

NO. 2013-05455

CARL HENRY BRUNSTING,	§	IN THE DISTRICT COURT OF
INDEPENDENT EXECUTOR OF THE	§	
ESTATES OF ELMER H. BRUNSTING	§	
AND NELVA E. BRUNSTING	§	
vs.	§	HARRIS COUNTY, T E X A S
CANDACE L. KUNZ-FREED AND	§	
VACEK & FREED, PLLC f/k/a	§	
THE VACEK LAW FIRM, PLLC	§	164th JUDICIAL DISTRICT

JOINT MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiff, Carl Henry Brunsting, Independent Executor of the estates of Elmer H. Brunsting and Nelva E. Brunsting (“Plaintiff”), and Defendants, Candace L. Kunz-Freed (“Freed”) and Vacek & Freed, PLLC f/k/a The Vacek Law Firm, PLLC (the “Law Firm”) (collectively “Defendants”), and file their Joint Motion for Continuance:

1. This matter is not ready for trial for a number of reasons. Discovery is still continuing in the case, and some discovery disputes are scheduled to be addressed by this Court on May 16, 2014.

2. By this agreed motion, the parties ask the court for a continuance in this case until February 2, 2015. The parties have submitted a proposed amended Docket Control Order with this motion.

This request for continuance is not for delay only, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the parties ask the Court to continue this case until February 2, 2015, and for such other and further relief to which they may show themselves entitled.

Respectfully submitted,

BAYLESS & STOKES

By: /s/ Bobbie G. Bayless

Bobbie G. Bayless
State Bar No. 01940600
2931 Ferndale
Houston, Texas 77098
Telephone: (713) 522-2224
Telecopier: (713) 522-2218
bayless@baylessstokes.com

Attorneys for Plaintiff

THOMPSON, COE, COUSINS, & IRONS,
L.L.P.

By: 

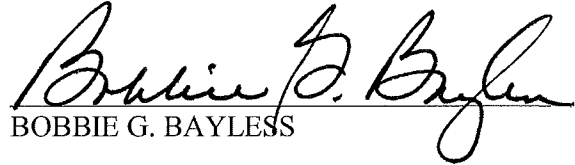
Zandra E. Foley
State Bar No. 24032085
Cory S. Reed
State Bar No. 24076640
One Riverway, Suite 1600
Houston, Texas 77056
Telephone: (713) 403-8200
Telecopier: (713) 403-8299
zfoley@thompsoncoe.com
creed@thompsoncoe.com

Attorneys Defendants, Candace L. Kunz-Freed and Vacek & Freed, PLLC f/k/a The Vacek Law Firm, PLLC

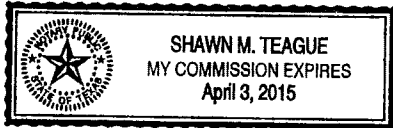
VERIFICATION

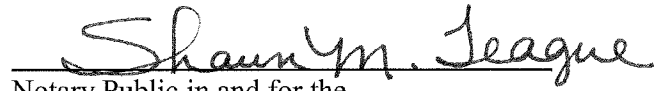
STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned Notary Public, on this day personally appeared BOBBIE G. BAYLESS, who, being by me duly sworn on oath deposed and said that she is competent to make this verification; that she has read the above Joint Motion for Continuance and that every statement contained in that document is within her knowledge and is true and correct.


BOBBIE G. BAYLESS

SUBSCRIBED AND SWORN TO BEFORE ME on the 28th day of April, 2014, to certify which witness my hand and official seal.




Notary Public in and for the
State of T E X A S
Printed Name: Shawn M. Teague
My Commission Expires: April 3, 2015