

No. 23-0694

---

**In the Supreme Court of Texas**

—————  
BRENT EDWARD WEBSTER,  
*Petitioner,*

v.

COMMISSION FOR LAWYER DISCIPLINE,  
*Respondent.*

—————  
*On Petition for Review from the  
Eighth Court of Appeals, El Paso  
Case No. 08-22-00217-CV*

—————  
**BRIEF FOR *AMICI CURIAE*  
STATE OF MONTANA AND 17 OTHER STATES**

Christian Brian Corrigan\*  
*Solicitor General*  
OFFICE OF THE MONTANA  
ATTORNEY GENERAL  
215 North Sanders  
Helena, MT 59601  
Christian.corrigan@mt.gov

COUNSEL FOR *AMICI CURIAE*  
STATE OF MONTANA AND 17  
OTHER STATES

Randall W. Miller  
Texas Bar No: 24092838  
Emily C. Means  
Texas Bar No: 24137036  
MUNSCH HARDT KOPF & HARR, P.C.  
500 N. Akard Street, Suite 4000  
Dallas, TX 75201  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584  
rwmiller@munsch.com  
emeans@munsch.com

*\*Pro hac vice*

## IDENTITY OF PARTIES, AMICI CURIAE, AND COUNSEL

The parties have correctly identified themselves and their counsel.

### **Amici Curiae:**

State of Montana, by and through Attorney General Austin Knudsen

State of Alabama, by and through Attorney General Steve Marshall

State of Alaska, by and through Attorney General Treg Taylor

State of Florida, by and through Attorney General Ashley Moody

State of Idaho, by and through Attorney General Raúl Labrador

State of Indiana, by and through Attorney General Theodore E. Rokita

State of Iowa, by and through Attorney General Brenna Bird

State of Kansas, by and through Attorney General Kris Kobach

State of Louisiana, by and through Attorney General Liz Murrill

State of Mississippi, by and through Attorney General Lynn Fitch

State of Missouri, by and through Attorney General Andrew Bailey

State of Nebraska, by and through Attorney General Michael T. Hilgers

State of North Dakota, by and through Attorney General Drew Wrigley

State of Oklahoma, by and through Attorney General Gentner  
Drummond

State of South Carolina, by and through Attorney General Alan Wilson

State of South Dakota, by and through Attorney General Marty J.  
Jackley

State of Utah, by and through Attorney General Sean D. Reyes

State of West Virginia, by and through Attorney General Patrick  
Morrisey

**Appellate Counsel for Amici Curiae:**

Christian Brian Corrigan\*  
*Solicitor General*  
OFFICE OF THE MONTANA ATTORNEY GENERAL  
215 North Sanders  
Helena, MT 59601  
Christian.corrigan@mt.gov

*\*Pro hac vice*

Randall W. Miller  
Texas Bar No: 24092838  
Emily C. Means  
Texas Bar No: 24137036  
MUNSCH HARDT KOPF & HARR, P.C.  
500 N. Akard Street, Suite 4000  
Dallas, TX 75201  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584  
rwmiller@munsch.com  
emeans@munsch.com

## TABLE OF CONTENTS

Index of Authorities.....	v
Statement of Interest of Amici Curiae.....	vii
Argument.....	3
I. Attorneys General are subject to rules governing the practice of law, but those rules cannot interfere with an Attorney General’s exercise of constitutionally conferred discretionary authority .....	3
II. If this case is permitted to proceed, it will open the floodgates to more like it and will undermine State Attorneys General in the discharge of their constitutional duties.....	111
A. The need to respond to disciplinary complaints of this sort unduly interferes with the ability of State Attorneys General to do their jobs .....	111
B. Political adversaries who cannot succeed at the ballot box will increasingly turn to bar discipline as an alternative method of political control over their elected Attorneys General .....	13
Prayer .....	15
Additional Counsel.....	17
Certificate of Compliance.....	18

## TABLE OF AUTHORITIES

### Cases

<i>Am. K-9 Detection Servs., LLC v. Freeman</i> , 556 S.W.3d 246 (Tex. 2018) .....	5
<i>Armadillo Bail Bonds v. State</i> , 802 S.W.2d 237 (Tex. Crim. App. 1990) .....	6–7
<i>Chilcutt v. United States</i> , 4 F.3d 1313 (5th Cir. 1993).....	8
<i>Collins v. Yellen</i> , 141 S. Ct. 1761 (2021).....	6–7
<i>Enriquez v. Estelle</i> , 837 F. Supp. 830 (S.D. Tex. 1993) .....	8–9
<i>Harlow v. Fitzgerald</i> , 457 U.S. 800 (1982).....	11
<i>Hoffman v. Madigan</i> , 80 N.E.3d 105 (Ill. App. 2017) .....	5
<i>Marbury v. Madison</i> , 5 U.S. 137 (1803).....	5, 14–15
<i>Massameno v. Statewide Grievance Comm.</i> , 234 Conn. 539 (1995) .....	9, 10
<i>Matter of Austin Knudsen</i> , No. PR 23-0496 (Mont. Comm'n on Practice).....	14
<i>Ramsey v. Bd. of Pro. Resp. of Sup. Ct. of Tenn.</i> , 771 S.W.2d 116 (Tenn. 1989).....	8
<i>State v. Lead Indus., Ass’n</i> , 951 A.2d 428 (R.I. 2008) .....	5

<i>Trump v. Anderson</i> , 601 U.S. 100 (2024).....	13
<i>United States v. Shaffer Equip. Co.</i> , 158 F.R.D. 80 (S.D.W.Va. 1994) .....	8
<i>United States v. Tex.</i> , 599 U.S. 670 (2023).....	4–5
<i>W. Tradition P’ship., Inc. v. Attorney General</i> , 291 P.3d 545 (Mont. 2012).....	5
<b>Texas Constitution</b>	
TEX. CONST. art. XV .....	7
<b>Statutes</b>	
TEX. GOV’T CODE § 402 <i>et seq.</i> .....	11
TEX. GOV’T CODE § 81.011 .....	3
TEX. GOV’T CODE § 81.071 .....	3
<b>Texas Disciplinary Rules of Professional Conduct</b>	
Tex. Disciplinary Rules Prof’l Conduct R. 8.04(a)(2) .....	4
<b>Other Authorities</b>	
Order of the Supreme Court of Texas, <i>In the Matter of Daniel C. Morales</i> , Misc. Dkt. No. 03-9205 (Dec. 15, 2003).....	4

## STATEMENT OF INTEREST OF AMICI CURIAE

The States of Montana, Alabama, Alaska, Florida, Idaho, Indiana, Iowa, Kansas, Louisiana, Mississippi, Missouri, Nebraska, North Dakota, Oklahoma, South Carolina, South Dakota, Utah, and West Virginia appear through their elected and appointed Attorneys General. They have an interest in ensuring that State Attorneys General are permitted to exercise the discretionary authority conferred on them by their State Constitutions without improper interference or distractions.

**TO THE HONORABLE SUPREME COURT OF TEXAS:**

In the 43 States that have independently elected Attorneys General, several things are true. *First*, the independently elected Attorney General has broad discretion in the exercise of his or her constitutional duties. *Second*, the Attorney General is accountable to the people: There is one way to divest him of the discretion the State Constitution confers on him, and that is to remove him from office. *Third*, any attempt by the judiciary—or by entities subject to the judiciary’s control—to restrict the Attorney General’s discretionary choices interferes with the exercise of the Attorney General’s constitutional authority and violates fundamental separation-of-powers principles.

Yet around the country, political adversaries seek to limit the discretionary choices elected Attorneys General are allowed to make. The means they’ve selected to do so are novel: Invoking rules of professional conduct, they complain to the State Bar that certain discretionary choices are unacceptable and deserving of discipline. In other words, political adversaries eschew the ballot box and ask state judiciaries or state bars to be final arbiters of discretionary constitutional choices by Attorneys General.



Neither the State Bar nor this Court is an appropriate forum for what is ultimately a political fight. And while it is, of course, true that the Attorney General is subject to general rules of professional conduct, those rules cannot be used to limit discretionary authority conferred by a State Constitution. Nor can they be weaponized to undermine the will of the voters who elected the Attorney General in the first place.

## ARGUMENT

- I. **Attorneys General are subject to rules governing the practice of law, but those rules cannot interfere with an Attorney General’s exercise of constitutionally conferred discretionary authority.**

As lawyers licensed by their respective state bars, State Attorneys General are, of course, subject to the rules of professional conduct. But Attorneys General are unlike other members of the bar in two important respects. First, the Attorney General’s law practice involves wielding the executive power the State Constitution confers on him. Second, the Attorney General represents the public that elected him, and if the voters do not approve of the way he wields that power, they can divest him of it.

Because of these unique features of the Attorney General’s law practice, separation-of-powers principles insulate certain of his actions from review by the state bar’s disciplinary body—which, after all, is a creature of the judiciary. *See* TEX. GOV’T CODE § 81.011 (“The state bar is ... an administrative agency of the judicial department of government.”); *see also id.* § 81.071 (Texas attorneys are “subject to the disciplinary ... jurisdiction of the supreme court and the Commission for Lawyer Discipline, a committee of the state bar”). In reviewing a bar complaint

against an Attorney General, courts must first ask whether the conduct complained of can be subject to discipline in the first place.

Actions unrelated to the Attorney General’s constitutional authority or duties may well warrant discipline. Consider, for example, Rule 8.04(a)(2) of the Texas Disciplinary Rules of Professional Conduct, which provides that a lawyer shall not “commit a serious crime[.]” The Texas Constitution grants the Attorney General no authority to commit crimes—let alone serious ones—so subjecting him to discipline for such actions creates no separation-of-powers problem. Indeed, a former Texas Attorney General resigned in lieu of receiving discipline under that very rule. *See* Order of the Supreme Court of Texas, *In the Matter of Daniel C. Morales*, Misc. Dkt. No. 03-9205 (Dec. 15, 2003); *see also* Respondent Commission for Lawyer Discipline’s Br. (Respondent’s Br.) at 59 n.17 (discussing same).

But, to the extent an Attorney General is exercising discretion in the discharge of his constitutional duties, separation-of-powers principles prohibit the judicial branch from interfering with that exercise of executive power. Courts have long recognized, and the United States Supreme Court has recently reaffirmed, that judicial intrusion on

executive discretion violates the separation of powers. *See United States v. Tex.*, 599 U.S. 670, 678–79 (2023) (citing numerous cases involving “problems raised by judicial review” over executive “discretion” in various contexts). This Court, too, has made clear that “[t]he province of the court” is “to decide on the rights of individuals, not to inquire how the executive, or executive officers, perform duties in which they have a discretion.” *Am. K-9 Detection Servs., LLC v. Freeman*, 556 S.W.3d 246, 252 (Tex. 2018) (quoting *Marbury v. Madison*, 5 U.S. 137, 170 (1803)).

Many of the Attorney General’s actions involve the exercise of discretion because, both in Texas and in many other states, the State Constitution confers broad discretion on this executive office. *See* Petitioner Brent Edward Webster’s Br. (Webster’s Br.) at 23–25.<sup>1</sup> Thus, the question for a court reviewing a disciplinary complaint against an

---

<sup>1</sup> *See also, e.g., W. Tradition P’ship., Inc. v. Attorney General*, 291 P.3d 545, 550 (Mont. 2012) (“[I]f a challenge is brought to a state statute, the Attorney General has discretion to decide whether or not to defend its constitutionality.”); *Hoffman v. Madigan*, 80 N.E.3d 105, 113 (Ill. App. 2017) (“[T]he Attorney General has broad discretion to conduct litigation on behalf of the State, including evaluating the evidence and other pertinent factors to determine what action, if any, can and should properly be taken.” (cleaned up)); *State v. Lead Indus., Ass’n*, 951 A.2d 428, 473 (R.I. 2008) (“[T]he Attorney General in Rhode Island has broad powers and responsibilities ... In the course of exercising those powers, the Attorney General is vested with broad discretion.” (cleaned up)).

Attorney General is whether the conduct complained of involved the exercise of constitutionally conferred discretionary authority. If the answer is yes, the court should proceed no further.<sup>2</sup>

And here, the conduct identified in the complaints against both the First Assistant and the Attorney General himself falls well within this category. As Webster explains, the “misrepresentations” with which the Commission is concerned are part and parcel of “the Attorney General’s assessment of the facts, evidence, and law at the time he initiated *Pennsylvania*,” and “those judgments lie in the heartland of the Attorney General’s” broad discretionary authority. Webster’s Br. at 26.

To the extent there is any doubt about that conclusion, the Court should err on the side of caution rather than risk intruding on the executive’s authority and violating the separation of powers. As the inclusion of the separation-of-powers provision in the Texas Constitution makes clear, the intrusion of one branch on the authority of another is “one of the greatest threats to liberty,” and maintaining separation between the three branches is essential to protect individual freedom.

---

<sup>2</sup> To be clear, discipline by a tribunal for conduct in a specific proceeding before that tribunal isn’t inherently objectionable. But that’s a far cry from the facts in this case.

*Armadillo Bail Bonds v. State*, 802 S.W.2d 237, 239 (Tex. Crim. App. 1990); *see also Collins v. Yellen*, 141 S. Ct. 1761, 1796 (2021) (Gorsuch, J., concurring in part) (“Protecting this aspect of the separation of powers isn’t just about protecting [executive] authority. Ultimately, the separation of powers is designed to secure the freedom of the individual.” (cleaned up)).

Permitting the judicial branch to sanction the Attorney General or his subordinates also offends the broader structure of the Texas Constitution. Like many of its counterparts, it already provides a structural method for removing the Attorney General from office outside of elections. Article 15 vests that power solely with the Texas Legislature—a politically accountable branch. *See* TEX. CONST. art XV. In other words, the Commission’s actions unilaterally expropriate the power of the people and their elected representatives in two branches of government.

What’s more, safeguarding the Attorney General’s discretion here is, in fact, consistent with the cases cited by the Commission, none of which involved an Attorney General exercising constitutionally conferred discretionary authority. *See* Respondent’s Br. at 58 & n.16. For the most

part, the Commission’s cited authorities involve government attorneys abusing the discovery process or flouting court orders without any plausible legal justification for their actions. *See Chilcutt v. United States*, 4 F.3d 1313, 1315 (5th Cir. 1993) (government attorney “disobeyed the district court’s order to fulfill its discovery obligations and attempted to deceive the court and the plaintiffs into believing that certain documents properly requested either did not exist or were not requested”); *United States v. Shaffer Equip. Co.*, 158 F.R.D. 80, 86–87 (S.D.W.Va. 1994) (government attorneys “breached their duty of candor” and “flagrantly abused the discovery process” in CERCLA case by “repeatedly obstructing Defendants’ attempts to uncover [EPA Coordinator’s] perjury and failing to reveal what they knew of [his] misrepresentation once they learned of it”); *Ramsey v. Bd. of Pro. Resp. of Sup. Ct. of Tenn.*, 771 S.W.2d 116, 122–23 (Tenn. 1989) (government attorney “refused to prosecute [a] case” after a judge “indicated that he would not allow the State to dismiss the action,” “refused to answer” direct questions from the court, “slam[med] courtroom doors during hearings,” and was held in contempt, fined, and ordered to serve jail time); *Enriquez v. Estelle*, 837 F. Supp. 830, 832 (S.D. Tex. 1993)

(Hughes, J., imposing sanctions on Texas Attorney General and members of his office for “attacking the court for bias” and “disobey[ing] court orders” requiring “the attorney general to appear personally”). Such conduct is far afield from the conduct complained of here. The most obvious difference is that no court has taken any action against Webster or the Attorney General. Instead, the Commission acted because third parties unconnected to the *Texas v. Pennsylvania* proceedings weaponized the attorney discipline process against their political opponents.

And the Commission’s most factually analogous case, *Massameno*, ultimately supports the Attorney General. *Massameno* involved a grievance against a Connecticut state’s attorney for improper conduct related to a criminal prosecution. The state’s attorney argued that he could not be disciplined because “any and all grievance proceedings pertaining to prosecutors” are “a violation of the separation of powers.” *Massameno v. Statewide Grievance Comm.*, 234 Conn. 539, 576 (1995). The Connecticut Supreme Court declined to adopt that broad position. But in so doing, the Court recognized that prosecutorial functions involving “exercises of judgment and discretion”—such as weighing “the



strength of the evidence”—are “not generally well suited for broad judicial oversight.” *Id.* at 575. Thus, in a grievance proceeding involving such exercises of discretion, the Court said that “a prosecutor subject to investigation may be able to allege that, because of separation of powers principles, different substantive or procedural rules apply to him or her than to the average attorney.” *Id.* at 575–76.<sup>3</sup> That modest rule is the very same position *amici* advance here.

In sum, because an Attorney General cannot be subject to discipline for exercising discretion in the discharge of his constitutional duties, the case against Webster cannot proceed.

---

<sup>3</sup> The Connecticut Supreme Court also highlighted that—unlike the Texas Attorney General—the state’s attorneys in Connecticut are not purely executive officers. *Id.* at 555, 562 (explaining that “[t]he functions of a state’s attorney are not purely those of an executive officer” given the unique way that role had developed “since the days of the Connecticut colony”).

**II. If this case is permitted to proceed, it will open the floodgates to more like it and will undermine State Attorneys General in the discharge of their constitutional duties.**

**A. The need to respond to disciplinary complaints of this sort unduly interferes with the ability of State Attorneys General to do their jobs.**

The job of a State Attorney General is not an easy one. The Texas Attorney General oversees an office with 40 divisions, 700 attorneys, and thousands of additional staff. *See Webster's Br.* at 4 (citing TEX. GOV'T CODE § 402 *et seq.*). At any given time, his docket includes tens of thousands of cases. *See id.* (explaining that the Attorney General's civil litigation docket has "a caseload that numbers over 30,000 at any given time," and noting this number "does not include the office's many criminal and child-support cases"). The responsibilities of Attorneys General in other States are similar.

Add to that the need to respond to improper disciplinary complaints, and it's easy to see how an Attorney General's office will struggle. These disciplinary proceedings take time and distract the Attorney General from the public's business. *Cf. Harlow v. Fitzgerald*, 457 U.S. 800, 817 (1982) (expressing concern about the sort of inquiries that "can be peculiarly disruptive of effective government"). And with his

personal law license on the line, it is difficult for the Attorney General to delegate the matter to another attorney. Indeed, the Commission makes a point to emphasize the personal nature of the complaints. *See* Respondent’s Br. at 56 (“[H]ere, what is at stake is the regulation of Webster’s license to practice law in the State of Texas, which is personal to him and **is not dependent on or subject to any position he may hold as a public employee.**”) (emphasis in original).

To be sure, *any* disciplinary complaint against the Attorney General will interfere with his ability to get his job done. But *legitimate* complaints—those that don’t implicate the Attorney General’s executive discretion—are harder to make out. Without this limitation, political adversaries will have nearly endless opportunities to try to haul the Attorney General before the disciplinary commission: It isn’t hard to find fundamental political disagreements about basic facts, evidence, and law at the heart of nearly every controversial case. As a result, accusations that political figures peddle “misinformation” are so common that they have become entirely unremarkable. But simply replace “misinformation” with “misrepresentation,” and you’ve got an alleged violation of the rules of professional conduct. *See, e.g.*, Respondent’s Br.

at 23–24 (“[T]he Petition sets forth specific representations Webster made in the *Texas v. Penn* pleadings, which the Commission alleges were dishonest and/or were misrepresentations, within the meaning of TDROC 8.04(a)(3).”). Disrupting the proper functioning of the Attorney General’s Office cannot be made so easy.

**B. Political adversaries who cannot succeed at the ballot box will increasingly turn to bar discipline as an alternative method of political control over their elected Attorneys General.**

The real question in this case is not whether the alleged misrepresentations amount to violations of the rules of professional conduct. Instead, it is whether courts will permit the politicization of the State Bars and weaponization of disciplinary rules against elected executive officers discharging their constitutional duties. The Supreme Court of Texas will likely be the first to consider that question. It should answer with a resounding “No.”

The context in which this complaint arose matters. Amidst the widespread political escalation of the last few years, the nation has seen many novel attempts to control political outcomes through illegitimate or antidemocratic means—from protests outside the homes of members of the United States Supreme Court to unanimously rejected efforts to

remove a major party's frontrunner from state ballots. *See Trump v. Anderson*, 601 U.S. 100 (2024).

This complaint exemplifies a new sort of lawfare cut from the same cloth as those antidemocratic efforts. The complainant here is not a Texas resident or practicing Texas attorney—she is a self-described “citizen concerned about fascism.” Webster’s Br. at 13. Similarly, in Montana, Attorney General Knudsen faces a disciplinary complaint for his representation of the State Legislature in a politically controversial dispute, likewise filed by an out-of-state attorney with no personal involvement in the matter. *See generally Matter of Austin Knudsen*, No. PR 23-0496 (Mont. Comm’n on Practice).

These “concerned citizens” seek to use rules of professional conduct to chasten elected Attorneys General for making the very choices their State’s voters elected them to make. But there is already a means for “concerned citizens” to exert political control over the office of the Attorney General—namely, elections. In this context, the State Bar’s disciplinary commission is not an appropriate substitute for nor a proper supplement to the people’s will.

Moreover, there is an appreciable risk that this type of political activism will incentivize bar complaints made for the sole purpose of obstructing the ability of attorneys general and their staff to carry out their constitutional responsibilities. The weaponization of the attorney grievance process impedes the work of the people and frustrates the constitutional structure. *Freeman*, 556 S.W.3d at 252 (quoting *Marbury* 5 U.S. at 170). Due to those concerns, the courts should extend maximum discretion to attorneys general and their staff in all but the most clear and extreme cases of misconduct.

### **PRAYER**

The Court should grant the petition, reverse the court of appeals' decision, and render judgment on behalf of the First Assistant.

Respectfully submitted,  
AUSTIN KNUDSEN  
Attorney General of Montana

/s/ Christian B. Corrigan  
Christian B. Corrigan\*  
*Solicitor General*  
OFFICE OF THE MONTANA ATTORNEY  
GENERAL  
215 North Sanders  
Helena, MT 59601  
christian.corrigan@mt.gov

*\*Pro hac vice*

Randall W. Miller  
Texas Bar No: 24092838  
Emily C. Means  
Texas Bar No: 24137036  
MUNSCH HARDT KOPF & HARR, P.C.  
500 N. Akard Street, Suite 4000  
Dallas, TX 75201  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584  
rwmiller@munsch.com  
emeans@munsch.com

**COUNSEL FOR *AMICI CURIAE***  
**STATE OF MONTANA AND 17 OTHER**  
**STATES**

ADDITIONAL COUNSEL

STEVE MARSHALL  
*Attorney General of  
Alabama*

ANDREW BAILEY  
*Attorney General of  
Missouri*

TREG TAYLOR  
*Attorney General of  
Alaska*

MICHAEL T. HILGERS  
*Attorney General of  
Nebraska*

ASHLEY MOODY  
*Attorney General of  
Florida*

DREW WRIGLEY  
*Attorney General of  
North Dakota*

RAÚL LABRADOR  
*Attorney General of  
Idaho*

GENTNER DRUMMOND  
*Attorney General of  
Oklahoma*

THEODORE E. ROKITA  
*Attorney General of  
Indiana*

ALAN WILSON  
*Attorney General of  
South Carolina*

BRENNA BIRD  
*Attorney General of  
Iowa*

MARTY J. JACKLEY  
*Attorney General of  
South Dakota*

KRIS KOBACH  
*Attorney General of  
Kansas*

SEAN D. REYES  
*Attorney General of  
Utah*

LIZ MURRILL  
*Attorney General of  
Louisiana*

PATRICK MORRISEY  
*Attorney General of  
West Virginia*

LYNN FITCH  
*Attorney General of  
Mississippi*



## CERTIFICATE OF COMPLIANCE

Microsoft Word reports that this document contains 2,810 words,  
excluding exempted text.

*/s/ Christian B. Corrigan*  
Christian B. Corrigan

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was forwarded to all counsel of record by electronic filing in accordance with the Texas Rules of Appellate Procedure on April 12, 2024.

Lanora C. Pettit  
State Bar No. 24115221  
Lanora.Pettit@oag.texas.gov  
William Cole  
State Bar No. 24124187  
William.Cole@oag.texas.gov  
**OFFICE OF THE ATTORNEY GENERAL**  
P.O. Box 12548 (MC 059)  
Austin, Texas 78711-2548

*Counsel for Petitioner*  
*Brent Edward Webster*

Michael G. Graham  
State Bar No. 24113581  
Michael.Graham@texasbar.com  
Royce Lemoine  
State Bar No. 24026421  
Royce.Lemoine@texasbar.com  
**STATE BAR OF TEXAS**  
P.O. Box 12487  
Austin, Texas 78711-2487

*Counsel for Respondent*  
*Commission for Lawyer Discipline*

*/s/ Christian B. Corrigan*  
\_\_\_\_\_  
Christian B. Corrigan

## 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:

Envelope ID: 86604581  
Filing Code Description: Amicus Brief  
Filing Description:  
Status as of 4/12/2024 1:34 PM CST

Associated Case Party: Office of the Texas Attorney General

Name	BarNumber	Email	TimestampSubmitted	Status
Lanora Pettit	24115221	lanora.pettit@oag.texas.gov	4/12/2024 1:18:24 PM	SENT
William Cole	24124187	William.Cole@oag.texas.gov	4/12/2024 1:18:24 PM	SENT

### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Royce Lemoine	24026421	royce.lemoine@texasbar.com	4/12/2024 1:18:24 PM	SENT
Seana Beckerman Willing	787056	seana.willing@texasbar.com	4/12/2024 1:18:24 PM	SENT
Maria Williamson		maria.williamson@oag.texas.gov	4/12/2024 1:18:24 PM	SENT
Michael Graham	24113581	Michael.Graham@TEXASBAR.COM	4/12/2024 1:18:24 PM	SENT
Randall Miller		RWMiller@munsch.com	4/12/2024 1:18:24 PM	SENT
Kelsey Kraner		KKraner@munsch.com	4/12/2024 1:18:24 PM	SENT
Toni Shah		toni.shah@oag.texas.gov	4/12/2024 1:18:24 PM	SENT
Mike Scarcella		mike.scarcella@tr.com	4/12/2024 1:18:24 PM	SENT
Christian Corrigan		Christian.Corrigan@mt.gov	4/12/2024 1:18:24 PM	SENT
Stephanie Glenn		sglenn@munsch.com	4/12/2024 1:18:24 PM	SENT