



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

**MOTION TO CONSOLIDATE CASES FOR BRIEFING AND HEARING**

- The misconduct for which Respondents were disciplined in the other jurisdiction does not constitute Professional Misconduct in this state (Rule 9.04(E)).

- The misconduct established in the other jurisdiction warrants substantially different discipline in this state (Rule 9.04(D)).
- The imposition by the Board of Disciplinary Appeals of discipline identical, to the extent practicable, with that imposed by the other jurisdiction would result in grave injustice (Rule 9.04(C)).

Respondents anticipate filing a substantive brief supporting their defenses with multiple exhibits. Respondents also anticipate putting on evidence at the hearing on this matter. Respondents believe it would be more convenient for the parties and the Board, and that it would promote efficiency, to submit a consolidated brief and one set of exhibits in both cases and to conduct the hearing on both cases at the same time.

The undersigned has conferred with counsel for the Commission, Amanda Kates, and Ms. Kates has indicated that the Commission is opposed to Respondents' request.

Respondents therefore respectfully request that the Board grant their respective motions and order that the Nesbitt Case and the Webster Case be consolidated for the purposes of briefing and hearing.

Respectfully submitted,

/s/ Kelli M. Hinson

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing pleading has been served via email on Amanda M. Kates, Assistant Disciplinary Counsel, Office of the Chief Disciplinary Counsel, on this 20<sup>th</sup> day of December, 2024.

/s/ Kelli M. Hinson

**KELLI M. HINSON**