



322-744263-23

MOTION TO DISQUALIFY COUNSEL

05.05.25

322-744263-23

NO. 322-744263-23

FILED
TARRANT COUNTY
5/5/2025 2:55 PM
THOMAS A. WILDER
DISTRICT CLERK

IN THE 322nd DISTRICT COURT OF TARRANT COUNTY, TEXAS

IN THE INTEREST OF *M.E.M., C.R.M., two
children*)

MORGAN MICHELLE MYERS

Petitioner,

CHARLES DUSTIN MYERS,

Respondent.

MOTION TO DISQUALIFY COUNSEL

2025-05-05

TO THE HONORABLE COURT:

Respondent, CHARLES DUSTIN MYERS, hereby moves to disqualify COOPER L. CARTER, opposing counsel for Petitioner, MORGAN MICHELLE MYERS, from this matter, and in support thereof, shows the court the following:

I. INTRODUCTION

1. Cooper L. Carter was allegedly retained on January 22, 2024, in the lobby of the courtroom minutes before a scheduled reset hearing regarding a protective order originally filed on December 22, 2023. This hearing was due to begin in front of Associate Judge Jeff Kaitcer.

and her initial retainment led to the rescheduling of the matter for February 1, 2024. Her signature first appears on the document entitled “322ND **FAMILY DISTRICT COURT ASSOCIATE JUDGE'S REPORT**”. This initial pleading signed by Ms. Carter indicates that she was retained in her individual capacity, further reiterated in the **FIRST AMENDED PETITION FOR DIVORCE**, filed on January 30, 2024. Specifically, she states: “It was necessary for Petitioner to secure the services of Cooper L. Carter, a licensed attorney, to prepare and prosecute this suit.” (page 9)

2. Directly below this statement appears the letterhead **MARX, ALTMAN & JOHNSON**, a law firm operated by **RODERICK D. MARX**, the founder. To date, Mr. Marx’s signature does not appear on any pleadings filed in this matter. Notably, every pleading filed for the petitioner has been “On Behalf of Cooper Carter by Roderick Marx.” (page 11, Exhibit 4) In total, after fourteen months of litigation, Ms. Carter has had the Amended Petition for Divorce, a Motion for Pre-Trial Conference⁵, and a Motion to Consolidate filed on her behalf by Mr. Marx.⁶

II. AMBIGUITY

3. When turning to Ms. Carter’s public social media, the ambiguity becomes apparent. On her Facebook page, she claims to be a “Former Attorney at Marx, Altman & Johnson”.¹ On her LinkedIn profile, this is reiterated, where she claims to have worked for Marx, Altman & Johnson from December of 2020 until July of 2022, and claims to currently be employed with Cantey Hangar LLP as well as with ‘Associate Attorney’². Finally, when viewing her Texas State Bar profile, she claims to be employed with Marx Altman & Johnson, with the last update being

¹ <https://www.facebook.com/cooper.carter.94/>

² <https://www.linkedin.com/in/cooper-carter-501888150/>

on November 5th, 2023. It's important to note that "Marx Altman & Johnson" is not the same as "Marx, Altman & Johnson", the comma being the differentiator. These points were discussed in the Rule 12 Motion to Show Authority filed and served to Ms. Carter on September 20, 2024, which remains unresolved. It's further concerning that Ms. Carter is unable to file documents herself using the Electronic Filing Manager as required by Rule 21a of the Texas Rules of Civil Procedure, as it is registered under her prior employer's email address under Cantey Hanger.

III. GROUNDS FOR DISQUALIFICATION

4. A trial court has broad discretion to determine the consequences of professional misconduct. *State Bar of Texas v. Kilpatrick*, 874 S.W.2d 656, 659 (Tex.1994). There is a strong presumption in favor of a party's right to counsel of choice, but this presumption can be overridden by considerations relating to the integrity of the judicial process and the fair administration of justice *Gonzalez v. State*, 117 S.W.3d 831 (Tex. Crim. App. 2003). If an attorney's dishonesty threatens the fairness of the proceedings or the public's confidence in the legal system, disqualification may be justified to preserve the integrity of the process.

5. However, disqualification is not automatic upon a finding of dishonesty. The court must find that the conduct has materially affected the proceedings or the rights of the parties. In other words, disqualification is considered a severe remedy and is reserved for cases where lesser sanctions would be inadequate to address the harm or protect the integrity of the proceedings. Courts are also mindful of the potential for disqualification motions to be used as tactical weapons and require a high standard of proof before granting such relief. See *Spears v. Fourth Court of Appeals*, 797 S.W.2d 654 (Tex. 1990). The courts also consider the severity and circumstances of the misconduct, the harm caused to clients or the profession, and the need to deter future misconduct. See *Kilpatrick*. In family law matters, where the stakes are often

personal and the proceedings can be contentious, the court's primary concern is to ensure fairness and the proper administration of justice.

6. On May 9th, 2024, Ms. Carter reached out via email correspondence and requested that the Respondent fill out and sign an Income Withholding Order. After inspection, the Respondent determined that it was defective and requested that the document be corrected. No further correspondence came from Ms. Carter regarding the IWO.

7. The attached signature blocks raise serious doubts about their authenticity. In one version, the cursive signature "Holly L. Hayes" appears above a typed line, followed by a long list of attorneys (with State Bar numbers) ending in "ATTORNEY OF RECORD." In the other version, the same cursive "Holly L. Hayes" signature appears above the line, but the typed block below shows only "CHOYA BURKLEY" labeled as "ATTORNEY OF RECORD." These two versions cannot both be true. A single pleading cannot logically have two different attorneys designated as "Attorney of Record," nor can one attorney's handwritten signature be grafted onto a block naming another attorney. The inconsistencies strongly indicate that the signature block was manually altered or copied between documents, constituting a likely forgery.

8. Furthermore, upon inspection of the Certificate of Service, the font sizes are different, and it further points to the real possibility that this document was indeed forged. The timing of the document's service and the appearance of the signatures themselves also raise concern. In short, these discrepancies, while by themselves may not seem significant – when added into the mix of issues within this case – it answers more questions than it creates.

ANALYSIS

FIGURE 1

Holly L Hayes

TAMEKA D BOYD - SBN: 24027406
 CHOYA BURKLEY - SBN: 24012361
 KARLA BYRD - SBN: 24097445
 STEPHEN E HAMMEL - SBN: 24043710
 MADISON LEDOUX - SBN: 24131449
 PAULA CROCKETT - SBN: 00798123
 JOHN CASHMAN - SBN: 24038807
 HOLLY L HAYES - SBN : 24110698
 ATTORNEY OF RECORD
 CHILD SUPPORT ENFORCEMENT
 CHILD SUPPORT OFFICE
 2001 BEACH ST STE 700
 FT WORTH TX 76103-2300
 Email CSD-legal-914@oag.texas.gov
 Telephone No. (817)926-7197
 Toll Free 1(800)252-8014
 Fax No. (817)926-0522

FIGURE 2

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the below listed parties or their representatives pursuant to Rule 21a, Texas Rules of Civil Procedure, on the 28th day of June, 2024.

Holly L Hayes
 CHOYA BURKLEY
 ATTORNEY OF RECORD

9. The screenshots above are true and accurate depictions of the OAG Intervention pleading filed in this case on June 28, 2025.³

³ See Exhibit.1

When examining **FIGURE 1** and **FIGURE 2** above, key irregularities include:

i. Multiple Names vs. Single Signatory

10. In the first image, eight attorney names (with SBNs) are listed under one signature line, whereas the second image shows only one name under the same signature. This suggests that an attorney's signature was replicated on two different sets of printed names. Under Texas law, every pleading "shall be signed by at least one attorney of record in his individual name". *See* Tex. R. Civ. P. 57. It is improper to list multiple attorneys under a single signature or to designate more than one attorney as the attorney of record.

ii. Duplicate and Conflicting Names

11. The name *Holly L. Hayes* appears twice in the first block (once in script as the signature and again in print as one of the listed attorneys). In the second block, *Holly L. Hayes* appears only as the script signature, while *CHOYA BURKLEY* is the sole printed name with the title "Attorney of Record." Thus, one version implies Hayes is attorney of record and the other implies Burkley is. This direct contradiction – the same signature line paired with two different names – could only happen if the signature was misappropriated. No valid pleading would have one attorney sign their name while identifying another attorney as counsel.

iii. Inconsistent Formatting and Fonts

12. The mixture of cursive and all-caps text, the placement of underlines, and the alignment of titles differ markedly between the two blocks. For example, one shows an ornate underline beneath "Holly L. Hayes" and then a column of names, while the other has a plain signature line and only "CHOYA BURKLEY" below it. These typographical inconsistencies are not found in standard OAG filings. Legitimate Texas OAG child-support pleadings use a single, uniform signature block: one typed attorney name (with SBN and contact info) and the title

“Attorney of Record,” all aligned consistently. None of the OAG’s official pleadings include a handwritten signature of one lawyer placed over the typed name of another.

13. Taken together, the two images show a signature block that appears to have been copied or tampered with. The same handwriting is used in both, but the printed names and “Attorney of Record” designation do not match. This strongly suggests that an attorney’s actual signature (Holly Hayes’s) was duplicated onto a document that falsely names Choya Burkley as the attorney of record, or vice versa. Such conduct amounts to forgery or impersonation, misleading the court about who is actually representing the state.

IV. LEGAL STANDARD

i. Single Attorney Signature Required (Tex. R. Civ. P. 57)

14. Texas Rule of Civil Procedure 57 mandates that *“Every pleading of a party represented by an attorney shall be signed by at least one attorney of record in his individual name, with his State Bar of Texas identification number...”* By its plain terms, an attorney must personally sign pleadings. Listing multiple attorneys under one signature line, or having two different attorneys labeled as counsel on the same document, violates this rule. In a proper signature block, the printed name next to the SBN must match the person who signed.

ii. One Designated Attorney (Tex. Gov’t Code §402.029(b))

15. In child-support cases, the Attorney General must notify the parties of the specific “assistant attorney general who is the attorney of record in the case”. This statute assumes only one attorney-of-record at a time. The conflicting blocks here – one identifying Hayes and the other identifying Burkley as attorney-of-record – directly contravene this requirement. They falsely present two different individuals as the State’s attorney of record in the same case, which is impossible under §402.029.

iii. Standard OAG Practice

16. The OAG's usual practice is to have a single attorney's name and signature per pleading, with all contact information in one consistent block. Attorneys do not co-sign a single document by listing a group of names; rather, if multiple lawyers work on a case they each file separate notices or appearance forms. The aberrant format shown in the images has never been used in valid OAG submissions.

17. Because Texas law and OAG procedure require a single attorney of record to sign pleadings in his or her own name, the above anomalies strongly suggest fraud. If Ms. Hayes did not actually sign on behalf of Ms. Burkley (or vice versa), then the signature block is a fabrication: a signature was copied and paired with a false printed name. This undermines the integrity of the pleading and violates the attorney-signature rules. *See* Tex. R. Civ. P. 57. *See also* Tex. Gov't. Code 402.029.

V. STANDARD FOR DISQUALIFICATION

18. Texas courts regard a motion to disqualify counsel as an "extraordinary remedy" that should be granted only for "compelling reasons." Disqualification impinges on a litigant's right to chosen counsel, so courts apply an "exacting standard" before ordering. As our Supreme Court explained in *In re Sanders*, 153 S.W.3d 54, 57 (Tex. 2004), quoting *Spears v. Fourth Court*, 797 S.W.2d 654, 656 (Tex. 1990), "[m]ere allegations of unethical conduct or evidence showing a remote possibility of a violation of the disciplinary rules will not suffice" to disqualify an attorney.

19. Nonetheless, where true misconduct has occurred – especially misconduct directly affecting the integrity of the proceeding – courts will act. As one court put it, "[t]o protect the integrity of the judicial system, a trial court must disqualify counsel when continuing

representation will taint the trial.” *In re Sanders*, 153 S.W.3d 54, 57 (Tex. 2004). The moving party bears the heavy burden of proving disqualification is warranted. *Id.* Respondent readily meets that burden here, given Carter’s admitted violations of the Rules.

20. In disqualification motions, Texas courts consider all relevant rules: the Texas Rules of Civil Procedure, statutory provisions, and the Texas Disciplinary Rules of Professional Conduct. Under Tex. R. Civ. P. 13, an attorney’s signature certifies that the pleading is not groundless or filed for any improper purpose. Rule 13 further provides that making “statements in pleading which [the signer] know[s] to be ... false, for the purpose of securing a delay” is contemptible. Similarly, Rule 57 requires each attorney-of-record to sign pleadings with their own name and bar number. Violation of these procedural rules subjects the offending attorney to sanction. Tex. R. Civ. P. 215 authorizes a court to punish contempt or sanction parties for misconduct. Additionally, courts have inherent authority to enforce ethical standards: the Texas Supreme Court has instructed that trial judges have a duty “to regulate the legal profession when appropriate via the Texas Disciplinary Rules of Professional Conduct,” which are a “preeminent source for attorney disqualification” even though the Rules themselves are not.

iv. Carter’s actions warranting disqualification

21. Under the Disciplinary Rules, Carter’s actions are manifestly prohibited. Rule 3.03(a) (“Candor Toward the Tribunal”) forbids a lawyer from knowingly making false statements of material fact to a court or offering evidence the lawyer knows to be false.” Tex. Disciplinary R. Prof. Conduct 3.03(a). It also requires a lawyer to correct any previous material misstatement to the court. Rule 8.04(a)(3) classifies engaging in “dishonesty, fraud, deceit or misrepresentation” as professional misconduct. *See* Tex. Disciplinary R. Prof. Conduct 8.04(a)(3). Rule 1.03 (Diligence) obligates a lawyer to pursue matters zealously and not neglect a client’s case. Here,

Carter’s deliberate lies (March 14 orders), failure to correct them, and long-term neglect clearly violate these duties.

22. Because Carter’s misconduct directly taints the proceedings, the Court need not wait for a disciplinary complaint. Instead, it may disqualify counsel in the interest of justice. Texas courts have done so when counsel’s actions “prejudice[d] the fairness of the proceedings” or “violate[d] professional standards”. While we respect the high standard for disqualification, Carter’s admitted misdeeds are not “mere allegations” – they are proven by the record itself – and they strike at the heart of a fair trial.

23. Carter’s conduct on March 14, 2024, is particularly egregious and independently justifies disqualification. Carter secretly drafted and filed temporary orders falsely characterizing them as “Agreed” by Respondent, even though Respondent was present and objecting at a hearing purposed to challenge them. This is a knowing misrepresentation of material fact to the court, in direct violation of Tex. Disc. R. Prof. Conduct 3.03(a)(1) and 8.04(a)(3). It also breaches her Rule 13 certification: by signing and presenting those orders, Carter certified they were not filed for an improper purpose or in bad faith, which they clearly were. Rule 13 explicitly punishes filing pleadings “which [the signer] know[s] to be groundless and false” with contempt. This rule was violated here.

VI. CONCLUSION

In totality, Ms. Carter’s conduct mirrors not that of a zealous advocate, but rather that of an attorney who has knowingly misled the tribunal, neglected her duties, and corrupted the procedural integrity of these proceedings. Her submission of fabricated “agreed” orders on March 14, 2024 — at a hearing specifically scheduled to challenge those very orders — is not only unethical, it is a *knowing misrepresentation of material fact*, in direct violation of **Rule**

3.03(a)(1) and **Rule 8.04(a)(3)** of the **Texas Disciplinary Rules of Professional Conduct**. See *In re Meador*, 968 S.W.2d 346, 351 (Tex. 1998) (noting that "lawyers must be held to the highest standards of honesty and candor when dealing with the courts").

Additionally, Ms. Carter's failure to appear at the March 14 hearing, failure to respond to challenges, her repeated use of defective or unauthorized signature blocks, and failure to comply with Rule 57 of the Texas Rules of Civil Procedure, collectively evidence a pattern of misconduct that is not merely negligent — it is **willful, strategic, and fundamentally prejudicial**. Courts have long held that when counsel's conduct "taints the trial," disqualification is not only permitted — it is required. *In re Sanders*, 153 S.W.3d 54, 57 (Tex. 2004); *Spears v. Fourth Ct. of Appeals*, 797 S.W.2d 654, 656 (Tex. 1990).

Under **Rule 13** of the **Texas Rules of Civil Procedure**, an attorney's signature certifies that pleadings are grounded in fact and law and are not brought for any improper purpose. Filing knowingly false temporary orders without a Motion to Sign, and misrepresenting an agreement never made, constitutes sanctionable conduct. See *Nath v. Tex. Children's Hosp.*, 446 S.W.3d 355, 361 (Tex. 2014) (reiterating that sanctions are appropriate where pleadings are made in bad faith and lack evidentiary support).

Furthermore, the potential forgery or misappropriation of the OAG attorney's signature constitutes a *separate and grave violation* of Rule 57 and Texas Gov't Code § 402.029. Courts have the inherent authority to sanction and disqualify attorneys for forging or misusing names to file official pleadings. *State Bar of Tex. v. Kilpatrick*, 874 S.W.2d 656, 659 (Tex. 1994); *In re C.F., Jr.*, 141 S.W.3d 907, 913 (Tex. App.—San Antonio 2004, no pet.) (affirming sanctions where a party filed enforcement pleadings based on fictitious orders and failed to appear for hearing).

Finally, even if Ms. Carter’s conduct did not amount to outright fraud, **disqualification would still be proper** given her ongoing dereliction of duty — a year of non-prosecution, procedural noncompliance, and abandonment of her responsibility to inform the Court of her role and authority. The continued presence of such an attorney in this proceeding actively prejudices Respondent, impairs the integrity of the record, and casts a shadow over every action taken in the case. *See In re S.G.B.*, No. 05-23-00684-CV, 2025 WL 1632427, at *5 (Tex. App.—Dallas Mar. 13, 2025) (mem. op.) (“Bad faith conduct that disrupts core judicial functions warrants sanction and potential disqualification”).

VII. PRAYER

Respondent respectfully requests that this court:

1. Immediately set this matter for a hearing following the current recusal proceedings at the earliest opportunity and ORDER Holly Hayes to appear to substantiate the intervention pleading;
2. Require that COOPER L. CARTER prove her authority to represent Petitioner, MORGAN MICHELLE MYERS, in this matter.
3. If the court finds the Intervention Pleading to be fraudulent, disqualify COOPER L. CARTER from the case without reaching the other points raised in this brief for fraud upon the court;
4. If the court finds that COOPER L. CARTER cannot show her authority and no one else appears to represent MORGAN MICHELLE MYERS, strike her pleadings from the record, including the March 14, 2024, temporary orders;
5. Issue any further relief the court deems equitable given the circumstances.

Respectfully submitted,

/s/ Charles Dustin Myers
CHARLES DUSTIN MYERS
817-546-3693
CHUCKDUSTIN12@GMAIL.COM
PRO-SE RESPONDENT

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of this MOTION TO DISQUALIFY was served on all parties of record pursuant to Rule 21a of the Texas Rules of Civil Procedure on 05/05/2025 through the following:

MORGAN MICHELLE MYERS @ MORGANMW02@GMAIL.COM

through the electronic filing manager.

COOPER CARTER @ COOPERCARTER@MAJADMIN.COM

Through email.

/s/Charles Dustin Myers
CHARLES DUSTIN
MYERS

CERTIFICATE OF CONFERENCE

Ms. Carter has not responded to any correspondence regarding any motion filed in this matter. No input regarding this information was received from Ms. Carter regarding this motion.

/s/ Charles Dustin Myers
CHARLES DUSTIN
MYERS

EXHIBIT 1

322-744263-23

FILED
TARRANT COUNTY
6/28/2024 12:35 PM
THOMAS A. WILDER
DISTRICT CLERK

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NCP Name: CHARLES D MYERS

CP Name: MORGAN MYERS

OAG Number: 0014563904

LAC: INTE

CAUSE NUMBER 322-744263-23

IN THE INTEREST OF

§ IN THE 322ND DISTRICT COURT

M [REDACTED] M [REDACTED]
C [REDACTED] M [REDACTED]

§
§ OF

CHILDREN

§ TARRANT COUNTY, TEXAS

INTERVENTION

1. The OFFICE OF THE ATTORNEY GENERAL, representing the State of Texas, files this pleading pursuant to Texas Family Code Chapter 231 for which discovery is intended to be conducted under Level 2 of Rule 190, Texas Rules of Civil Procedure. The OFFICE OF THE ATTORNEY GENERAL is assigned the support and enforcement rights in this case.

THE ATTORNEY GENERAL'S RIGHT TO INTERVENE

2. The OFFICE OF THE ATTORNEY GENERAL, pursuant to Texas Family Code §§ 102.007 and 102.009 (d), is a necessary party because this is an action to establish, modify, or enforce a support right assigned to the OFFICE OF THE ATTORNEY GENERAL pursuant to Texas Family Code Chapter 231.

JURISDICTION

3. This Court has continuing jurisdiction of the children the subject of this suit because of prior proceedings.

CHILDREN

4. The following children are the subject of this suit:

Name	Sex	DOB
M [REDACTED] M [REDACTED]	F	[REDACTED]
C [REDACTED] M [REDACTED]	F	[REDACTED]

No property, other than personal effects, is owned by any child the subject of this suit.

PERSONS ENTITLED TO NOTICE

5. The children reside with MORGAN MYERS, the *mother* of the children. The OFFICE OF THE ATTORNEY GENERAL will serve MORGAN MYERS with this pleading, by and through her attorney of record, pursuant to Rule 21a, Texas Rules of Civil Procedure.

6. CHARLES D MYERS, is the *father* of the children. The OFFICE OF THE ATTORNEY GENERAL will serve CHARLES D MYERS with this pleading pursuant to Rule 21a, Texas Rules of Civil Procedure.

DETERMINATION OF DISCLOSURE OF ADDRESS

7. The Court should enter appropriate orders concerning the disclosure of the addresses of the parties.

PRIOR CHILD SUPPORT ORDER

8. On 3/14/2024 the Court ordered *CHARLES D MYERS* to pay current child support of \$973.19 *monthly*, beginning 4/1/2024, and *monthly* thereafter. The amount and frequency of *CHARLES D MYERS*'s child support obligation remains unchanged.

CHILD SUPPORT ARREARAGE

9. *CHARLES D MYERS* failed to pay court ordered child support as follows:

a. Child support accrued since 4/1/2024	\$2,919.57
b. Interest accrued since 4/1/2024	\$0.00
c. Child support paid since 4/1/2024	\$0.00
d. Total child support arrearage as of 6/18/2024	\$2,919.57

EXHIBIT A, which is attached and incorporated by reference, is a true and correct copy of a payment record indicating the occasions Obligor violated the above-referenced order.

JUDGMENT ON ARREARS

10. The Court should confirm and enter judgment for all support arrearage and accrued interest as of the court proceeding date. The Court should order payment and income withholding to liquidate the judgment pursuant to Texas Family Code Chapters 157 and 158.

SUPPORT

11. The OFFICE OF THE ATTORNEY GENERAL, representing only the interests of the State of Texas, requests the Court make appropriate orders for current child support, medical support, and dental support for the children, including temporary support pursuant to Texas Family Code § 105.001. In determining the amount of support the Court should consider the duty of parents to support their minor children, and all applicable provisions of the Texas Family Code.

WITHHOLDING FROM EARNINGS FOR SUPPORT

12. The Court should order all support withheld from disposable earnings pursuant to Texas Family Code § 158.006. The Court should order all payments of support processed pursuant to Texas Family Code Chapter 231 for distribution according to law. If appropriate, the Court should order *CHARLES D MYERS* to post a bond or security.

REQUEST FOR PRODUCTION OF DOCUMENTS

13. *CHARLES D MYERS* has in his possession documents that will show the nature and extent of his ability to pay child support. The OFFICE OF THE ATTORNEY GENERAL, pursuant to Rule 196, Texas Rules of Civil Procedure, requests him to produce and permit the OFFICE OF THE ATTORNEY GENERAL to inspect and copy the originals, or true copies, of the following documents in his possession, custody or control: (a) his IRS federal tax returns for the past two years with all schedules included with the returns and all W-2s and 1099s attached to such returns, (b) any and all W-2 statements, all 1099s, and all documents showing income received by Respondent from any source for the two tax years preceding the date of filing of this action, (c) all payroll stubs, vouchers, records of commissions and all other written

records or evidence of income received by him within the last six months, (d) the most recent Social Security Administration Form SSA-7005, showing his income history, sent to him three months before his last birthday, (e) statements of accounts for all checking or saving accounts in which he has held an interest within the last six months, (f) all evidence (policies, premium schedules, records of premiums paid, etc.) of health and/or dental insurance available at his place of employment that may provide coverage for dependent children, (g) copies of loan applications made within the last six months, (h) current statement of benefits and account balances for all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested, including but not limited to employer- or union-sponsored defined benefit or defined contribution plans and individual retirement accounts (IRAs), and (i) summary plan description of all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested. The OFFICE OF THE ATTORNEY GENERAL requests production of the specified documents at:

The Office of the Attorney General
CHILD SUPPORT OFFICE
2001 BEACH ST STE 700
FT WORTH, TX 76103-2300

on or before 3:00 p.m. on the 30th day following the date of service of this request.

PRAYER

The OFFICE OF THE ATTORNEY GENERAL prays that the Court grant all relief requested herein. The OFFICE OF THE ATTORNEY GENERAL prays for general relief.

Respectfully submitted,

Ken Paxton
Attorney General of Texas

Brent Webster
First Assistant Attorney General

Holly L Hayes

TAMEKA D BOYD - SBN: 24027406
CHOYA BURKLEY - SBN: 24012361
KARLA BYRD - SBN: 24097445
STEPHEN E HAMMEL - SBN: 24043710
MADISON LEDOUX - SBN: 24131449
PAULA CROCKETT - SBN: 00798123
JOHN CASHMAN - SBN: 24038807
HOLLY L HAYES - SBN : 24110698
ATTORNEY OF RECORD
CHILD SUPPORT ENFORCEMENT
CHILD SUPPORT OFFICE
2001 BEACH ST STE 700
FT WORTH TX 76103-2300
Email CSD-legal-914@oag.texas.gov
Telephone No. (817)926-7197
Toll Free 1(800)252-8014
Fax No. (817)926-0522

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the below listed parties or their representatives pursuant to Rule 21a, Texas Rules of Civil Procedure, on the 28th day of June, 2024.



CHOYA BURKLEY
ATTORNEY OF RECORD

Party:

MORGAN MYERS

Attorney for Party:

COOPER L CARTER
2905 LACKLAND RD.
FORT WORTH, TX 76116
COOPERCARTER@MAJADMIN.COM

CHARLES D MYERS

			Child Support		
Trans Date	Activity Type	Transaction Amount	Amount Due	Amount Applied	Balance
04/01/2024	Amount Due	973.19	973.19		973.19
05/01/2024	Amount Due	973.19	973.19		1,946.38
06/01/2024	Amount Due	973.19	973.19		2,919.57
Totals:			2,919.57	0.00	2,919.57

A

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. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Officer Filer 914 on behalf of Holly Hayes
Bar No. 24110698
csd-filer-914@texasattorneygeneral.gov
Envelope ID: 89311887
Filing Code Description: (Title IV-D OAG Use Only)Intervention
Filing Description: INTE
Status as of 6/28/2024 2:16 PM CST

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
Cooper L.Carter		coopercarter@majadmin.com	6/28/2024 12:35:54 PM	SENT

Associated Case Party: CHARLESDUSTINMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
CHARLES MYERS		chuckdustin12@gmail.com	6/28/2024 12:35:54 PM	SENT

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. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 100449540

Filing Code Description: Motion (No Fee)

Filing Description: Motion to Disqualify

Status as of 5/5/2025 3:01 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
CHARLES MYERS		chuckdustin12@gmail.com	5/5/2025 2:55:49 PM	SENT
Cooper L.Carter		coopercarter@majadmin.com	5/5/2025 2:55:49 PM	SENT
HOLLY HAYES		csd-legal-914@texasattorneygeneral.gov	5/5/2025 2:55:49 PM	SENT