

NO. 322-744263-23

**RESPONDENT'S RESPONSE IN OPPOSITION TO PETITIONER'S MOTION FOR
SANCTIONS AND REQUEST FOR ATTORNEY'S FEES**

**TO THE HONORABLE DAVID L. EVANS OF THE 8TH
ADMINISTRATIVE JUDICIAL REGION OF TEXAS:**

COMES NOW, Respondent, Charles Dustin Myers, who respectfully submits this response in opposition to Petitioner's Motion for Sanctions and Request for Attorney's Fees, and in support thereof, shows the Court the following:

I. BACKGROUND

1. On January 22, 2024, Cooper L. Carter was allegedly retained by Morgan Michelle Myers in the lobby of the 322nd District Court of Tarrant County, where her signature first appears on an Associate Judge's Report. See *Exhibit 1*.

2. On January 31, 2024, RODERICK D. MARX, a party who has not made an appearance in this case to date, filed **on behalf of Cooper Carter** a pleading entitled “First Amended Petitioner for Divorce”. See *Exhibit 2*.

3. This document states the follow pertaining to her “services”:

“It was necessary for Petitioner to secure the services of Cooper L. Carter, a licensed attorney, to prepare and prosecute this suit. To effect an equitable division of the estate of the parties and as a part of the division, and for services rendered in connection with conservatorship and support of the children, judgment for attorney's fees, expenses, and costs through trial and appeal should be granted against Respondent and in favor of Petitioner for the use and benefit of Petitioner's attorney and be ordered paid directly to Petitioner's attorney, who may enforce the judgment in the attorney's own name. Petitioner requests postjudgment interest as allowed by law.”

- *Exhibit 2, 8-9 ¶16.*

4. RODERICK D. MARX has never made an appearance in this case and has filed every document on Cooper Carter’s behalf. In total there has been just three documents submitted, which amount to a “Motion for Pre-Trial Conference” filed on April 24, 2024, a “Motion to Consolidate” in April of 2025, and the most recent document being the “Motion for Sanctions and Request for Attorney’s Fees” on October 2, 2025, which is the motion at issue.

5. Cooper L. Carter, after fraudulently securing a court order from Judge Jeffrey Kaitcer on March 14, 2024, now seeks \$10,000 in sanctions regarding a motion that she never responded to. Notwithstanding the fact that her motion is facially invalid for failing to provide exhibits justifying the \$10,000 amount, she misrepresents to the Court that the Respondent’s motions are “frivolous”. See *Exhibit 4*.

6. Cooper L. Carter does not have standing to declare Respondent’s motions “frivolous”, as she has provided no response to any of them. This is a blatant attempt to leverage her status as a licensed attorney to subvert the rule of law when, as the record clearly shows, she has been

absent from these proceedings and has not performed any duties one would expect from an attorney licensed to practice law.

II. ANALYSIS

7. The record reflects that Roderick D. Marx, who has not made an appearance in the case, has filed pleadings on behalf of Cooper Carter, and there is ambiguity as to whether Cooper Carter is the attorney of record for the petitioner. This is precisely why Cooper L. Carter was served a Rule 12 Motion on September 20, 2024, which she has yet to provide a response to. This creates several procedural concerns:

- i. **First**, if Cooper Carter is not the attorney of record, or if filings are being made by someone without authority, the request for attorney's fees and sanctions is procedurally improper and should be denied. The Texas Civil Practice and Remedies Code § 10.001 and Texas Rule of Civil Procedure 13 both require that pleadings and motions be signed by an attorney or party with proper authority, and the signature constitutes a certification of good faith and proper purpose. If a pleading or motion is filed or signed by someone who is not the attorney of record or who lacks authority to represent the party, the filing is procedurally improper and may be subject to sanctions itself (Tex. Civ. Prac. and Rem. Code § 10.001; Tex. R. Civ. P. 13).
- ii. **Second**, the request for attorney's fees must be supported by clear evidence of the services rendered and the reasonableness of the fees sought. In this case, the request for \$10,000 in attorney's fees is based on the filing of a small number of documents over a two-year period, and there is no evidence provided to support the reasonableness or necessity of the fees. Texas courts require that attorney's

fees be reasonable and necessary, and the party seeking fees bears the burden of proof (*Shilling v. Gough*, 393 S.W.3d 555 (Tex. App. 2013)).

- iii. **Third**, the procedural irregularity of having pleadings filed by someone who has not made an appearance in the case further undermines the validity of the request for attorney's fees and sanctions. Texas law requires strict compliance with procedural rules regarding representation and the signing of pleadings, and any deviation from these requirements renders the request for attorney's fees and sanctions procedurally defective and subject to denial (Tex. Civ. Prac. and Rem. Code § 10.001; Tex. R. Civ. P. 13).

8. The record also reflects that Cooper L. Carter seeks \$10,000 in sanctions regarding a motion that 1) was never filed and 2) to which no opposition was filed. Instead, this motion for sanctions was filed in response to this Court's erroneous order which, for the second time, misrepresented the pleadings filed by the Respondent.

III. CONCLUSION

9. This response was more of a formality. The violations that continue to occur in this case can only be attributed to a willful disregard for the law. The Court is actively choosing to condone the behavior of Cooper L. Carter to the Respondent's detriment, and the Court is hereby put on notice that Respondent will be initiating a Federal RICO Claim against Judge James Munford, Judge Jeff Kaitcer, Court Coordinator Lindsey Baker, and Attorney Cooper L. Carter.

10. The collective actions of these individuals have created a systemic breakdown of justice, a mockery of the Texas legal system, and the record before this Court that has been meticulously crafted by the Respondent, exists in the public domain, and remains unopposed by any party.

11. For all reasons stated herein, Petitioner's Motion for Sanctions should be **DENIED**.

12. A copy of this pleading will be mailed to the Tom Vandergriff Civil Courts Building 100 N Calhoun St, 2nd Floor Fort Worth, TX 76196.

IV. PRYER

13. WHEREFORE, all premises considered, Respondent, CHARLES DUSTIN MYERS, prays that this Court:

- i. Deny Petitioner's Motion for Sanctions and Request for Attorney's Fees for not containing the required exhibits as the Court ordered;
- ii. Take judicial notice that Respondent has no choice but to pursue a Federal claim to prevent permanent loss of his fundamental interests in the absence of any clarity or intervention;
- iii. Grant any further relief that the Court deems necessary, both in law and in equity.

Respectfully submitted,

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

CERTIFICATE OF SERVICE

On this ^{10th day of October, 2025, Respondent certifies that all parties of record have been served this “Response in Opposition to Petitioner’s Motion for Sanctions and Request for Attorney’s Fees” pursuant to Rule 21a of the Texas Rules of Civil Procedure, and a file-stamped copy of this pleading has been mailed to Tom Vandergriff Civil Courts Building 100 N Calhoun St, 2nd Floor Fort Worth, TX 76196, and an electronic copy was emailed to thkemp@tarrantcounty.com to ensure the Court receives the correct document, as originally filed.}

/s/ *Charles Dustin Myers*
CHARLES DUSTIN MYERS
PRO SE RESPONDENT

EXHIBIT 1

322ND FAMILY DISTRICT COURT

ASSOCIATE JUDGE'S REPORT

CAUSE NUMBER: 322 - 744538-23

FILED
 TARRANT COUNTY
 1/23/2024 8:14 AM
 THOMAS A. WILDER
 DISTRICT CLERK

ITMOTMO/INRE

322-744538-23

Morgan Myers
AND
Charles Myers

§
 §
 §
 §

IN THE DISTRICT COURT
 TARRANT COUNTY, TEXAS
 322ND JUDICIAL DISTRICT

RESET DATE AND TIME: 2/1/2024 at 9:00 A.M.

1. Appearances:

- Petitioner/Movant appeared in person and by attorney Cooper Carter
 Respondent appeared in person and by attorney Dan Becker

2. Issue(s): Custody Visitation Child Support Health Insurance CPSDISPUTE TEMP. ORDERS & APP. FOR P.O.3. Order(s) or Agreement(s): Motion for Continuance requested
by Petitioner. The court grants continuance
and res-ssets all issues for 2/1/2024
at 9:00 A.M.

RESPONDENT, CHARLES MYERS TO HAVE POSSESSION
OF THE CHILDREN FROM FRIDAY, JAN 26, 2024, 6:00 PM - SUNDAY 1/28/24
RESPONDENT TO PICK UP AND DROP OFF CHILDREN AT
AT 6641 ANNE CT, WATAUGA, TX 6:00 PM

AGREED AS TO FORM AND SUBSTANCE:

Attorney for Petitioner

Petitioner

Attorney for Respondent

Respondent

SO ORDERED:

322nd Associate Judge

1/22/24

Date



A CERTIFIED COPY
 ATTEST: 04/15/2024
 THOMAS A. WILDER
 DISTRICT CLERK
 TARRANT COUNTY, TEXAS
 BY: /s/ Catherine Saenz

Automated Certificate of eService

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Envelope ID: 83674346

Filing Code Description: No Fee Documents

Filing Description:

Status as of 1/24/2024 8:13 AM CST

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	1/23/2024 8:14:14 AM	SENT
Cooper Carter		COOPERCARTER@MAJADMIN.COM	1/23/2024 8:14:14 AM	SENT

Associated Case Party: CHARLESDUSTINMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
CHARLES MYERS		chuckdustin12@gmail.com	1/23/2024 8:14:14 AM	SENT
Daniel Bacalis		DBACALIS@DBACALIS.COM	1/23/2024 8:14:14 AM	SENT



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ATTEST: 04/15/2024
THOMAS A. WILDER
DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

EXHIBIT 2

NO. 322-744263-23**IN THE MATTER OF
THE MARRIAGE OF****MORGAN MYERS
AND
CHARLES MYERS****AND IN THE INTEREST OF
M [REDACTED] M [REDACTED] AND C [REDACTED]
M [REDACTED], CHILDREN****IN THE DISTRICT COURT****§****§****§****§****§****§****322ND JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS****FIRST AMENDED PETITION FOR DIVORCE****1. *Discovery Level***

Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

2. *Parties*

This suit is brought by MORGAN MYERS, Petitioner.

CHARLES MYERS is Respondent.

3. *Domicile*

Petitioner has been a domiciliary of Texas for the preceding six-month period and a resident of this county for the preceding ninety-day period.

4. *Service*

No service on Respondent is necessary at this time.

5. *Protective Order Statement*

An application for a protective order under title 4 of the Texas Family Code is pending with regard to a party. The application for protective order was filed in December 22, 2023 in the 322nd Judicial District Court in Cause No. 322-744538-23.



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6. *Dates of Marriage and Separation*

The parties were married on or about July 20, 2015, and ceased to live together as spouses on or about December 1, 2023.

7. *Grounds for Divorce*

The marriage has become insupportable because of discord or conflict of personalities between Petitioner and Respondent that destroys the legitimate ends of the marriage relationship and prevents any reasonable expectation of reconciliation.

8. *Children of the Marriage*

Petitioner and Respondent are parents of the following children of this marriage who are not under the continuing jurisdiction of any other court:

Name: M [REDACTED] M [REDACTED]

Sex: female

Birth date: [REDACTED]

Name: C [REDACTED] M [REDACTED]

Sex: female

Birth date: [REDACTED]

There are no court-ordered conservatorships, court-ordered guardianships, or other court-ordered relationships affecting the children the subject of this suit.

Information required by section 154.181(b) and section 154.1815 of the Texas Family Code will be provided at a later date.

No property of consequence is owned or possessed by the children the subject of this suit.

Petitioner and Respondent, on final hearing, should be appointed joint managing conservators. Petitioner requests the Court to apportion the rights and duties of a parent set out in



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section 153.132 of the Texas Family Code.

Petitioner should be designated as the conservator who has the exclusive right to designate the primary residence of the children. Respondent should be ordered to provide support for the children, including the payment of child support and medical and dental support in the manner specified by the Court. Petitioner requests that the payments for the support of the children survive the death of Respondent and become the obligations of Respondent's estate.

9. Division of Community Property

Petitioner believes Petitioner and Respondent will enter into an agreement for the division of their estate. If such an agreement is made, Petitioner requests the Court to approve the agreement and divide their estate in a manner consistent with the agreement. If such an agreement is not made, Petitioner requests the Court to divide their estate in a manner that the Court deems just and right, as provided by law.

10. Separate Property

Petitioner owns certain separate property that is not part of the community estate of the parties, and Petitioner requests the Court to confirm that separate property as Petitioner's separate property and estate.

11. Request for Temporary Orders and Injunction

Petitioner requests the Court, after notice and hearing, to dispense with the issuance of a bond, to make temporary orders and issue any appropriate temporary injunctions for the preservation of the property and protection of the parties as deemed necessary and equitable. Petitioner requests that the Court enjoin Respondent from the following:

1. Communicating with Petitioner in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic



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messaging, in vulgar, profane, obscene, or indecent language or in a coarse or offensive manner.

2. Threatening Petitioner in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, to take unlawful action against any person.
3. Placing one or more telephone calls, anonymously, at any unreasonable hour, in an offensive and repetitious manner, or without a legitimate purpose of communication.
4. Causing bodily injury to Petitioner or to a child of either party.
5. Threatening Petitioner or a child of either party with imminent bodily injury.
6. Destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of one or both of the parties.
7. Falsifying any writing or record, including an electronic record, relating to the property of either party.
8. Misrepresenting or refusing to disclose to Petitioner or to the Court, on proper request, the existence, amount, or location of any tangible or intellectual property of one or both of the parties, including electronically stored or recorded information.
9. Damaging or destroying the tangible or intellectual property of one or both of the parties, including electronically stored or recorded information.
10. Tampering with the tangible or intellectual property of one or both of the parties, including electronically stored or recorded information, and causing pecuniary loss to Petitioner.
11. Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of one or both of the parties, whether personal property, real property, or intellectual property, and whether separate or community property, except as specifically authorized by order of this Court.



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12. Incurring any debt, other than legal expenses in connection with this suit, except as specifically authorized by order of this Court.

13. Withdrawing money from any checking or savings account in any financial institution for any purpose, except as specifically authorized by order of this Court.

14. Spending any money in either party's possession or subject to either party's control for any purpose, except as specifically authorized by order of this Court.

15. Withdrawing or borrowing money in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan, employee savings plan, individual retirement account, or Keogh account of either party, except as specifically authorized by order of this Court.

16. Withdrawing, transferring, assigning, encumbering, selling, or in any other manner alienating any funds or assets held in any brokerage account, mutual fund account, or investment account by one or both parties, regardless of whether the funds or assets are community or separate property and whether the accounts are self-managed or managed by a third party, except as specifically authorized by order of this Court.

17. Withdrawing or borrowing in any manner all or any part of the cash surrender value of any life insurance policy on the life of either party or the parties' children, except as specifically authorized by order of this Court.

18. Entering any safe-deposit box in the name of or subject to the control of one or both of the parties, whether individually or jointly with others.

19. Changing or in any manner altering the beneficiary designation on any life insurance policy on the life of either party or the parties' children.

20. Canceling, altering, failing to renew or pay premiums on, or in any manner



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affecting the level of coverage that existed at the time this suit was filed of, any life, casualty, automobile, or health insurance policy insuring the parties' property or persons including the parties' children.

21. Opening or diverting mail or e-mail or any other electronic communication addressed to Petitioner.

22. Signing or endorsing Petitioner's name on any negotiable instrument, check, or draft, including a tax refund, insurance payment, and dividend, or attempting to negotiate any negotiable instrument payable to Petitioner without the personal signature of Petitioner.

23. Taking any action to terminate or limit credit or charge cards in the name of Petitioner.

24. Discontinuing or reducing the withholding for federal income taxes from either party's wages or salary.

25. Destroying, disposing of, or altering any financial records of the parties, including but not limited to a canceled check, deposit slip, and other records from a financial institution, a record of credit purchases or cash advances, a tax return, and a financial statement.

26. Destroying, disposing of, or altering any e-mail, text message, video message, or chat message or other electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage or in another electronic storage medium.

27. Modifying, changing, or altering the native format or metadata of any electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium.



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28. Deleting any data or content from any social network profile used or created by either party or the parties' children.

29. Using any password or personal identification number to gain access to Petitioner's e-mail account, bank account, social media account, or any other electronic account.

30. Terminating or in any manner affecting the service of water, electricity, gas, telephone, cable television, or any other contractual service, including security, pest control, landscaping, or yard maintenance, at the home in which she current resides or in any manner attempting to withdraw any deposits for service in connection with any of those services.

31. Excluding Petitioner from the use and enjoyment of the residence in which she currently resides.

32. Entering, operating, or exercising control over any motor vehicle in the possession of Petitioner.

1. Tracking or monitoring personal property or a motor vehicle in the possession of Petitioner, without Petitioner's effective consent, including by using a tracking application on a personal electronic device in the possession of Petitioner, using a tracking device, or physically following Petitioner or causing another to physically follow Petitioner.

Petitioner requests that Respondent be authorized only as follows:

To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation, and medical care.

To make expenditures and incur indebtedness for reasonable attorney's fees and expenses in connection with this suit.

13. Request for Temporary Orders Concerning Use of Property

Petitioner requests the Court, after notice and hearing, for the preservation of the property



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and protection of the parties, to make temporary orders and issue any appropriate temporary injunctions respecting the temporary use of the parties' property as deemed necessary and equitable, including but not limited to the following:

Awarding Petitioner the exclusive use and possession of the residence in which she currently resides, as well as the furniture, furnishings, and other personal property at that residence, while this case is pending, and enjoining Respondent from entering or remaining on the premises of the residence and exercising possession or control of any of this personal property, except as authorized by order of this Court.

Awarding Petitioner exclusive use and control of any motor vehicle in her possession and enjoining Respondent from entering, operating, or exercising control over it.

14. Request for Temporary Orders Regarding Children

Petitioner requests the Court, after notice and hearing, to dispense with the necessity of a bond and to make temporary orders and issue any appropriate temporary injunctions for the safety and welfare of the children of the marriage as deemed necessary and equitable, including but not limited to the following:

Appointing Petitioner and Respondent temporary joint managing conservators, and designating Petitioner as the conservator who has the exclusive right to designate the primary residence of the children. Petitioner requests the Court to apportion the rights and duties of a parent set out in section 153.132 of the Texas Family Code.

15. Request for Permanent Injunction

Petitioner requests the Court, after trial on the merits, to grant the following permanent injunction:

16. Attorney's Fees, Expenses, Costs, and Interest



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It was necessary for Petitioner to secure the services of Cooper L. Carter, a licensed attorney, to prepare and prosecute this suit. To effect an equitable division of the estate of the parties and as a part of the division, and for services rendered in connection with conservatorship and support of the children, judgment for attorney's fees, expenses, and costs through trial and appeal should be granted against Respondent and in favor of Petitioner for the use and benefit of Petitioner's attorney and be ordered paid directly to Petitioner's attorney, who may enforce the judgment in the attorney's own name. Petitioner requests postjudgment interest as allowed by law.

17. Prayer

Petitioner prays that citation and notice issue as required by law and that the Court grant a divorce and all other relief requested in this petition.

Petitioner prays that the Court, after notice and hearing, grant a temporary injunction enjoining Respondent, in conformity with the allegations of this petition, from the acts set forth above while this case is pending.

Petitioner prays that, on final hearing, the Court enter a permanent injunction enjoining Respondent, in conformity with the allegations of this petition, from the acts set forth above.

Petitioner prays for attorney's fees, expenses, and costs as requested above.

Petitioner prays for general relief.

Respectfully submitted,

MARX ALTMAN & JOHNSON
2905 Lackland Rd.
FT. WORTH, Texas 76116
Tel: (817) 926-6211
Fax: (817) 926-6188



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

By:/s/ *Cooper L. Carter*

Cooper L. Carter
State Bar No. 24121530
coopercarter@majadmin.com
Attorney for Petitioner



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Roderick Marx on behalf of Cooper Carter

Bar No. 24121530

MAJFIRM@YAHOO.COM

Envelope ID: 84016389

Filing Code Description: Amended Filing

Filing Description: FIRST AMENDED PETITION FOR DIVORCE

Status as of 2/1/2024 11:35 AM CST

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		morganmw02@gmail.com	1/31/2024 5:08:20 PM	SENT

Associated Case Party: CHARLESDUSTINMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
Daniel Bacalis		service@dbacalis.com	1/31/2024 5:08:20 PM	SENT
Tammy L.Johnson		tjohnson@dbacalis.com	1/31/2024 5:08:20 PM	SENT
Daniel R.Bacalis		dbacalis@dbacalis.com	1/31/2024 5:08:20 PM	SENT
CHARLES MYERS		chuckdustin12@gmail.com	1/31/2024 5:08:20 PM	SENT



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ATTEST: 04/15/2024
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DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

EXHIBIT 3

NO. 233-765358-25

IN THE INTEREST OF

**M█████ M█████ AND C█████
MYERS,**

CHILDREN

§ IN THE DISTRICT COURT

**§
§ 233RD JUDICIAL DISTRICT**

**§
§ TARRANT COUNTY, TEXAS**

NO. 322-744263-23

**IN THE MATTER OF
THE MARRIAGE OF**

**MORGAN MYERS
AND
CHARLES MYERS**

**AND IN THE INTEREST OF
M█████ MYERS AND
C█████ M█████**

§ IN THE DISTRICT COURT

**§
§ 322ND JUDICIAL DISTRICT**

**§
§ TARRANT COUNTY, TEXAS**

MOTION TO CONSOLIDATE

This Motion to Consolidate the above lawsuits is brought by MORGAN MYERS, who shows in support:

1. These lawsuits involve common questions of law or of fact as the parties have a current divorce case pending in the 322nd Judicial District Court, Cause No. 322-744263-23.
2. It would serve the convenience of the Court, litigants, and counsel and would avoid multiplicity of suits, duplication of testimony, and unnecessary expense and delay to have these lawsuits consolidated for trial.

MORGAN MYERS prays that the Court grant the Motion to Consolidate and consolidate these lawsuits under the older and lower cause number.

Respectfully submitted,

MARX ALTMAN & JOHNSON
2905 Lackland Rd.
FT. WORTH, Texas 76116
Tel: (817) 926-6211
Fax: (817) 926-6188

By: /s/ Cooper L. Carter
Cooper L. Carter
State Bar No. 24121530
coopercarter@majadmin.com
Attorney for MORGAN MYERS

Certificate of Service

I certify that a true copy of this Motion to Consolidate was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on March 20, 2025:
CHARLES MYERS by electronic filing manager.

/s/ Cooper L. Carter
Cooper L. Carter
Attorney for MORGAN MYERS

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Roderick Marx on behalf of Cooper Carter
Bar No. 24121530
MAJFIRM@YAHOO.COM
Envelope ID: 98671723
Filing Code Description: Motion (No Fee)
Filing Description: MOTION TO CONSOLIDATE
Status as of 3/20/2025 4:52 PM CST

Associated Case Party: CHARLESDUSTINMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
CHARLES MYERS		chuckdustin12@gmail.com	3/20/2025 8:38:49 AM	SENT

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	3/20/2025 8:38:49 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	3/20/2025 8:38:49 AM	SENT
CHARLES DMYERS		CHUCKDUSTIN12@GMAIL.COM	3/20/2025 8:38:49 AM	SENT

EXHIBIT 4

NO. 322-744263-23

**IN THE MATTER OF
THE MARRIAGE OF**

**MORGAN MYERS
AND
CHARLES MYERS**

**AND IN THE INTEREST OF
M█████ MYERS AND C█████
M█████, CHILDREN**

IN THE DISTRICT COURT

§

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§

322ND JUDICIAL DISTRICT

§

TARRANT COUNTY, TEXAS

§

MOTION FOR SANCTIONS AND REQUEST FOR ATTORNEY'S FEES

Comes now, Morgan Myers, and asks the Court to impose appropriate sanctions against Charles Myers for filing multiple groundless filings.

Charles Myers has violated Rule 13, Section 9.011, and Section 10.001 by filing multiple frivolous pleadings that have no basis in fact or law for the purpose of harassing. Charles Myer's actions should be sanctioned.

Morgan Myers requests a judgment of ten thousand dollars (\$10,000.00) for her attorney's fees incurred as a result in the frivolous filings by Charles Myers, payable directly to her attorney of record, Cooper Carter.

For these reasons, Morgan Myers, asks the Court, to impose the sanctions requested herein. Morgan Myers further requests the fees, expenses, and costs requested herein. Morgan Myers prays for general relief.

MARX, ALTMAN, & JOHNSON
2905 Lackland Road
Fort Worth, TX 76116
Tel: (817) 926-6211
Fax: (817) 926-6188

By: /s/ Cooper L. Carter
Cooper L. Carter

State Bar No. 24121530
coopercarter@majadmin.com

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on October 2, 2025.

/s/ Cooper Carter
Cooper Carter
Attorney for Morgan Myers