

No. 68164



FILED

Jan 18 2024

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

PEJMAN MAADANI,
STATE BAR OF TEXAS CARD NO. 24052152,
APPELLANT

V.

COMMISSION FOR LAWYER DISCIPLINE,
APPELLEE

**APPELLEE'S CORRECTED OPPOSED MOTION
FOR EXTENSION OF TIME TO FILE BRIEF**

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TO THE HONORABLE BOARD OF DISCIPLINARY APPEALS:

Appellee, the Commission for Lawyer Discipline, a committee of the State Bar of Texas, asks the Court, under authority of Rule 1.09, Supreme Court of Texas Board of Disciplinary Appeals Internal Procedural Rules, for an extension of time to file Appellee's brief.

I.

On August 14, 2023, an Evidentiary Panel of the State Bar District No. 4 Grievance Committee entered a Judgment of Active Suspension against Appellant in *Commission for Lawyer Discipline v. Pejman Maadani*, No. 202102105.¹

II.

Appellant filed a notice of appeal on August 14, 2023. The clerk's record was filed on November 22, 2023. The reporter's records were filed on November 17, 2023. Appellant's brief was filed on December 20, 2023.

III.

This is Appellee's only request for an extension of time to file its brief. Appellee's brief was originally due to be filed on January 19, 2024. Appellee requests a 30-day extension of time to prepare and file its brief, to and including February 20, 2024 (February 19th is President's Day, a state holiday). Appellee's counsel, the undersigned, needs additional time to file the brief due to a heavy briefing and oral argument schedule, including the following:

- No. 23-0684, *Annette R. Loyd v. Commission for Lawyer Discipline*, before the Supreme Court of Texas; Appellee's Brief filed January 12, 2024.
- No. 14-23-00646-CV, *In the Matter of Kennitra M. Foote*, before the Fourteenth Court of Appeals; Appellee's Brief due January 29, 2024.

¹ In the initial motion for extension of time to file Appellee's Brief, the undersigned inadvertently titled the suspension at issue in this case as "Partially Probated." This corrected motion is filed to address that error. *See* CR 316-320.

- No. 05-23-00497-CV, *Commission for Lawyer Discipline v. Sidney Powell*, before the Fifth Court of Appeals; Oral Argument set for February 7, 2024.

This motion is not due to sloth or neglect and not made for the purpose of delay, but to allow counsel to thoroughly review and brief the issues pending before the Board. Appellee's counsel has conferred with Appellant, who is representing himself Pro Se, regarding this request, and Appellant has indicated he is opposed to this Motion.

IV.

For these reasons, Appellee prays that the Board grant an extension of time to file Appellee's brief in this cause to **February 20, 2024**.

RESPECTFULLY SUBMITTED,

SEANA WILLING
CHIEF DISCIPLINARY COUNSEL

ROYCE LEMOINE
DEPUTY COUNSEL FOR ADMINISTRATION/
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COMMISSION FOR LAWYER DISCIPLINE

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Appellant on January 17, 2024, regarding the requested extension. Appellant indicated he is opposed to the request.



MICHAEL G. GRAHAM
APPELLATE COUNSEL
STATE BAR OF TEXAS

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing Appellee's Corrected Opposed Motion for Extension of Time to File Brief has been served on Appellant via electronic mail to pj@attorneymaadani.com on the 18th day of January 2024.



MICHAEL G. GRAHAM
APPELLATE COUNSEL
STATE BAR OF TEXAS