



**BEFORE THE BOARD OF DISCIPLINARY APPEALS
APPOINTED BY THE SUPREME COURT OF TEXAS**

IN THE MATTER OF	§	
NEJLA KASSANDRA KEYFLI LANE,	§	TX CAUSE NO. 67623
STATE BAR CARD NO. 24095557	§	IL SUP. CT. NO. M.R.31402
	§	IL COMMISSION NO. 2019PR74
ATTORNEY RESPONSE AND OBJECTION	§	FEDERAL COURT NO. 18MC40

**ATTORNEY’S MOTION FOR SHORT CONTINUANCE FOR A HEARING
ON PETITION FOR RECIPROCAL DISCIPLINE**

Nejla Kassandra Keyfli Lane (“Respondent Lane”) was personally served with the First Amended Order to Show Cause on Petition for Reciprocal Discipline and Hearing Notice (“Notice”) from the Commission for Lawyer Discipline (“Petitioner”), pursuant to Texas Disciplinary Rules of Procedure Conduct “TDRPC” Part IX, on May 30, 2023. On June 28, 2023, Respondent Lane filed her answer and defenses pursuant Texas Rule of Disciplinary Procedure (“TRDP”) Rule 9.04, with the Board of Disciplinary Appeals (“BODA” or “Board”) to show cause why the imposition of identical discipline, to the extent practicable, in Texas by the BODA pursuant to TRDP Rule 9.02, would be unwarranted. Currently, a Hearing date is set for Friday, July 28, 2023, at 9:00 a.m. Respondent Lane herewith moves the Board of Disciplinary Appeals for a short continuance for the Hearing, and in support Respondent Lane states as follows:

FACTUAL BACKGROUND:

1. Respondent Lane would like to bring to Board’s attention the extenuating circumstances for your understanding and consideration in granting this motion for a short continuance.
2. On February 6, 2023, a catastrophic earthquake struck Respondent Lane’s birth city, Hatay/Antakya (“hometown”), Turkey. This earthquake¹ resulted in devastating losses for

¹ This earthquake in Antakya continued over days and weeks.

Respondent Lane, including the devastating loss of her entire family. Within a few hours after the disaster, Respondent Lane learnt that her entire family living in Turkey were lost in or was still under the rubble, including her two beloved sisters, among others. The news of this tragic event left Respondent Lane in complete psychological and mental shock, and she decided to immediately go to Turkey to assist her family.

3. On February 15, 2023, Respondent Lane flew to Turkey with an open-ended return ticket, with a possible return date of March 24, 2023. Her primary purpose was to support her family in their search for missing relatives, *provide financial assistance*, and offer emotional comfort and healing during this difficult time. The aftermath of the earthquake necessitated extended effort to locate and bury the deceased, and Respondent Lane's presence and support were crucial during these critical days, because most of her family was either lost or trapped under the rubble.
4. Additionally, on February 6, 2023, during the catastrophic events, Respondent Lane's 14-year-old nephew, who was lost "en route" to the hospital². Despite intensive searching and media coverage, he had not been located.
5. Respondent Lane's surviving relatives and younger brother were also injured in the earthquake. They joined forces with others in search and recovery operations, enduring the emotional burden of burying their loved ones in makeshift graves.
6. Respondent Lane's two (2) sisters, along with her other relatives, along with other relatives, were tragically buried with their torn clothes on their bodies. One sister was buried on top

² The destruction caused by the earthquake resulted in hospitals being rendered inoperable, and the injured and deceased were placed in tents outside the hospital premises.

of their father's grave, and the other sister and her son were laid to rest on top of their mother's grave.

7. The conditions of the cemeteries were horrific as the earthquake damaged the tombstones and graves of her parents and other relatives. After the burials and holy prayer ceremonies were completed for some those who were found³, surviving family members relocated to be with other relatives residing in different cities.
8. After spending a few weeks in Istanbul, Turkey, many roads leading to her hometown remained closed, further complicating the situation. Considering these circumstances, Respondent Lane made the difficult decision to change her return plane ticket to March 5, 2023, and returned to Houston, Texas, at midnight.
9. Upon her return, Respondent Lane experienced extreme exhaustion and trauma due to the extensive physical and emotional toll she had endured. Seeking medical attention, her doctors diagnosed her with Post-Traumatic Stress Disorder (PTSD).
10. Since Respondent Lane's return to Texas, the country conditions in her hometown have improved. The roads leading to her hometown are now passable, according to the news and available country report.
11. Respondent Lane recently received the devastating news that her nephew tragically passed away on the first day of the earthquake, February 6, 2023. He was buried in a grave marked with the number 59.
12. Respondent Lane and her family made appropriate burial arrangements to ensure that the grave of their nephew, along with her other close relatives, is properly marked and honored.

³ The search for their 14-year-old nephew was still ongoing and her family made every possible effort to locate her nephew, including but limited to utilizing media channels to spread awareness.

This responsibility weighs heavily on them as they seek closure and a sense of peace during this difficult time.

13. Subsequently, Respondent Lane made arrangements with surviving family members to go to their hometown and restore the graves and order new tombstones for her family. This duty is deeply rooted in her cultural and familial tradition, and it carries immense importance and significance for the Respondent Lane. Fulfilling these obligations is not only a personal desire but also a way for her to honor her family's memory and preserve their legacy.
14. On Sunday, April 30, 2023, Respondent Lane booked a flight to Turkey, scheduled to depart from Austin, Texas on July 5, 2023; and her planned return to Austin, Texas is on July 27, 2023 at 3:55 p.m., provided there are no unexpected delays or issues during travel. This leaves only one day, less than 18 hours, between her arrival and the current hearing date. (*See* travel confirmation).
15. When Respondent Lane was personally served the notice for the Hearing, she had already made travel arrangements to her hometown in Turkey. At that time, she did not anticipate a hearing conflicting with her pre-arranged travel plans.
16. Respondent Lane asserts though she is scheduled to return on July 27, 2023, however, travel arrangements can be subject to unforeseen circumstances beyond our control, such as flight delays, cancellations, or other travel disruptions.
17. Respondent Lane's pre-arranged trip to Turkey coupled with the limited time available between her return and the hearing date, makes it impractical for her to be physically present and adequately prepare for the current Hearing.



For any changes with your flight, date,
route or names call us at [1-646-738-4933](tel:1-646-738-4933)
or [Click here to chat 24/7](#)

Booking Confirmation

CheapOair Booking: 80386207 | nXXXa@lanekeyfli.com | Booked on Sun, Apr 30, 2023 | 2484 points | Tier: Silver



Please continuously check all **COVID-19 related restrictions** directly with airlines prior to travel as they may change. [Learn more](#)



Please check your terminal and gate information with the airline directly at least 24 hours before departure.

Flight Details

Departing Flight

Make Changes



British Airways

Flight 190

Aircraft: 351

AIRBUS A351 313-359 STD SEATS

Nonstop | Coach - **STANDARD ECONOMY**

[Baggage Fees](#) | [Visa & Passport Info](#)

[Terminal & Gate Information](#)

Wed, Jul 05, 2023

Austin Bergstrom, Texas

AUS - 6:10 pm

London Heathrow, United Kingdom

LHR - 9:30 am

Thu, Jul 06, 2023

Travel Time:

17h 10m

Airline Confirmation:

MBGNEZ

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Layover Time (LHR) 3h 40m



British Airways

Flight 688

Aircraft: 32N

AIRBUS A320NEO 165 STD SEATS

Nonstop | Coach - **STANDARD ECONOMY**

[Baggage Fees](#) | [Visa & Passport Info](#)

[Terminal & Gate Information](#)

Thu, Jul 06, 2023

London Heathrow, United Kingdom

LHR - 1:10 pm

ISTANBUL AIRPORT, Turkey

IST - 7:20 pm

Thu, Jul 06, 2023

Airline Confirmation:

MBGNEZ

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Return Flight

 [Make Changes](#)



British Airways
Flight 675
Aircraft: 32N

AIRBUS A320NEO 165 STD SEATS

Nonstop | Coach - **STANDARD ECONOMY**
[Baggage Fees](#) | [Visa & Passport Info](#)
[Terminal & Gate Information](#)

Thu, Jul 27, 2023

ISTANBUL AIRPORT, Turkey

IST - 8:00 am

London Heathrow, United Kingdom

LHR - 10:10 am

Thu, Jul 27, 2023

Travel Time:
15h 55m

Airline Confirmation:
MBGNEZ

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Layover Time (LHR) 1h 40m



British Airways
Flight 191
Aircraft: 351

AIRBUS A351 313-359 STD SEATS

Nonstop | Coach - **STANDARD ECONOMY**
[Baggage Fees](#) | [Visa & Passport Info](#)
[Terminal & Gate Information](#)

Thu, Jul 27, 2023

London Heathrow, United Kingdom

LHR - 11:50 am

Austin Bergstrom, Texas

AUS - 3:55 pm

Thu, Jul 27, 2023

Airline Confirmation:
MBGNEZ

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Check airline [Fare Rules](#). Most airlines charge baggage fees, check the [Baggage Fees](#) for complete details.

Traveler Information

	E-Ticket Number	First Name	Middle Name	Last Name	Requests	Gender
1	1252158621829	Nejla	K	Lane		Female

Disclaimer: Not all flights offer free meals. Any specific request you may have will be sent to the airline(s). Please contact your airline(s) directly, prior to your departure date, to confirm what meal options may be available and if your other requests can be fulfilled.

Billing Details (USD)

Flights and Add-ons

CardHolder: Nejla K Lane

DATE	PRODUCT	DESCRIPTION	CARD NUMBER	AMOUNT
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