

No. 67843



FILED

Jul 18 2025

THE BOARD of DISCIPLINARY APPEALS
Appointed by the Supreme Court of Texas

**Before the Board of Disciplinary Appeals
Appointed by
The Supreme Court of Texas**

LAUREN ASHLEY HARRIS
STATE BAR OF TEXAS CARD NO. 24080932,
APPELLANT

V.

COMMISSION FOR LAWYER DISCIPLINE,
APPELLEE

*On Appeal from an Evidentiary Panel
For the State Bar of Texas District 14
No. 202000647 [North]*

**APPELLEE'S OPPOSED MOTION TO STRIKE APPELLANT'S BRIEF AND TO DISMISS
APPEAL**

SEANA WILLING
CHIEF DISCIPLINARY COUNSEL

MICHAEL G. GRAHAM
APPELLATE COUNSEL

ROYCE LEMOINE
DEPUTY COUNSEL FOR
ADMINISTRATION

OFFICE OF THE CHIEF DISCIPLINARY
COUNSEL
COMMISSION FOR LAWYER DISCIPLINE
STATE BAR OF TEXAS
P.O. Box 12487
AUSTIN, TEXAS 78711-2487
Michael.Graham@texasbar.com
T: (512) 427-1350; (877) 953-5535
F: (512) 427-4253

No. 67843

**Before the Board of Disciplinary Appeals
Appointed by
The Supreme Court of Texas**

LAUREN ASHLEY HARRIS
STATE BAR OF TEXAS CARD NO. 24080932,
APPELLANT

V.

COMMISSION FOR LAWYER DISCIPLINE,
APPELLEE

*On Appeal from an Evidentiary Panel
For the State Bar of Texas District 14
No. 202000647 [North]*

**APPELLEE’S OPPOSED MOTION TO STRIKE APPELLANT’S BRIEF AND TO DISMISS
APPEAL**

TO THE HONORABLE BOARD OF DISCIPLINARY APPEALS:

Appellee, the Commission for Lawyer Discipline (the “Commission”), asks the Board to strike Appellant’s Brief and to dismiss this appeal, pursuant to: (1) the Board’s Order in this case dated July 3, 2025 (the “July 3rd Order”); (2) Rule 2.23 of the Texas Rules of Disciplinary Procedure; (3) and Rules 1.05(a)(2), 4.05(d), (f) & 4.09 of the Board’s Internal Procedural Rules (the “BODA IPRs”). In support of this request the Commission respectfully shows as follows.

I.

On **January 27, 2023**, an Evidentiary Panel for State Bar of Texas District 14 entered an Order Granting Motion for Default Judgment against Appellant, Lauren Ashley Harris, in Case No. 20200647, styled *Commission for Lawyer Discipline v. Lauren Ashley Harris*. [CR 183]. On **February 7, 2023**, the Evidentiary Panel entered a Default Judgment of Partially Probated Suspension (the "Judgment"). [CR 195-202].

Appellant filed her Notice of Appeal on **May 8, 2023**.¹ [CR 653-656].

II.

Appellant first requested an extension of time in which to file her brief in this case, by motion filed June 13, 2024.² The Board granted that motion by Order dated June 14, 2024, giving Appellant until **July 15, 2024**, to file her brief. Rather than filing her brief per that order, Appellant instead filed her 1st Amended Motion for a Complete & Accurate Clerk's Record: Corrections & Supplement & Unopposed Request for Extension of Time to File Appellant's Brief (filed July 16, 2024).³ The

¹ The Commission previously sought dismissal of Harris's appeal for want of appellate jurisdiction, arguing that she failed to timely perfect her appeal. The Board denied the Commission's motion on August 15, 2023.

² Appellant ostensibly sought that first extension, at least in part, as she had just retained counsel after having previously proceeded *pro se*.

³ Also pending at that time was Appellant's previously filed Motion to Correct and Supplement the Reporter's Record (filed July 31, 2023).

Commission responded, at length, to Appellant's motions regarding the record on August 9, 2024.

On **March 12, 2025**, the Board issued its Order (the "March 12th Order") denying Appellant's above-referenced motions regarding the appellate record. The Board's March 12th Order required Appellant to file her brief on or before **April 11, 2025**. The March 12th Order also expressly advised Appellant regarding the word count limitation contained in BODA Internal Procedural Rule 4.05(d).

On **April 11, 2025**, Appellant filed her Unopposed Motion to Withdraw as Counsel for Appellant & Unopposed Motion for Extension of Time to File Appellant Brief. That motion sought the withdrawal of her prior counsel, Carpenter & Associates, as well as an additional extension of time in which to file her brief, as she would either again be proceeding *pro se* or would need to retain new counsel. On **April 15, 2025**, the Board issued its Order on Motion to Withdraw as Counsel for Appellant and Motion for Extension of Time (the "April 15th Order"). The April 15th Order required Appellant to file her brief on or before **April 29, 2025**. Appellant did not meet this deadline, nor did she file any motion for extension of time or other similar request for relief.

On **June 17, 2025**, the Board issued its Order to Show Cause, requiring Appellant to respond and show cause why her appeal should not be dismissed for want of prosecution, on or before June 27, 2025. Appellant then filed her Motion for

Leave to File Out-of-Time Brief, Exceed Word Limit & Appellant's TRAP 38.5(A)(4) Notice. Along with that motion was Appellant's proposed 40,000+ word brief.

In its July 3rd Order, the Board granted Appellant's motion for leave to file her brief out of time under the following conditions: (1) Appellant's motion for leave to exceed the word limit set forth in BODA IPR 4.05(d) was **denied**, and the Board **struck** both the proposed brief she filed on June 27th and the proposed appendix she filed on June 30th; and (2) Appellant was required to file a brief conforming to the requirements of BODA's IPRs no later than 5:00 p.m. on July 11, 2025. Appellant has not complied with the July 3rd Order.

III.

First, Appellant's Brief was submitted by email to the BODA Clerk at 6:01 p.m., on Friday, July 11, 2025. [Exh. A]. The Board acknowledged Appellant's late submission of same on Wednesday, July 16, 2025, and file-stamped it accordingly. [Exh. B]. Thus, Appellant's Brief was not submitted timely as it was filed on Monday, July 14, 2025. *See* TEX. BD. DISCIPLINARY APP. INTERNAL PROC. R. 1.05(a)(2); July 3rd Order; [Exh. B]. Appellant did not request an extension of time or leave to file her brief out of time or explain her failure to timely file her brief.

Second, Appellant's Brief exceeds the word count limitation of BODA IPR 4.05(d). Appellant's Certificate of Compliance included with her brief inaccurately

certifies that the brief contains “14,775 words as permitted by the Board’s Internal Procedural Rule 4.05(d).” BODA IPR 4.05(d) requires the word count for briefs to include, “every word and every part of the document, including headings, footnotes, and quotations...except the following: caption, identity of the parties and counsel, statement regarding oral argument, table of contents, index of authorities, statement of the case, statement of issues presented, statement of the jurisdiction, signature, proof of service, certificate of compliance, and appendix.” TEX. BD. DISCIPLINARY APP. INTERNAL PROC. R. 4.05(d).

A review of all sections of Appellant’s Brief required to be counted for the purposes of BODA IPR 4.05(d) shows a word count of **17,087** – more than 2,000 words in excess of the amount permitted (and 2,300+ words more than Appellant certified).⁴ See TEX. BD. DISCIPLINARY APP. INTERNAL PROC. R. 4.05(d); July 3rd Order. Thus, Appellant’s Brief exceeds BODA IPR 4.05(d)’s word count limit. [Id.]. Appellant did not request leave to exceed the word count limit.

Conclusion and Prayer

Appellant’s Brief was not timely filed, nor does it comply with the word count limitation. See TEX. BD. DISCIPLINARY APP. INTERNAL PROC. R. 1.05(a)(2) &

⁴ This word count was obtained by: (1) converting Appellant’s Brief from .pdf into a Microsoft Word document; and then (2) running the Microsoft word count review for the relevant sections of the brief. Additionally, the undersigned also attempted a hand count of the relevant sections of the brief – *that* count showed a word count of over 18,000 words.

4.05(d); July 3rd Order. For these reasons, the Commission requests the Board strike Appellant's Brief and dismiss this appeal or affirm the evidentiary panel's Judgment. *See* TEX. BD. DISCIPLINARY APP. INTERNAL PROC. R. 4.05(f), 4.09(c); July 3rd Order.

RESPECTFULLY SUBMITTED,

SEANA WILLING
CHIEF DISCIPLINARY COUNSEL

ROYCE LEMOINE
DEPUTY COUNSEL FOR ADMINISTRATION

MICHAEL G. GRAHAM
APPELLATE COUNSEL

OFFICE OF THE CHIEF DISCIPLINARY
COUNSEL
STATE BAR OF TEXAS
P.O. Box 12487
AUSTIN, TEXAS 78711
Michael.Graham@texasbar.com
T: (512) 427-1350; (877) 953-5535
F: (512) 427-4253



MICHAEL G. GRAHAM
STATE BAR CARD NO. 24113581
ATTORNEY FOR APPELLEE

CERTIFICATE OF CONFERENCE

I hereby certify that I attempted to confer with Appellant by email to lauren@lahlegal.com and laurenlahlegal@gmail.com regarding the substance of the foregoing motion on July 17, 2025. As of the filing of this motion, Appellant has not responded, so the motion is labeled as **opposed**.



MICHAEL G. GRAHAM
APPELLATE COUNSEL
STATE BAR OF TEXAS

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing Appellee's Opposed Motion to Strike Appellant's Brief and to Dismiss Appeal has been served on Appellant, Lauren Ashley Harris, by email to lauren@lahlegal.com and laurenlahlegal@gmail.com on the 18th day of July, 2025.



MICHAEL G. GRAHAM
APPELLATE COUNSEL

Exh. A

From: [Lauren H](#)
To: [TXBODA Filing](#)
Cc: [Lauren Harris](#); [Michael Graham](#); [Lauren Baisdon](#); [Jenny Hodgkins](#); [Matthew Greer](#)
Subject: Re: BODA # 67842 Lauren Ashley Harris
Date: Friday, July 11, 2025 6:01:39 PM
Attachments: [2025.07.11 BODA--Appellant's Brief & Appendix--67843.pdf](#)

Some people who received this message don't often get email from laurenlahlegal@gmail.com. [Learn why this is important](#)

BODA et al,
Please see the comporting Appellant's Brief and Appendix attached hereto.

Lauren A. Harris

On Thu, Jul 3, 2025 at 11:12 PM TXBODA Filing <filing@txboda.org> wrote:

Counsel,

Please see the attached Order issued by the Board of Disciplinary Appeals.

Matthew J. Greer

Deputy Director / Counsel

The Board of Disciplinary Appeals

P.O. Box 12426

Austin, TX 78711

Phone: (512) 427.1578

Fax: (512) 427.4366

Matthew.Greer@TexasBar.com

Exh. B

From: [TXBODA Filing](#)
To: [Lauren H](#)
Cc: [Lauren Harris](#); [Michael Graham](#); [Lauren Baisdon](#); [Jenny Hodgkins](#); [Matthew Greer](#)
Subject: RE: BODA # 67842 Lauren Ashley Harris
Date: Wednesday, July 16, 2025 1:59:05 PM
Attachments: [image001.png](#)
[Harris 67843 Appellant's Brief 7.14.pdf](#)

Appellant's brief was received at 6:02 p.m. on Friday, July 11, 2025. Pursuant to BODA Internal Procedural Rule 1.05(a)(2), it is considered filed on July 14, 2025. Thus, Appellee's brief is due **Wednesday, August 13, 2025**.

File stamped copy is attached.



From: Lauren H <laurenlahlegal@gmail.com>
Sent: Friday, July 11, 2025 5:59 PM
To: TXBODA Filing <filing@txboda.org>
Cc: Lauren Harris <lauren@lahlegal.com>; Michael Graham <Michael.Graham@texasbar.com>; Lauren Baisdon <Lauren.Baisdon@texasbar.com>; Jenny Hodgkins <Jenny.Hodgkins@texasbar.com>; Matthew Greer <Matthew.Greer@texasbar.com>
Subject: Re: BODA # 67842 Lauren Ashley Harris

BODA et al,

Please see the comporting Appellant's Brief and Appendix attached hereto.

Lauren A. Harris

On Thu, Jul 3, 2025 at 11:12 PM TXBODA Filing <filing@txboda.org> wrote:

Counsel,

Please see the attached Order issued by the Board of Disciplinary Appeals.

Matthew J. Greer
Deputy Director / Counsel
The Board of Disciplinary Appeals
P.O. Box 12426
Austin, TX 78711
Phone: (512) 427.1578
Fax: (512) 427.4366
Matthew.Greer@TexasBar.com