

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

**ALBERTO PATINO,  
MARIA DEL ROSARIO MARTINEZ,  
MARIA MARI,  
RODOLFO R. TENREIRO, and  
PATRICIA GONZALES,  
Plaintiffs,**

**VS.**

**Civil Action No. 4:14-CV-03241-LHR**

**CITY OF PASADENA,  
Mayor JOHNNY ISBELL,  
Council Members ORNALDO YBARRA,  
BRUCE LEAMON, DON HARRISON,  
PAT VAN HOUTE,  
CODY RAY WHEELER, PHIL  
CAYTEN, STEVE COTE, and  
DARRELL MORRISON,  
*Defendants.***

**MOTION TO WITHDRAW AND SUBSTITUTE  
COUNSEL FOR DEFENDANT**

TO THE HONORABLE JUDGE LEE H. ROSENTHAL:

The City of Pasadena requests that the Court permit Gene Locke to withdraw as counsel for Defendant in this proceeding. In January of 2016, Mr. Locke was appointed as interim County Commissioner for Harris County Precinct 1 following the untimely death of Commissioner El Franco Lee. Mr. Locke has recently announced his intention to seek election to a full term as Commissioner of Precinct 1. Due to the significant time

constrains and responsibilities associated with government service, Mr. Locke is no longer able to serve as legal counsel in this matter.

Defendant requests that the Court permit Mr. Locke's law partner, Kelly Sandill, of the law firm Andrews Kurth LLP to substitute for Mr. Locke as counsel of record for Defendant. Ms. Sandill is a member in good standing of State Bar of Texas and is admitted to practice before this Court. Her contact information is as follows:

Kelly Sandill  
Texas State Bar No. 24033094  
Southern District No. 38594  
ANDREWS KURTH LLP  
600 Travis, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4181  
Facsimile: (713) 238-7304  
*ksandill@andrewskurth.com*

C. Robert Heath of Bickerstaff, Heath, Delgado, Acosta LLP will continue to serve as lead counsel and attorney-in-charge for Defendant. Ms. Sandill will serve in an of counsel capacity along with Gunnar P. Seaquest of Bickerstaff, Heath, Delgado, Acosta LLP, and Kathryn K. Ahlrich of Andrews Kurth LLP, each of whom has already appeared as counsel for Defendant in this proceeding.

This request for withdrawal and substitution of counsel is made with the consent and knowledge of Defendant and will not cause delay. Counsel of record for Plaintiffs has been contacted and does not oppose the requested withdrawal and substitution.

OF COUNSEL:

GUNNAR P. SEAQUIST  
Texas State Bar No: 24043358  
Southern District No: 1140733  
*gseaquist@bickerstaff.com*  
BICKERSTAFF HEATH  
DELGADO ACOSTA LLP  
3711 S. MoPac Expressway  
Building One, Suite 300  
Austin, Texas 78746  
Telephone: (512) 472-8021  
Facsimile: (512) 320-5638

KELLY SANDILL  
State Bar No. 24033094  
Southern District No. 4969  
*ksandill@andrewskurth.com*  
KATHRYN K. AHLRICH  
State Bar No. 24063686  
Southern District No. 1242003  
*katieahlrigh@andrewskurth.com*  
ANDREWS KURTH LLP  
600 Travis, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4181  
Facsimile: (713) 238-7304

Respectfully submitted,

By: /s/ C. Robert Heath  
C. ROBERT HEATH  
Texas State Bar No. 09347500  
Southern District No. 13381  
*Bheath@bickerstaff.com*  
BICKERSTAFF HEATH  
DELGADO ACOSTA LLP  
3711 S. MoPac Expressway  
Building One, Suite 300  
Austin, Texas 78746  
Telephone: (512) 472-8021  
Facsimile: (512) 320-5638

**ATTORNEY-IN-CHARGE FOR  
DEFENDANT**

AGREED:

/s/ Gene Locke

Gene Locke

State Bar No. 12461900

Southern District No. 24259

*genelocke@andrewskurth.com*

600 Travis, Suite 4200

ANDREWS KURTH LLP

Houston, Texas 77002

Telephone: (713) 220-3956

Facsimile: (713) 220-7294

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with counsel of record for Plaintiffs, who stated that she is unopposed to this motion.

/s/ Kathryn K. Ahlrich

Kathryn K. Ahlrich

**CERTIFICATE OF SERVICE**

I certify that on April 25, 2016 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Kathryn K. Ahlrich

Kathryn K. Ahlrich

