

CAUSE NO. D-1-GN-14-005114

JAMES STEELE, et al.,
Plaintiffs,

vs.

GTECH CORPORATION.
Defendant.

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

201ST JUDICIAL DISTRICT

OPPOSED VERIFIED MOTION FOR CONTINUANCE

In accordance with TEXAS RULES OF CIVIL PROCEDURE 247 and 251, Defendant GTECH Corporation (“GTECH”) files this Motion for Continuance (the “Motion”), and shows the Court as follows:

A Petition for Writ of Mandamus was filed on April 6, 2023 in the Third Court of Appeal (“3rd COA”) under Case No. 03-23-00205-CV (“Petition”). The Petition affects potential trial evidentiary issues in this matter.

GTECH seeks a continuance of trial until after the 3rd COA has ruled on the Petition. GTECH requests this relief in good faith, in the interest of justice, and to permit the efficient resolution of this dispute. This Motion is not made for purposes of delay, but so that justice may be done. Further, this Motion will not prejudice any party to this action.

WHEREFORE, Defendant GTECH Corporation respectfully requests this Court enter an order removing this matter from the Court’s April 24, 2023 trial docket, resetting this matter on the trial docket for the two-week period beginning _____, and for such other and further relief to which it may be entitled.

Respectfully submitted,

REED SMITH LLP

/s/ Kenneth E. Broughton

Kenneth E. Broughton

State Bar No. 03087250

Elizabeth C. Brandon

State Bar No. 24049580

Michael H. Bernick

State Bar No. 24078227

Arturo Muñoz

State Bar No. 24088103

811 Main Street, Suite 1700

Houston, Texas 77002-6110

Telephone: 713.469.3819

Telecopier: 713.469.3899

kbroughton@reedsmith.com

ebrandon@reedsmith.com

mbernick@reedsmith.com

amunoz@reedsmith.com

ATTORNEYS FOR DEFENDANT
GTECH CORPORATION

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served by electronic transmission via the Court's ECF system and/or email on April 14, 2023, on the following counsel of record and *pro se* Plaintiffs:

Richard L. LaGarde
Mary Ellis LaGarde
LAGARDE LAW FIRM, P.C.
9800 Northwest Frwy., Suite 314
Houston, Texas 77092
richard@lagardelaw.com
mary@lagardelaw.com

Manfred Sternberg
MANFRED STERNBERG &
ASSOCIATES, P.C.
1700 Post Oak Blvd., Suite 600
Houston, Texas 77056
manfred@msternberg.com

W. Mark Lanier
Kevin P. Parker
Christopher L. Gadoury
Ryan D. Ellis
Natalie Armour
THE LANIER LAW FIRM, P.C.
10940 W. Sam Houston Pkwy N., Ste 100
Houston, Texas 77064
WML@lanierlawfirm.com
Kevin.Parker@lanierlawfirm.com
Chris.Gadoury@lanierlawfirm.com
Ryan.Ellis@lanierlawfirm.com
Natalie.Armour@lanierlawfirm.com

Leroy B. Scott, Ph.D.
SCOTT LAW, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
lscott@scottesq.com

John T. McDowell
Clinton E. Wells, Jr.
MCDOWELL LAW GROUP LLP
603 Avondale
Houston, Texas 77006
jtm@houstontrialattorneys.com
cew@houstontrialattorneys.com

Bruce A. Smith
WARD, SMITH & HILL, PLLC
P.O. Box 1231
Longview, Texas 75606-1231
bsmith@wsfirm.com

James D. Hurst
JAMES D. HURST, P.C.
1202 Sam Houston Avenue #9
Huntsville, Texas 77340-4638
jdhurst@sbcglobal.net

Daniel H. Byrne
FRITZ BYRNE PLLC
221 West 6th Street, Suite 960
Austin, Texas 78701
dbyrne@fritzbyrne.law

Lessie C. Gilstrap
GILSTRAP LAW GROUP PC
1801 E. 51st Street, Suite 365-295
Austin, Texas 78723
lessie@gilstraplawgroup.com

Leonard E. Cox
ATTORNEY AT LAW
26932 Carriage Manor Lane
Kingwood, Texas 77339
LawyerCox@LawyerCox.com

Wes Dauphinot
Xintong "Olivia" Song
DAUPHINOT LAW FIRM
900 West Abram Street
Arlington, Texas 76013
wes@dauphinotlawfirm.com
olivia@dauphinotlawfirm.com

William M. Pratt
LAW OFFICE OF WILLIAM PRATT
6620 Camp Bowie Blvd., Suite B
Fort Worth, Texas 76116
lawofficeoffice@yahoo.com

Jerry B. Register
JERRY B. REGISTER, P.C.
1202 Sam Houston Avenue #5
P.O. Box 1402
Huntsville, Texas 77342
jbreg@sbcglobal.net
registerjb@outlook.com

William S. Webb
KRAFT & ASSOCIATES, P.C.
2777 N Stemmons Freeway, Ste 1300
Dallas, Texas 75207
swebb@kraftlaw.com

John H. Read, II
LAW OFFICES OF JOHN H. READ, II
1140 Empire Central Dr., Suite 340
Dallas, Texas 75247-4390
john@readlawoffices.com
r.fitz1@verizon.net

Paul T. Morin
PAUL T. MORIN, P.C.
911 Ranch Road 620N, Suite 204
Lakeway, Texas 78734
PMorin@austin.rr.com

Christopher S. Hamilton
Ray T. Khirallah, Jr.
Grant P. Boston
HAMILTON WINGO, LLP
325 N. St. Paul Street, Suite 3300
Dallas, Texas 75201
chamilton@hamiltonwingo.com
rkhirallah@hamiltonwingo.com
gboston@hamiltonwingo.com

Eugene W. Brees
WHITEHURST, HARKNESS, BREES, CHENG,
ALSAFFAR, HIGGINBOTHAM & JACOB, PLLC
1114 Lost Creek Blvd., Suite 410
Austin, Texas 78746
cbrees@nationaltriallaw.com

Richard Warren Mithoff
Warner V. Hocker
MITHOFF LAW
Penthouse, One Allen Center
500 Dallas, Suite 3450
Houston, Texas 77002
rmithoff@mithofflaw.com
whocker@mithofflaw.com

Blake C. Erskine
ERSKINE & MCMAHON, L.L.P.
P.O. Box 3485
Longview, Texas 75606
blakee@erskine-mcmahon.com

Henderson L. Buford, III
ATTORNEY AT LAW
4131 Spicewood Springs Rd., Unit G-2
Austin, Texas 78759
hlb@bufordlaw.com

Raymond L. Thomas
Olegario Garcia
RAY THOMAS, PC
4900-B N. 10th Street
McAllen, Texas 78504
rthomas@raythomaspc.com
ogarcia@raythomaspc.com

Justino "J.R." Garza
LAW OFFICE OF JUSTINO "J.R." GARZA, P.C.
2223 Primrose
McAllen, Texas 78504
jrgarza@rocketmail.com

David K. Sergi
DAVID K. SERGI & ASSOCIATES, P.C.
329 S. Guadalupe St.
San Marcos, Texas 78666
david@sergilaw.com

Dong Sheng Huang, *pro se*
8401 Rustling Leaves Dr., Apt. 202
Houston, Texas 77083
lockerp@yahoo.com

Pro Se Plaintiff Larry Washington
3110 Pecan Drive, Apt. 201
Memphis, TN 38115

4033 Ponca St.
Memphis, TN 38109

3905 Spumante
Memphis, TN 38115
Larrywashington737@gmail.com

Pro Se Plaintiff Joia Jefferson
1109 Luckenbach
Forney, TX 75126
joiajefferson@yahoo.com

Pro Se Plaintiff Dennis March
P.O. Box 120169
Tyler, TX 75712

2327 Breckenridge St.
Tyler, TX 75702

Pro Se Plaintiffs Juan Mendoza, Jr.
Pro Se Plaintiff Virginia Mendoza
525 West 15th Street
Del Rio, TX 78840
Jcisco525@gmail.com

/s/ Kenneth E. Broughton
Kenneth E. Broughton