

NO. 67843

BEFORE THE BOARD OF DISCIPLINARY APPEALS

APPOINTED BY
THE SUPREME COURT OF TEXAS

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



FILED
6/27/25

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

v.

COMMISSION FOR LAWYER DISCIPLINE,
APPELLEE.

*On Appeal from Cause No. 202000647 [North]
Grievance Committee, District 14
Evidentiary Panel 14-2 of the State Bar of Texas*

**APPELLANT'S MOTION FOR LEAVE TO FILE OUT-OF-TIME BRIEF,
EXCEED WORD LIMIT & APPELLANT'S TRAP 38.5(A)(4) NOTICE**

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PRO-SE APPELLANT

**APPELLANT’S MOTION FOR LEAVE TO FILE OUT-OF-TIME BRIEF, EXCEED
WORD LIMIT & APPELLANT’S NOTICE UNDER TRAP 38.5(A)(4)**

Pursuant to the Board of Disciplinary Appeals (“BODA”) Internal Procedure Rules (“IPR”) 1.05, 1.09(a), 4.05(d), (f)(1) and 4.09(b), and the Texas Rules of Appellate Procedure (“TRAP”) 9.4(i)(4), 10.1(a), 10.5, 38.3, 38.6(d), 38.8(a)(1) and 42.3(b), Appellant Lauren Ashley Harris files this her motion for leave to file her Brief before BODA out-of-time, and for same to exceed the word limit set forth under BODA IPR 4.05(d). Further, Appellant herein provides the requisite Notice under TRAP 38.5(a)(4) as to the inclusion of a transcription of the November **, 2019 electronically recorded proceedings relevant to the appellate issues or points on appeal in the Appendix to Appellant’s Brief attached hereto; in support of the foregoing, Appellant Lauren Ashley Harris will show BODA as follows:

PROCEDURAL BACKGROUND

1. Appellant is Lauren Ashley Harris; Appellee is The Commission for Lawyer Discipline.
2. Within its June 17, 2025 Order to Show Cause, BODA set a ten (10) day deadline for Appellant to file her Motion for Leave to file Appellant’s out-of-time Brief.

ARGUMENT & AUTHORITIES

1. Appellant provides reasonable explanation for her failure to file her Brief by the BODA deadline, and implors BODa to accept her out-of-time Brief; appellee is not significantly injured by the appellant’s failure to timely file a brief where Apellee was not opposed to the relief of extension requested by Appekllant’s former counsel. Appellant works (thankfully) full-time and has not been able/cannot devote the time and attention to tis Appeal as she once could (where unemployed and fully-devoted to same), and she recently is without counsel, and unable to afford new attorneys of record She has instead attempted to comply with the requirements, albeit

late, and seeks BODA's approval of the attached Brief for its review.

2. The Court has the authority under Texas Rule of Appellate Procedure 38.6(d) to extend the time to file a brief, and a Court of Appeals/BODA has the authority to allow a party to exceed the word limits under Texas Rule of Appellate Procedure 9.4(i)(4).

4. Pursuant to BODA's Order where Appellant's brief *was* due on April 29, 2025, and having not been timely filed by that date, BODA entered its Order to Show Cause on June 17, 2025, which directed Appellant to file this Motion for Leave to File the out-of-time Brief within ten (10) days of same, being this date, June 27, 2025.

5. Appellant needed additional time to file her brief as stated above, being good cause for BODA to grant Appellant leave to file her Brief out of time based on the billable hour-requirements of a full-time position of employment, and the loss of counsel, and the inability to afford new counsel of record.

6. The Court should allow Appellant to exceed the word limits for the *Appellant's Brief* by the difference of the approximate 40,000 *words* because the appellate record is extensive, this appeal has spanned years, and Appellant was unable to cut the issues down or out for BODA review abased on the extensive errors in the record. Further, BODA should allow Appellant to exceed the word limits for the Appellant' Brief because the case involves complex legal issues.

CONCLUSION & PRAYER

9. Appellant requests that the Court grant this Motion for Leave to File Appellant's Out-of-Time Brief, that BODA may consider the attached Brief in this cause and allow Appellant's Brief to exceed the word-count limitation. This request is not for delay but so that justice may be done. For these reasons, Appellant asks BODA to grant leave to file her out of

time Appellant's Brief, and grant her request to exceed the word-count limitation, where Appellant's Brief is attached hereto for BODA review.

Respectfully submitted,

/s/ **LAUREN A. HARRIS**

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CERTIFICATE OF SERVICE

This is to certify that the above and foregoing Motion of Appellant has been served on BODA and Michael Graham, appellate counsel for the CDC on this date, the 27th of June 2025, in accordance with the TRAP, BODA IPR, and the TRCP:

Office of the Chief Disciplinary Counsel

Michael Graham

Appellate Counsel

michael.graham@texasbar.com

/s/ *Lauren A. Harris*

Lauren A. Harris