with the Court’s orderly administration of this case.

RESPECTFULLY SUBMITTED

**THE DEYON LAW GROUP, P.L.L.C.**

*/s/ Derek H. Deyon*

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Attorney in Charge for Defendant  
JCLZ LEGACY, LLC

**LAW OFFICE OF WARREN FITZGERALD  
MUHAMMAD**

*/s/ Warren Fitzgerald Muhammad* (by  
permission)

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Withdrawing Attorney for JCLZ LEGACY, LLC  
(JVLZ LEGACY, LLC)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2025, I served a true a correct copy of the foregoing document on all attorneys of record *via* E – Service in accordance with Rule 21a of The Texas Rules of Civil Procedure.

*/s/ Derek H. Deyon*

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DEREK H. DEYON

**CERTIFICATE OF CONFERENCE**

I hereby certify that Defendant will supplement this motion to reflect whether the parties in this case are opposed, unopposed, or agreed to the disposition of this motion.

*/s/ Derek H. Deyon*

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DEREK H. DEYON

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Filing Code Description: Motion (No Fee)  
Filing Description: Defendant's Motion to Substitute Counsel  
Status as of 1/22/2025 8:29 AM CST

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