

NO. 141-370402-25**WEINSTEIN MANAGEMENT CO.,
INC. AND WMC DALLAS X, LLC,
Plaintiffs and Counter-Defendants,****v.****KATHRYN COPELAND,
Defendant and Counter-Plaintiff.**§
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§**IN THE DISTRICT COURT OF****TARRANT COUNTY, TEXAS****141ST JUDICIAL DISTRICT**

**VERIFIED MOTION TO DISQUALIFY PLAINTIFFS' COUNSEL
AS MATERIAL FACT WITNESSES**

TO THE HONORABLE JUDGE JOHN P. CHUPP:

Defendant and Counter-Plaintiff Kathryn Copeland respectfully moves this Court to disqualify Glynis L. Zavarelli and Michelle S. Sortor as counsel for Plaintiffs under Texas Disciplinary Rules of Professional Conduct Rule 3.08 and the Court's inherent authority.

This is not a standard motion. Most disqualification motions address conflicts of interest or prior representation. This motion addresses something more fundamental: counsel have affirmatively inserted themselves into the factual center of this case.

Ms. Zavarelli personally authorized the removal of Defendant's property on October 5, 2025, personally inspected Defendant's belongings (including family photographs and children's items), and personally decided to withhold a critical September 8, 2025 professional report from three court hearings. Ms. Sortor coordinated housing decisions with the insurance adjuster, threatened "legal remedies" after the property removal, and made representations to the Court about Defendant's compliance with hearing accommodations.

In this unique case, **the "actors" were the lawyers.** The decisions central to Defendant's claims—property removal, evidence concealment, housing coordination—were made by counsel,

not by their corporate clients. Counsel are therefore necessary witnesses to essential facts, and their continued representation violates Rule 3.08.

I. ADA ACCOMMODATION REQUESTED

Pursuant to 28 C.F.R. § 35.130(b)(7), Defendant requests that this Court decide this motion on **WRITTEN SUBMISSION**.

BASIS: Documented traumatic brain injury affecting oral communication (medical records attached to Defendant's Emergency Application for Preservation Order and Temporary Relief filed September 29, 2025).

II. LEGAL STANDARD

A. Texas Disciplinary Rules of Professional Conduct Rule 3.08

"A lawyer shall not act as an advocate in an adjudicatory proceeding in which the lawyer is likely to be a necessary witness on a contested issue of material fact..."

Tex. Disciplinary Rules Prof'l Conduct R. 3.08(a).

B. Supreme Court of Texas - Controlling Standard

In re Sanders, 153 S.W.3d 54, 57 (Tex. 2004):

"When a lawyer is or may be a witness necessary to establish an essential fact, Texas Disciplinary Rule of Professional Conduct 3.08 prohibits the lawyer from acting as both an advocate and a witness in an adjudicatory proceeding."

"The fact that a lawyer serves as both an advocate and a witness does not in itself compel disqualification. Disqualification is appropriate only if the lawyer's testimony is 'necessary to establish an essential fact.'"

C. Defendant's Burden

To establish grounds for disqualification under TDRPC 3.08, Defendant must prove:

1. Attorney's testimony is "necessary"
2. Testimony goes to "essential fact"
3. Moving party will suffer "actual prejudice"
4. Proven with "specificity"

In re Tips, 341 S.W.3d 30, 34 (Tex. App.—San Antonio 2010, orig. proceeding); *Jones-Hospod v. Hospod*, 676 S.W.3d 709, 722 (Tex. App.—El Paso 2023, no pet.).

Each element is proven by documentary evidence below.

III. NECESSARY WITNESS TO ESSENTIAL FACTS

Standard for "Necessary" Testimony

In re Tips, 341 S.W.3d at 34:

"Disqualification is appropriate only if the lawyer's testimony is 'necessary to establish an essential fact on behalf of the lawyer's client.'... Therefore, disqualification is inappropriate under Rule 3.08 when opposing counsel merely announces their intention to call the attorney as a fact witness without establishing both a genuine need for the attorney's testimony and that the testimony goes to an essential fact."

Defendant establishes both:

1. **Genuine need:** Counsel are ONLY witnesses to their own decisions
2. **Essential fact:** Their decisions are central to Defendant's claims

In this unique case, **the "actors" were the lawyers.** The corporate Plaintiffs did not personally inspect Defendant's property, authorize its removal, decide to withhold the September 8 report from court hearings, or coordinate housing termination with the insurer. Those decisions—the factual heart of Defendant's conversion, fraud on court, and retaliation claims—were made by counsel.

A. Property Handling - *Spain v. Montalvo* Controls

DIRECTLY APPLICABLE PRECEDENT:

Spain v. Montalvo, 921 S.W.2d 852 (Tex. App.—San Antonio 1996, orig. proceeding):

"The court found that Poenisch's testimony was necessary to establish essential facts regarding the alleged conversion of client files by the opposing party... Poenisch was the only witness, apart from [opposing party], who could testify about the circumstances surrounding the demand for the files and their alleged incompleteness. The court emphasized that Poenisch's testimony was central to proving the intentional conversion claim."

Application Here:

- *Spain*: Attorney's testimony necessary for conversion of client files
- **This case**: Zavarelli's testimony necessary for conversion of personal property
- *Spain*: Attorney was "only witness" to property handling
- **This case**: Zavarelli is "only witness" to October 5, 2025 property removal (Ex. T-1-6)
- *Spain*: Attorney's testimony "central to proving intentional conversion"
- **This case**: Zavarelli's testimony central to proving conversion (unauthorized October 5 removal)

Documentary Evidence:

October 5, 2025, 4:48 PM - Zavarelli Email:

"I did not hear from you. Staff have been released. All boxes and items that were in your apartment have been moved to storage unit S18, 4th floor of building 2 (your building) - next to Apartment 2431."

(Ex. T-6)

October 30, 2025 - Sortor Email:

"the items in the 4th floor storage room (placed there on October 5 after repeated attempts to obtain direction from you over that weekend - and which were ignored)"

(Ex. E)

"Ignored" = Defendant refused consent. Counsel authorized removal anyway.

Zavarelli must testify:

1. Who authorized October 5 property removal
2. Whether she knew Defendant refused consent ("ignored")
3. What authority she claimed to authorize removal

No other witness can provide this testimony. Plaintiffs (property owners) were not present; did not make litigation decisions.

B. September 8 Report Concealment - Fraud on Court

CONTESTED FACT: When did counsel receive September 8, 2025 Dallas Mold report, and why was it not disclosed at three hearings?

September 8, 2025 Dallas Mold Report states:

- "There is no equipment on site"
- "All contents should be considered contaminated"
- Flooring damage from "HVAC condensation drain line"

(Ex. B)

September 19, 2025: Plaintiffs filed suit alleging "obstruction" and Defendant "caused flooring damage"

Report NOT disclosed at:

- September 19 TRO application
- October 2 TRO hearing
- October 16 TI hearing

Plaintiffs filed MOTION FOR PROTECTIVE ORDER to conceal report.

Defendant obtained copy from MAC Assessor Dayna Boor. (Ex. B)

Zavarelli must testify:

1. When she received September 8 report
2. What she knew when filing September 19 Petition
3. Why she did not disclose at three hearings
4. Why she filed protective order to conceal report

This is essential to Defendant's fraud on court and abuse of process claims.

C. Personal Observations of Property

October 3, 2025, 2:59 PM - Zavarelli Email:

"The apartment contents are fairly extensive (as you know the court directed that every drawer and cabinet be checked- and many items were found in sealed cabinets or drawers)... There were also several boxes of items in the entry way closet- that look like maybe something you had packed and perhaps moved there, at some time."

"All medications and/or what appear to be potential medical items (pulse ox, portable BP cuff, bandages, humidifier) - are being boxed..."

"We have also located a couple of photos of your children and what looks like perhaps a craft that was made by them (I'm not sure)"

"A picture will be taken of all boxes, bags and items."

(Ex. T-1-6.)

Zavarelli personally:

- Observed contents ("you know... many items were found")
- Speculated about Defendant's packing ("maybe something you had packed")
- Handled family photos and children's items
- Ordered photographs taken

Zavarelli must testify:

1. What she personally observed during property inspection
2. What photographs show (she ordered them taken)
3. Whether September 8 protocol was followed (photos may show violations)

No other witness has this eyewitness knowledge.

D. Contradictory Statements About Testing/Contamination

October 3, 2025 - Zavarelli Email:

"Please note - no lab testing was performed as to the personal property items."
(Ex. T-2)

Defendant's October 14, 2025 Response:

"You previously indicated that no testing was done, yet you also told the Court that my belongings were contaminated. That contradiction has left me unable to make informed decisions about my property."

(Ex. T-8)

Zavarelli must testify:

1. What she told Court about contamination
2. Basis for contamination claim if "no testing"
3. Why contradictory statements were made

Essential to conversion and fraud on court claims.

E. September 19 Phone Call - Same Day Suit Filed

September 19, 2025, 31-minute phone call (same day Petition filed):

Zavarelli's statement:

"it's my understanding they've complied with all the deadlines that are required to be able to start on the 22nd"

(Ex. D)

Petition filed same day alleged "obstruction."

Zavarelli must testify:

1. What she knew about remediation status on September 19
2. Whether work was actually being "obstructed" if to "start on the 22nd"
3. What she knew when filing suit alleging "obstruction"

Essential to abuse of process claim.

F. Additional Necessary-Witness Grounds Specific to Michelle S. Sortor

Beyond her October 30, 2025 email regarding property in the storage room, Ms. Sortor is independently a necessary witness on multiple contested material facts.

1. Insurance coordination and housing cutoff

Through emails with insurer Amye Brochstein, Ms. Sortor participated in, or had knowledge of, the August 15, 2025 promise that temporary housing would continue "until remediation is completed," the August 26 non-renewal notice, and the November 3, 2025 repudiation that cut off housing based on lease expiration. Her testimony is necessary to establish whether counsel coordinated the timing and terms of the housing cutoff and whether Plaintiffs' litigation positions are consistent with what was represented to the insurer.

2. Property status and threats after removal

In her October 30, 2025 email, Ms. Sortor states that items were "placed there on October 5 after repeated attempts to obtain direction from you over that weekend – and which were ignored," and threatens "legal remedies" unless Defendant immediately removes contaminated property from storage. Only Ms. Sortor can testify what she understood about Defendant's refusal, what instructions she gave or ratified concerning the storage unit, and why she chose to threaten legal action under these circumstances. That testimony goes directly to conversion, coercion, and abuse-of-process theories.

3. Misstatements about regulation and protocol

On November 7, 2025, counsel asserted that contents cleaning "is not a regulated activity" under 16 TAC § 78, despite the MAC protocol requiring MAC/MRC-supervised pack-out and EPA Table 2 methods. Ms. Sortor's testimony is necessary to explain the basis for that statement, her understanding of the protocol, and how those representations informed decisions about handling, storing, and potentially disposing of Defendant's property.

4. Court-process characterization and ADA accommodations

Ms. Sortor communicated with the Court about scheduling and described Defendant as having "failed to comply" with hearing accommodations after the October 16, 2025 hearing, even though Defendant was present on Zoom and was not called. Only Ms. Sortor can explain what she told the Court about Defendant's appearance and communication limitations, what she knew about Defendant's disability-related requests, and why she chose to frame Defendant's conduct as noncompliant. This testimony is central to candor-to-tribunal and ADA-process issues.

5. No alternative sources

These are not matters of legal argument or uncontested background; they are disputed, material facts that go to conversion, abuse of process, fraud on the court, and ADA violations. No other witness can supply Ms. Sortor's knowledge, timing, and reasons for her decisions. Under Rule 3.08 as applied in cases such as *In re Tips* and *Spain v. Montalvo*, she is therefore a necessary witness whose continued role as trial advocate would cause actual prejudice to Defendant.

IV. ACTUAL PREJUDICE

A. Standard for Actual Prejudice

In re Texas Technical Services, Inc., 476 S.W.3d 747, 751 (Tex. App.—Houston [1st Dist.] 2015, orig. proceeding):

"The fact that an attorney serves, or may serve, as both a representative and as a witness does not in itself compel disqualification... Rather, the party requesting disqualification must demonstrate that the opposing attorney's dual roles as attorney and witness will cause the party actual prejudice."

B. Actual Prejudice Established

1. Cannot Cross-Examine Witness Who Is Also Advocate

If Zavarelli testifies as witness about property removal, Defendant must cross-examine her.

But Zavarelli as advocate will object, redirect, and argue to jury.

Jury confusion: Is Zavarelli credible witness or zealous advocate?

Dual role prejudices Defendant's ability to impeach witness.

2. Cannot Depose Counsel About Own Actions

Attorney-client privilege prevents Defendant from deposing Zavarelli about:

- Communications with client about litigation decisions
- Attorney work product (decision not to disclose September 8 report)
- Litigation strategy

But if Zavarelli testifies at trial, Defendant entitled to prior discovery.

Disqualification is ONLY way to obtain necessary testimony.

3. Essential Facts Require Counsel's Testimony

In re Duke Investments, Ltd., 454 B.R. 414, 422 (Bankr. S.D. Tex. 2011):

"Under Texas law, party moving to disqualify attorney as necessary witness in case bears burden of showing that attorney's testimony is necessary to establish an essential fact on behalf of the non-movant attorney's client, and must explain why other sources revealed in record, such as testimony of other witnesses or other pertinent records in evidence, are insufficient."

No other sources exist:

Essential Fact	Only Source
Who authorized October 5 removal	Zavarelli (her email: "I did not hear from you. Staff have been released.")
When counsel received Sept 8 report	Zavarelli/Sortor (clients don't know when counsel received)
Why report not disclosed at 3 hearings	Zavarelli/Sortor (litigation decision)
What told Court about contamination	Zavarelli/Sortor (their statements to Court)
Why filed protective order	Zavarelli/Sortor (their decision)
Personal observations during packing	Zavarelli ("We have also located photos of your children")
Insurance coordination timing	Sortor (her communications with Brochstein)

Defendant cannot prove conversion, fraud on court, or abuse of process without this testimony. This is actual prejudice.

V. PROVEN WITH SPECIFICITY

A. Standard for Specificity

Jones-Hospod v. Hospod, 676 S.W.3d at 722: "The party moving for disqualification bears the burden of proving the attorney should be disqualified 'with specificity.'"

Hendricks v. Barker, 523 S.W.3d 152, 158 (Tex. App.—Houston [14th Dist.] 2017, no pet.): "When the movant seeks disqualification based on an alleged violation of a disciplinary rule, the movant must establish the violation with specificity."

B. Specificity Established by Documentary Evidence

Not vague allegations. Exact dates, exact quotes, exact decisions:

Date	From	Exact Quote	What It Proves
Oct 3, 2:59 PM	Zavarelli	"We have also located a couple of photos of your children"	Personal observation/handling
Oct 4, 6:03 PM	Zavarelli	"here is the plan... The above course of action is not subject to change"	Personal decision-making authority
Oct 5, 4:48 PM	Zavarelli	"I did not hear from you. All boxes... have been moved"	Personal authorization of property removal
Oct 30	Sortor	"placed there on October 5... which were ignored"	Admission removal occurred after refusal
Oct 3	Zavarelli	"no lab testing was performed"	Basis for contradictory contamination claim
Oct 14	Defendant	"you told the Court... contaminated"	Challenge to what counsel told Court

Date	From	Exact Quote	What It Proves
Nov 7	Sortor	"not a regulated activity"	Misstatement about 16 TAC § 78

This is not speculation. This is documentary proof of personal involvement.

VI. NO EXCEPTION APPLIES

A. TDRPC 3.08(a) Exceptions

Rule 3.08(a) permits representation if:

1. testimony relates to uncontested matter;
2. testimony relates to nature and value of legal services;
3. testimony relates to substantial hardship on client;
4. consent after consultation; or
5. to deprive client of substantial justice

None apply here.

B. Not Uncontested Matter

Facts are hotly contested:

- Defendant alleges fraud on court (concealment)
- Defendant alleges conversion (unauthorized property removal)
- Defendant alleges abuse of process (false allegations)

Plaintiffs deny. This is contested.

C. Not Legal Services

Testimony does not relate to "nature and value of legal services." Testimony relates to counsel's decisions and actions (property removal, evidence concealment).

D. No Substantial Hardship

In re Bahn, 13 S.W.3d 865, 869 (Tex. App.—Fort Worth 2000, orig. proceeding):

"Further, if the attorney promptly notifies opposing counsel of his dual role and advises him that disqualification would work a substantial hardship on his client, he may serve as counsel."

"Letter from plaintiff's counsel... sent three days after motion to disqualify... was not 'prompt' notification."

No prompt notification here:

- Zavarelli did not notify Defendant she would be witness
- Motion filed after discovery of concealment and property removal
- Not "prompt"

No substantial hardship:

- Trial not until May 11, 2026 (6 months away)
- Plaintiffs are sophisticated entities (property management companies)
- Can retain substitute counsel
- Sortor can continue if only Zavarelli disqualified

Exception does not apply.

E. Disqualification Serves Substantial Justice

In re Guidry, 316 S.W.3d 729, 736 (Tex. App.—Houston [14th Dist.] 2010, orig. proceeding):

"Disqualification is a severe remedy... Even if a lawyer is disqualified based on the lawyer-witness rule, the lawyer can still represent the client in that case by performing out-of-court functions in the case, such as drafting pleadings, assisting with pretrial strategy, engaging in settlement negotiations, and assisting with trial strategy."

Balance:

- Zavarelli can continue out-of-court work
- Sortor can serve as trial counsel (if not also disqualified)
- Plaintiffs have 6 months to prepare
- vs. Defendant's constitutional right to fair trial

Disqualification serves justice, not hardship.

VII. INDIVIDUAL VS. FIRM-WIDE DISQUALIFICATION

A. Seeking Individual Disqualification Only

Anderson Producing Inc. v. Koch Oil Co., 929 S.W.2d 416, 420 (Tex. 1996):

"Although the court of appeals disqualified the testifying attorney from representing petitioner on remand, it did not specifically hold that the attorney could not testify, nor did it consider whether the other members of the attorney's firm were disqualified."

Defendant seeks disqualification of:

1. Glynis L. Zavarelli (personal involvement in property removal, concealment, observations)
2. Michelle S. Sortor (October 30 admission about property removal, coordination with insurance)

NOT seeking firm-wide disqualification.

B. Fifth Circuit Guidance

F.D.I.C. v. U.S. Fire Ins. Co., 50 F.3d 1304, 1309 (5th Cir. 1995):

"Whereas disqualification of the entire [firm] would be a penalty disproportionate to the potential harm at issue, the disqualification of one or two attorneys would not work such a substantial hardship on the [client] that their cause would be unfairly injured. [Attorney's] participation at trial as both advocate and witness would compromise his effectiveness and needlessly confuse his role."

Application:

- Disqualification of Zavarelli and Sortor is proportionate to harm
- Does not disqualify entire Wentz & Zavarelli firm
- Prevents confusion of roles (advocate vs. witness)

VIII. THIS IS NOT A DILATORY TACTIC

A. Courts Caution Against Tactical Use

Love v. State, 600 S.W.3d 460, 465 (Tex. App.—Fort Worth 2020, pet. ref'd):

"Courts have cautioned against using Rule 3.08 as a tactical weapon to deprive a party of their chosen counsel... Without these limitations, the rule could be improperly employed 'as a tactical weapon to deprive the opposing party of the right to be represented by the lawyer of his or her choice.'"

B. This Motion Is Based on Documentary Evidence

Not tactical. Not strategic. Based on counsel's own emails:

- October 3-5 emails (property removal decisions) (Ex. E; Ex. F; Ex. G.)
- October 30 email (admission of October 5 removal after refusal) (Ex. E)
- September 8 report concealment (protective order filed)
- Insurance coordination emails (August-November)

Defendant did not create this conflict. Counsel created it by personally involving themselves in disputed events.

IX. COURT'S INHERENT AUTHORITY

In re Meador, 968 S.W.2d 346, 352 (Tex. 1998):

"...we believe it is impossible to articulate a bright-line standard for disqualification... the trial court, giving due consideration to the importance of our discovery privileges, must consider all the facts and circumstances to determine whether the interests of justice require disqualification."

Factors supporting disqualification:

1. **Discovery abuse:** Concealed September 8 report; filed protective order
2. **Property handling:** Personally authorized removal; handled family photos
3. **Contradictory statements:** "No testing" but "contaminated"
4. **Personal observations:** "We have also located photos of your children"
5. **Central to claims:** Conversion, fraud on court, abuse of process all require counsel's testimony
6. **No other source:** Counsel are only witnesses to their own decisions
7. **6 months to trial:** Sufficient time for substitute counsel

Interests of justice require disqualification.

LEGAL STANDARD MET FOR BOTH:

Element	Zavarelli	Sortor
Necessary witness	✓ Oct 5 property removal	✓ Insurance coordination
Essential fact	✓ Conversion (property)	✓ Coordination (bad faith)
Actual prejudice	✓ Can't prove without her testimony	✓ Can't prove without her testimony
Specificity	✓ Oct 3-5 emails	✓ Sept-Nov emails
No exception	✓ No prompt notice	✓ No prompt notice

Both meet all elements. Both must be disqualified.

X. PRAYER FOR RELIEF

WHEREFORE, Defendant respectfully prays that this Court:

1. **DISQUALIFY** Glynis L. Zavarelli as counsel for Plaintiffs under TDRPC 3.08 and the Court's inherent authority;
2. **DISQUALIFY** Michelle S. Sortor as counsel for Plaintiffs under TDRPC 3.08 and the Court's inherent authority;
3. **ORDER** Plaintiffs to retain substitute counsel within 30 days;
4. **ORDER** that all pending motions be decided on written submission (ADA accommodation);
5. **ALTERNATIVELY**, if Court finds substantial hardship:
 - Appoint special counsel to represent Plaintiffs while Zavarelli/Sortor testify;
OR
 - Permit Zavarelli/Sortor to perform out-of-court functions only (no advocacy at hearings/trial);
6. **GRANT** such other and further relief as the Court deems just and proper.

Respectfully submitted,



KATHRYN COPELAND

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Defendant and Counter-Plaintiff, Attorney Pro Se

EXHIBIT LIST

Defendant relies on the exhibits identified in her Exhibit Index, including Primary Exhibits A–L (core mold, insurance, and retaliation documents), the P-series (protocol and legal-misstatement exhibits), the M-series (medical and accommodation letters), the P-series (Protocol / Legal Misstatements), and the T-series (Timeline / Emails / Court / Discovery). Specific exhibits are cited by label (for example, “Ex. A,” “Ex. P-2,” “Ex. T-3”) in the body of this Motion and in the separately filed Statement of Contested Material Facts.

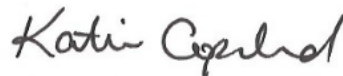
VERIFICATION

(UNSWORN DECLARATION UNDER TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Kathryn Copeland. My date of birth is June 28, 1985, and my address is 405 Crawford St., Apt. 2145, Fort Worth, Texas 76104. Pursuant to Section 132.001 of the Texas Civil Practice and Remedies Code, I declare under penalty of perjury that the factual statements contained in this

Sections I through V of the foregoing *Defendant’s Verified Statement of Contested Material Facts Requiring Counsel’s Testimony* and the exhibits attached hereto are true and correct to the best of my knowledge and belief. Additional exhibits will be filed supplementally within fourteen (14) days.

Executed in Tarrant County, Texas, on November 27, 2025.



KATHRYN COPELAND

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on all counsel of record on November 27, 2025 in accordance with the Texas Rules of Civil Procedure.

Via Electronic Service:

Glynis L. Zavarelli — gzavarelli@wandzlaw.com

Michelle S. Sortor — msortor@wandzlaw.com



KATHRYN COPELAND

Automated Certificate of eService

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Filing Description: Verified Statement of Contested Material Facts

Requiring Counsel???s Testimony (In Support of Motion to Disqualify)

Status as of 12/1/2025 9:59 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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