

**CAUSE NO. 24-CR-5033**

THE STATE OF TEXAS	*	IN THE DISTRICT COURT OF
	*	
VS.	*	GALVESTON COUNTY, TEXAS,
	*	
ANDREW LEHMAN	*	122ND JUDICIAL DISTRICT
	*	

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**DEFENDANT'S MOTION FOR  
SUBSTITUTION OF COUNSEL**

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TO THE HONORABLE DISTRICT JUDGE JETH JONES:

COMES NOW ANDREW LEHMAN, Defendant in the above styled and numbered cause, to present this *Motion for Substitution of Counsel*, which seeks the designation of Paul Morgan as counsel of record for the Defendant. In support thereof, Defendant would show the Court as follows:

**I. Relevant Facts**

Defendant has been charged with the felony offense of child endangerment, alleged to have occurred in Galveston County, Texas.

Defendant was initially been appointed Pedro P. Ruiz (State Bar No. 17386820) in the above case. Defendant has now retained Paul Morgan Law Office, PLLC, to represent him.

## **II. Request for Designation of New Counsel**

Defendant now respectfully requests that Paul Morgan (State Bar No. 24077192) be designated as attorney of record for him in the above cause.

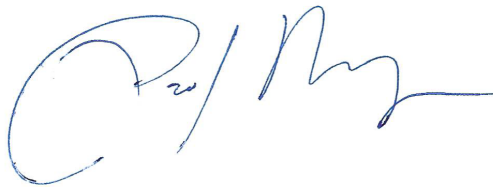
In addition, Defendant respectfully requests that Pedro P. Ruiz be relieved of all professional duty owed to Defendant.

### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this Honorable Court will, in all things, **GRANT** this motion, designate Paul Morgan lead counsel of record for Defendant in the above styled and numbered cause, and that the Court FURTHER GRANT any additional relief to which Defendant may be legally and justly entitled.

DATED this 19th day of May, 2025.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to be 'C. Ruiz', is written above a solid black horizontal line.

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PAUL MORGAN  
State Bar No. 24077192  
Lead Counsel  
Paul Morgan Law Office, PLLC  
1523 Yale Street  
Houston, Texas 77008  
☎ (281) 346-4351  
📠 (713)-581-3360  
✉ paul@themorganlawfirm.com

**NEW COUNSEL FOR THE DEFENDANT  
ANDREW LEHMAN**

AGREED AS TO FORM & SUBSTANCE:

*/S/ Pedro Luis*  
(w/ permission)

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PEDRO P. LUIZ  
State Bar No. 17386820  
1813 61st Street  
Galveston, Texas 77551  
☎ 409-740-1111  
✉ pedro@zendehdel.com  
PREVIOUS COUNSEL FOR  
DEFENDANT

*/S/ Andrew Lehman*  
(w/ permission)

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ANDREW LEHMAN  
DEFENDANT

## **CERTIFICATE OF SERVICE**

I hereby certify that at the time I filed this motion with the Court, a true and correct copy of the forgoing was served on the attorney representing the State via the email address listed on the State's e-filing portal.

A handwritten signature in black ink that reads "Matthew Novak". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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Matthew Novak  
State Bar No. 24104055  
Associate Attorney  
Paul Morgan Law Office, PLLC  
✉ matt@themorganlawfirm.com

**ON BEHALF OF PAUL MORGAN  
NEW COUNSEL FOR THE DEFENDANT  
BETHANY FERRELL**

### **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.

Matthew Novak

Bar No. 24104055

matt@themorganlawfirm.com

Envelope ID: 101031059

Filing Code Description: Motion to Substitute Counsel (Odyssey)

Filing Description: Defendant's Motion for Substitution of Counsel

Status as of 5/20/2025 8:12 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Paul M.Morgan		paul@themorganlawfirm.com	5/20/2025 8:07:13 AM	SENT