

**No. 05-24-00630-CV**

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**In the Court of Appeals  
For the Fifth District of Texas**

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**IN THE INTEREST OF C.H. AND M.H., CHILDREN**  
Appellant

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On Appeal from the 192nd District Court of Dallas County, Texas  
Trial Court Cause No. DC-24-00720-K

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**BRIEF OF APPELLEES JUDGE CHELSIE RAMOS, HARRIS COUNTY  
DISTRICT CLERKS AND HARRIS COUNTY APPEALS CLERKS, AND  
HARRIS COUNTY SHERIFF DIVISION**

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**NO ORAL ARGUMENT REQUESTED**

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<p><b><u>Appellees:</u></b></p> <p>Former Judge Chelsie Ramos</p> <p>Harris County District Clerks and Harris County Appeals Clerks</p> <p>Harris County Sheriff Division</p>	<p><b>Appeal Counsel</b>          Seth Hopkins          Special Assistant County Attorney          Harris County Attorney’s Office          1019 Congress Avenue, 15th Floor          Houston, Texas 77002</p> <p><b>Trial Counsel</b>          James Butt          Charles Shaw          Harris County Attorney’s Office          1019 Congress Avenue, 15th Floor          Houston, Texas 77002          James.Butt@harriscountytexas.gov          Charles.Shaw@harriscountytexas.gov</p>
<p><b><u>Appellees:</u></b></p> <p>Judge Sandra Peake</p> <p>Judge Lori Gray</p> <p>Former Judge Charley Prine</p> <p>Former Judge Clinton Wells, Jr.</p> <p>Former Judge James Lombardino</p>	<p>Kimberly Gdula          General Litigation Division Chief          Scot Graydon          Assistant Attorney General          Office of the Attorney General          P.O. Box 12548, Capitol Station          Austin, Texas 78711-2548</p>

<p><b><u>Appellee:</u></b></p> <p>Beneke Elementary School/Spring ISD</p>	<p>Christopher Gilbert  Kathryn Vestal  Thompson &amp; Horton LLP  3200 Southwest Freeway, Suite 2000  Houston, Texas 77027</p>
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## **RESPONSE TO STATEMENT REGARDING ORAL ARGUMENT**

Appellees Harris County (erroneously identified as the “Harris County District Clerks and Harris County Appeals Clerks” and “Harris County Sheriff Division”) and former Judge Chelsie Ramos do not request oral argument in this accelerated appeal because the dispositive issues have been authoritatively decided by case law, the facts and legal arguments are adequately presented in the briefs and record, and the decisional process would not be significantly aided by oral argument.



## RECORD AND PARTY REFERENCES AND CITATIONS

Appellees' brief uses the following references, with specific page numbers in brackets, unless otherwise noted.

### Record References

The Clerk's Record consists of three volumes with continuously numbered pages, referenced as follows:

Clerk's Record CR. [page]

The Reporter's Record consists of three volumes, with only the second and third volumes referenced as follows:

Reporter's Record for hearings on pleas to the jurisdiction and motions to dismiss held April 22, 2024 2RR. [page]

Reporter's Record for hearings in Dallas County on the motion to vacate the judgment of the Harris County district court held May 10, 2024 3RR. [page]

## STATEMENT OF THE CASE

*Nature of the Case:*

For seven years, Appellant Tammi Humphrey-Jones litigated her family law case in Harris County through appeal to the Texas Supreme Court. Six months after the Supreme Court denied review of the matter, she filed a new lawsuit in the 192nd District Court in Dallas County against various public officials and private attorneys. The Dallas suit sought damages, nullification of the Harris County judgment, and various remedies such as having her driver's license reinstated.

*Trial Court:*

The Honorable Maria Aceves,  
192nd District Court of Dallas County, Texas  
Trial Court Cause No. DC-24-00720

*Trial Court's Disposition:*

On April 22, 2024, the 192nd District Court dismissed the claims against an entity incorrectly identified as the "Harris County District Clerks and Harris County Appeals Clerks," an entity incorrectly identified as the "Harris County Sheriff Division," and former Judge Chelsie Ramos based on immunity. This was an interlocutory order.

On May 10, 2024, the 192nd District Court denied Appellant's motion to vacate the Harris County judgment. This was a final judgment dismissing the remaining parties and claims.

On May 21, 2024, Appellant filed a notice of appeal.

## STATEMENT OF JURISDICTION

Appellees Harris County (erroneously identified as the “Harris County District Clerks and Harris County Appeals Clerks” and “Harris County Sheriff Division”) and former Judge Chelsie Ramos contend that this Court does not have jurisdiction over the April 22, 2024 order dismissing former Judge Chelsie Ramos and the Harris County entities because that was an interlocutory order under Tex. Civ. Prac. & Rem. Code § 51.014(a)(8). Under Tex. R. App. P. 26.1(b) and Tex. R. App. P. 28.1(a), Appellant had 20 days to appeal that order, yet her notice of appeal was not filed until 29 days later on May 21, 2024.

On July 12, 2024, this Court found that it has jurisdiction over the May 10, 2024 final judgment in the 192nd District Court. That judgment correctly concluded that the 192nd District Court lacked jurisdiction to nullify a Harris County judgment—particularly as to matters that have already been litigated to the Supreme Court.

## **TO THE HONORABLE JUSTICES:**

Appellees Harris County (erroneously identified as the “Harris County District Clerks and Harris County Appeals Clerks” and “Harris County Sheriff Division”) and former Judge Chelsie Ramos (collectively, “Harris County Appellees”) respectfully represent:

### **STATEMENT OF FACTS**

On July 6, 2016, Appellant Tammi Humphrey-Jones began litigating her divorce in Cause No. 2016-37371, which was transferred between several Harris County district courts. In April 2023, the matter was tried, and Humphrey-Jones appealed that verdict to the First Court of Appeals and Texas Supreme Court. See *In the Interest of C.H. and M.H, Children*, No. 01-22-00777-CV, 2023 WL 2603397 (Tex. App.—Houston [1st Dist.] Mar. 23, 2023), *review denied* (June 30, 2023).

On January 10, 2024, Humphrey-Jones filed a new lawsuit in Dallas County contesting the Harris County judgment. CR.34-544. The Dallas County lawsuit makes allegations against a variety of public officials and private attorneys and seeks damages for intentional infliction of emotional distress based on alleged violations of various federal criminal statutes and constitutional provisions. CR.34-61. With respect to the Harris County Appellees, Humphrey-Jones alleged that some of the hearings that occurred in Harris County district courts were not

transcribed, some of the documents she filed were not in the district clerk's record, and that she had an altercation with a Harris County Sheriff's Office deputy.

On February 23, 2024, the "Harris County Sheriff Division" filed a Plea to the Jurisdiction and Motion to Dismiss asserting that this alleged entity does not exist and is not a juridical person subject to suit and that Harris County is entitled to governmental immunity. CR.641-646.

On February 28, 2024, the "Harris County District Clerks and Harris County Appeals Clerks" filed a Plea to the Jurisdiction and Motion to Dismiss asserting that this alleged entity does not exist and is not a juridical person subject to suit and that Harris County is entitled to governmental immunity. CR.649-653.

On March 19, 2024, former Associate District Judge Chelsie Ramos filed a Plea to the Jurisdiction alleging she is entitled to governmental and judicial immunity and that any claims Humphrey-Jones had regarding Judge Ramos' ruling could only be taken by direct appeal—not a separate civil lawsuit against the judge. Judge Ramos explained that Humphrey-Jones lacked standing to bring suit because there is no justiciable controversy, no redressability, and Humphrey-Jones is not entitled to bring a civil claim based on federal criminal statutes. CR.907-922.

On April 22, 2024, the Honorable Maria Aceves heard these three motions and similar motions filed by other defendants. The district court listened to

Appellant’s response to the State Judges’ plea to the jurisdiction (2RR.17-42), the Harris County Sheriff’s Office’s plea to the jurisdiction (2RR.42-44), Judge Ramo’s plea to the jurisdiction (2RR.44-45), and the Harris County District Clerk’s plea to the jurisdiction and motion to dismiss (2RR.45-50).

The Dallas court also permitted Humphrey-Jones to present evidence from George Clevenger—her court-appointed attorney during a 2022 enforcement action against her. Clevenger testified that he was able to get the enforcement action dismissed based on a defect in service. 2RR.80-84. Clevenger also gave his legal opinion (which was objected to) that incarcerated parents should be appointed counsel when their custody or parental rights are being terminated. 2RR.84-86.

The district court found that because this was a civil case, “it’s pretty rare for Courts to appoint counsel” and it would not appoint one to help Humphrey-Jones prosecute her private case—especially in a Dallas County court when venue is in Harris County. 2RR.87-88.

On April 22, 2024, the district court dismissed the claims against the entity erroneously described as the “Harris County Sheriff Division” (CR.2471), former Judge Chelsie Ramos (CR.2485), the entity erroneously described as “Harris County District Clerks and Appeal Clerks” (CR.2505), and other defendants. Humphrey-Jones filed a notice of appeal 29 days later on May 21, 2024. CR.2725.

On April 26, 2024, Humphrey-Jones filed a motion asking the Dallas County court to vacate her family law judgment in Harris County. CR.2565-2580. She alleged that her seven years of litigation in Harris County and her appeal should be nullified because she and her children moved to Dallas County around 2016, and the matter should always have been litigated in Dallas County. CR.2567-2568.

The motion to vacate the Harris County judgment was heard on May 10, 2024. At that hearing, defendants introduced the complete record of the family law proceedings in Harris County which showed that Humphrey-Jones attempted to transfer venue to Dallas County, but the Harris County courts found she was not entitled to do so. 3RR.12-18. On May 13, 2024, the district court denied the motion to vacate and dismissed the remainder of the case. CR.2718-2724.

On appeal, Humphrey-Jones seeks the following relief: (1) To overturn the 192nd District Court's ruling dismissing her civil suit, (2) to be compensated for intentional infliction of emotional distress, (3) to vacate case number 2016-37371 (in the 257th District Court of Harris County), (4) to have her driver's license reinstated,<sup>1</sup> and (5) to have a court-appointed attorney for her civil case. Appellant's Brief at 42.

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<sup>1</sup> Although the parties speculated during oral argument that Appellant's license may have been suspended in connection with the family law case, the details were never made clear to the Court, and no party to this suit has the authority to reinstate her license. RR.95-97.

## SUMMARY OF THE ARGUMENT

The “Harris County District Clerks and Harris County Appeals Clerks” and “Harris County Sheriff Division” and former Judge Chelsie Ramos were dismissed by interlocutory orders on April 22, 2024. Under Tex. Civ. Prac. & Rem. Code § 51.014(a)(8), Tex. R. App. P. 26.1(b), and Tex. R. App. P. 28.1(a), Humphrey-Jones had 20 days to appeal these orders but did not file her notice of appeal until 29 days later. Thus, any appeal of these dismissals is untimely.

Alternatively, the district court’s dismissals were proper. First, the alleged entities “Harris County District Clerk’s and Harris County Appeals Clerks” and “Harris County Sheriff Division” do not exist. Second, Appellant never showed a valid waiver of immunity or addressed the issue of immunity in the court below or on appeal. Third, any claims against public officials were properly dismissed based on official immunity. Fourth, to the extent Appellant makes claims against public officials such as deputy district clerks for performing judicial and quasi-judicial functions, those claims were properly dismissed based on judicial immunity. Fifth, all claims against former Judge Ramos in connection with her rulings were properly dismissed based on judicial immunity. Finally, Appellant has no standing to challenge Judge Ramos’ rulings or alleged violations of federal criminal law in the 192nd Judicial District.



## **ARGUMENT**

### **I.**

#### **APPELLANT DID NOT TIMELY APPEAL THE DISTRICT COURT'S APRIL 22, 2024 INTERLOCUTORY ORDERS DISMISSING DEFENDANTS**

On April 22, 2024, the 192nd District Court dismissed former Judge Chelsie Ramos, the entity erroneously identified as “Harris County District Clerk’s and Harris County Appeals Clerks,” and the entity incorrectly identified as the “Harris County Sheriff Division” based on immunity. These were interlocutory orders under Tex. Civ. Prac. & Rem. Code § 51.014(a)(8). Under Tex. R. App. P. 26.1(b) and Tex. R. App. P. 28.1(a), Humphrey-Jones had 20 days to appeal these orders, yet her appeal was not filed until May 21, 2024—nine days after her deadline expired. Because the orders dismissing the Harris County Appellees were not timely appealed, this Court lacks jurisdiction to consider arguments regarding the dismissal of these parties.

On June 17, 2024, the Texas Attorney General’s Office—representing five current and former judges (“State Judges”)—moved to dismiss the instant appeal for lack of jurisdiction on these grounds. On July 12, 2024, this Court found the May 13, 2024 order to be a final judgment that was timely appealed. The May 13, 2024 order made two findings: (1) That subject matter jurisdiction as to Cause No. 2016-37371 is proper in Harris County and (2) The 192nd Judicial District Court of

Dallas County has no subject-matter jurisdiction or legal authority to vacate the Harris County Judgment. CR.2690-2697.

This May 13, 2024 order has no bearing on the April 22, 2024 dismissal of the Harris County Appellees. Accordingly, the appeal against the Harris County Appellees should be dismissed.

**II.**  
**APPELLANT’S CLAIMS AGAINST THE HARRIS COUNTY APPELLEES  
WERE PROPERLY DISMISSED ON THE MERITS**

Assuming, *arguendo*, this Court reaches the merits of the case, the 192nd District Court still properly dismissed the case based on immunity. Sovereign immunity has two components: immunity from suit and immunity from liability. *City of Houston v. Williams*, 353 S.W.3d 128, 134 (Tex. 2011). The State retains immunity from suit unless the Legislature has expressly waived it for a particular claim. *Federal Sign v. Texas Southern University*, 951 S.W.2d 401, 405 (Tex. 1997) (superseded by statute on other grounds); *City of Galveston v. State*, 217 S.W.3d 466, 469 (Tex. 2007). Even when the Legislature gives consent to sue, public entities and their officials are still shielded from money judgments based on immunity from liability. Thus, a plaintiff must show that the Legislature has waived both immunity from suit and immunity from liability. *Id.*, 217 S.W.3d at 469.

In 2001, the Legislature codified Texas Gov’t Code § 311.034, which

requires “clear and unambiguous language” to waive immunity:

In order to preserve the legislature’s interest in managing state fiscal matters through the appropriations process, a statute shall not be construed as a waiver of sovereign immunity unless the waiver is effected by clear and unambiguous language . . . Statutory prerequisites to a suit, including the provision of notice, are jurisdictional requirements in all suits against a governmental entity.

Tex. Gov’t Code § 311.034; *Texas National Resources Conservation Com’n v. IT-Davy*, 74 S.W.3d 849, 854 (Tex. 2002). Since then, the Supreme Court has repeatedly reaffirmed the high burden a party asserting a waiver of immunity bears.

Immunity is a jurisdictional question, and a party may file a plea to the jurisdiction to dismiss a case for lack of subject matter jurisdiction. *McLane Champions, LLC v. Houston Baseball Partners LLC*, No. 21-0641, 2023 WL 4306378, at \*3 (Tex. June 30, 2023), citing *Buzbee v. Clear Channel Outdoor, LLC*, 616 S.W.3d 14, 22 (Tex. App.—Houston [14th Dist.] 2020, no pet.).

The question of whether a court has subject matter jurisdiction is a matter of law, and a trial court should determine whether it has jurisdiction at the earliest opportunity before moving on with litigation. *Texas Department of Parks & Wildlife v. Miranda*, 133 S.W.3d 217 at 226, 229 (Tex. 2004). A plaintiff has the burden of showing that the trial court has jurisdiction. *Miranda*, 133 S.W.3d at 225-26. If the pleadings negate the existence of jurisdiction, a plea to the jurisdiction may be

granted without allowing the plaintiff an opportunity to amend. *Miranda*, 133 S.W.3d at 227.

In this case, Humphrey-Jones has not shown that the Legislature waived immunity for any of her claims against the Harris County Appellees, and the claims against these entities were properly dismissed.

Similarly, public officials have immunity for their official acts. “Common law official immunity is based on the necessity of public officials to act in the public interest with confidence and without the hesitation that could arise from having their judgment continually questioned by extended litigation.” *Ballantyne v. Champion Builders, Inc.*, 144 S.W.3d 417, 424 (Tex. 2004) (citations omitted). “Official immunity protects public officials from suit arising from performance of their (1) discretionary duties (2) in good faith (3) within the scope of their authority.” *Id.* at 422 (citations omitted).

Texas courts have long held that judges enjoy absolute judicial immunity for judicial acts, no matter how erroneous the act, unless the act is performed in the clear absence of all jurisdiction. *City of Houston v. Swindall*, 960 S.W.2d 413, 417 (Tex. App.—Houston [1st Dist.] 1998, no pet.); *Turner v. Pruitt*, 161 Tex. 532, 342 S.W.2d 422, 423 (1961); *Delcourt v. Silverman*, 919 S.W.2d 777, 781 (Tex.App.—Houston [14th Dist.] 1996, writ denied); see also, Tex. Civ. Prac. & Rem. Code §

101.053(a), which retains immunity for claims based on acts related to the judicial function of a governmental unit—including “administrative decisions or actions.”

Judicial immunity not only protects judges—it protects others who assist with judicial functions. District clerks are judicial officers under Article V, § 9 of the Texas Constitution, and the interpretive commentary notes that the ordinary function of a district clerk is “to perform certain judicial or quasi judicial duties” for the court. Tex. Const. art. V, § 9, West Editors’ Notes Interpretative Commentary 2007 Main Volume. This concept of derived judicial immunity is well-established in Texas:

[w]hen judges delegate their authority or appoint others to perform services for the court, the judge’s judicial immunity may follow the delegation or appointment. This type of immunity is referred to as derived judicial immunity.

*City of Houston v. Swindall*, 960 S.W.2d 413, 417 (Tex. App.—Houston [1st Dist.] 1998, no pet.) (internal citations omitted), citing *Clements v. Barnes*, 834 S.W.2d 45-46.

Texas uses the federal “functional approach” to determine if a particular person enjoys derived judicial immunity. *Swindall*, 960 S.W.2d at 417. Anyone—regardless of title or job description—who engages in an activity intimately associated with the judicial process is entitled to judicial immunity for that act. *Id.* Thus, “[o]fficers of the court, such as court clerks, law clerks, bailiffs, constables

issuing writs, and court-appointed receivers and trustees have been accorded derived judicial immunity because they function as an arm of the court.” *Swindall*, 960 S.W.2d at 417. Even entering information into the court’s computer system “is an integral part of the functioning of the court” that entitles the clerk to judicial immunity. *Id.*

**A. The district court properly dismissed the Harris County Sheriff Division.**

On February 23, 2024, the Harris County Attorney’s Office filed a plea to the jurisdiction asserting that the “Harris County Sheriff Division” is not a juridical person subject to suit and that Harris County is entitled to governmental immunity. CR.641-646. To sue a public entity, that entity must enjoy a separate jural authority and legal existence. *Darby v. Pasadena Police Department*, 939 F.2d 311 (5th Cir. 1991).

Harris County has not taken any steps for either the “Harris County Sheriff Division” or Harris County Sheriff’s Office to have separate jural authority. *Driscoll v. Harris County Commissioners Court*, 688 S.W.2d 569 (Tex. Civ. App.—Houston [14th Dist.] 1984, writ ref’d. n.r.e.)(en banc). Therefore, neither of these *non-sui juris* entities are proper defendants.

In addition, Appellant did not meet her burden in the trial court of identifying a waiver of immunity and has not addressed immunity on appeal.

Finally, even if a waiver existed, Appellant did not state a cause of action against the Sheriff's Office. For these reasons, the district court properly dismissed the "Harris County Sheriff Division" and the grounds for that dismissal have not been appealed.

**B. The district court properly dismissed the Harris County District Clerks and Harris County Appeals Clerks.**

On February 28, 2024, the Harris County District Clerks and Harris County Appeals Clerks filed a Plea to the Jurisdiction and Motion to Dismiss asserting that these entities are not juridical persons subject to suit and that they (or Harris County) are entitled to governmental immunity. CR.649-653.

Just as Harris County has not taken any steps necessary for the Harris County Sheriff's Office to have separate jural authority, it has also not taken any steps necessary for the District Clerk's Office to have separate juridical authority. Therefore, even if the entity incorrectly identified as the "Harris County District Clerks and Harris County Appeals Clerks" had been properly identified, it would not have been a proper defendant.

In addition, Appellant did not meet her burden in the trial court of identifying a waiver of immunity and has not addressed the issue of immunity on appeal. Appellants' allegations against the District Clerk's Office and its employees

relate to their roles as arms of the court. Thus, these officials are not only entitled to official immunity, but also judicial immunity. *Swindall*, 960 S.W.2d at 417.

For these reasons, the district court properly dismissed the “Harris County District Clerks and Harris County Appeals Clerks” and the grounds for that dismissal have not been appealed.

**C. The district court properly dismissed former Judge Chelsie Ramos.**

On March 19, 2024, former Associate District Judge Chelsie Ramos filed a Plea to the Jurisdiction alleging she is entitled to governmental and judicial immunity and that any claims Humphrey-Jones had regarding Judge Ramos’ ruling could only be taken by direct appeal—not a separate civil lawsuit against the judge. CR.907-922.

As explained, judges are entitled to judicial immunity. The Legislature codified this as a carve-out to the Tort Claims Act in Tex. Civ. Prac. & Rem. Code § 101.053(a). That statute makes clear that judicial immunity applies to acts or omissions of a court of this state or any member of a court “acting in his official capacity or to a judicial function of a governmental unit.” Tex. Civ. Prac. & Rem. Code § 101.053(a); *Swindall*, 960 S.W.2d 413 (Tex. App.—Houston [1st Dist.] 1998, no pet.). Humphrey-Jones’ claims against former Judge Ramos relate to decisions made on the bench. Those decisions are protected by judicial immunity.



Further, the only court with jurisdiction to challenge former Judge Ramos' decisions is the court issuing the divorce and child custody decree. The Texas Family Code provides that only this court retains continuing exclusive jurisdiction over the case. Tex. Fam. Code § 155.002.

Humphrey-Jones has not identified any basis under which she could recover damages against former Judge Ramos based on rulings from the bench. Thus, she has no standing. Standing requires “that the plaintiff’s alleged injury be ‘fairly traceable’ to the defendant’s conduct because ‘a court [can] act only to redress injury that fairly can be traced to the challenged action of the defendant, and not injury that results from the independent action of some third party not before the court.’” *Meyers v. JDC/Firethorne, Ltd.*, 548 S.W.3d 477, 484-485 (Tex. 2018).

Humphrey-Jones’s reference to federal criminal statutes does not supply standing. Courts consistently hold that “violations of criminal statutes do not give rise to a private right of action.” *Doyon v. United States*, No. A-07-CA-977-SS, 2008 WL 2626837, \*4. Because former Judge Ramos’ rulings are subject to judicial immunity and because the 192nd District Court is not the proper venue to challenge these rulings, Humphrey-Jones has no justiciable controversy with Judge Ramos and no ability to have her alleged injury redressed.

## CONCLUSION AND PRAYER

This Court should dismiss this appeal against the “Harris County District Clerks and Harris County Appeals Clerks,” the “Harris County Sheriff Division, and former Judge Chelsie Ramos because Appellant filed this appeal more than 20 days after the April 22, 2024 interlocutory order dismissing these parties.

Alternatively, if the Court reaches the merits of this appeal, it should affirm the district court in all respects, tax costs in favor of Appellees, and grant all other relief to which Appellees are entitled.

Respectfully submitted,



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**CERTIFICATE OF COMPLIANCE**

The undersigned attorney certifies that this document was produced on a computer and printed in the Equity A typeface no smaller than 14-point, except for footnotes, which are no smaller than 12-point. This document also complies with the word-count limitations of Tex. R. App. P. 9.4. Relying on the word count of the computer program used to prepare this document, it contains 3,153 words, excluding the portions listed in Tex. R. App. P. 9.4(i)(1).

  
\_\_\_\_\_  
SETH HOPKINS

**CERTIFICATE OF SERVICE**

I certify that on the 1st day of November 2024 a true and correct copy of the foregoing instrument was served by the Court’s electronic filing system. For those parties being served by United States postal mail, a postage-paid copy of this instrument will be placed in the mail no later than Monday, November 4, 2024:

<p><b><u>Appellant:</u></b></p> <p>Tammi Humphrey-Jones 1360 FoxGlenn Cedar Hill, Texas 75104 Phone: (832) 816-7382</p>	<p><i>Pro Se</i></p>
<p><b><u>Appellees:</u></b></p> <p>Judge Sandra Peake</p> <p>Judge Lori Gray</p> <p>Former Judge Charley Prine</p> <p>Former Judge Clinton Wells, Jr.</p> <p>Former Judge James Lombardino</p>	<p>Kimberly Gdula General Litigation Division Chief</p> <p>Scot Graydon Assistant Attorney General</p> <p>Office of the Attorney General P.O. Box 12548, Capitol Station Austin, Texas 78711-2548</p>
<p><b><u>Appellee:</u></b></p> <p>Beneke Elementary School/Spring ISD</p>	<p>Christopher Gilbert Kathryn Vestal Thompson &amp; Horton LLP 3200 Southwest Freeway, Suite 2000 Houston, Texas 77027</p>

<p><b><u>Appellees:</u></b></p> <p>Leonel Farias II</p> <p>Adrian Santana</p>	<p><b>Appeal Counsel</b>  Katherine Elrich  Cobb Martinez Woodward PLLC  1700 Pacific Avenue, Suite 3100  Dallas, Texas 75201</p> <p><b>Trial Counsel</b>  Daniel Tostrud  Michael Smith  Cobb Martinez Woodward PLLC  1700 Pacific Avenue, Suite 3100  Dallas, Texas 75201</p>
<p><b><u>Appellees:</u></b></p> <p>Mae Pierre-Louis  Pierre-Louis &amp; Associates PLLC  3050 Kathy Freeway, Suite 213  Houston, Texas 77007</p> <p>Quannell Ralph Evans  5090 Richmond Street, Suite 146  Houston, Texas 77056</p> <p>Larry Humphrey  Carie Humphrey  20618 Viana Meadow Court  Cypress, Texas 77433</p>	<p><i>Pro se</i></p> <p><i>Pro se</i></p> <p><i>Pro se</i></p>

*Seth Hopkins*

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SETH HOPKINS

### Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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.

Seth Hopkins on behalf of Seth Hopkins

Bar No. 24032435

seth.hopkins@harriscountytexas.gov

Envelope ID: 93846008

Filing Code Description: Brief Not Requesting Oral Argument

Filing Description: Brief of Appellees former Judge Chelsie Ramos, Harris

County District Clerks and Harris County Appeals Clerks, and Harris

County Sheriff Division

Status as of 11/1/2024 3:15 PM CST

Associated Case Party: TammiJHumphrey

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Status as of 11/1/2024 3:15 PM CST

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