



FILED

Mar 28 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

IN THE MATTER OF
KENNETH MICHAEL PLAISANCE,
STATE BAR CARD NO. 24045166

§
§
§

CAUSE NO. 69894

MOTION FOR CONTINUANCE AND PROPOSED BRIEFING SCHEDULE

COMES NOW, Petitioner, the Commission for Lawyer Discipline ("CFLD"), and files this Motion for Continuance and Proposed Briefing Schedule.

INTRODUCTION

1. Petitioner is the CFLD, a committee of the State Bar of Texas.
2. Respondent is Kenneth Michael Plaisance, State Bar No. 24045166.
3. Petitioner filed its Original Petition for Reciprocal Discipline on August 13, 2024.
4. Thereafter, Petitioner attempted to serve Respondent at his address listed with State Bar of Texas Membership, however all service attempts were unsuccessful.
5. Petitioner filed its First Amended Petition for Reciprocal Discipline on November 5, 2024.
6. Thereafter, Petitioner attempted to serve Respondent at his address listed with State Bar of Texas Membership, however all service attempts were unsuccessful.
7. Petitioner filed its Second Amended Petition for Reciprocal Discipline on February 20, 2025.
8. Respondent was served with the Second Amended Petition via certified mail on March 10, 2025.
9. Proof of receipt has been on file with this Board since March 20, 2025.
10. On March 19, 2025, Respondent filed a pleading entitled Made Motion to Dismiss.
11. On March 21, 2025, Respondent filed an untitled document containing "Cases Involving

Texas Disciplinary Counsel and Online Defamation of Attorneys,” and also a Motion to Dismiss the Original and First Amended Petition for Reciprocal Discipline.

12. On March 25, 2025, Petitioner received Respondent’s Motion for Summary Judgment with attached exhibits.
13. This matter is currently set for hearing to occur on April 25, 2025.
14. On March 25, 2025, Petitioner reached out to Respondent via email asking if Respondent would be opposed to a continuance and a briefing deadline. Petitioner also instructed Respondent that he would need to file his Motion for Summary Judgment with this Board.
15. To date, Respondent has not responded to Petitioner’s email regarding this motion. Accordingly, Petitioner files this motion as opposed.
16. Petitioner now requests a continuance in order to allow for Petitioner to respond to the current motions to dismiss and motion for summary judgment, and to allow for further briefing between the parties. Petitioner further requests that this matter be reset for the July 2025, BODA date. Petitioner proposes the following proposed briefing schedule.
 - a. Petitioner's Response to any dispositive pleadings filed by Respondent prior to the filing of this motion is due May 15, 2025.
 - b. Respondent's Reply is due June 2, 2025.
 - c. Final deadline for briefing, responses, and replies by Petitioner is June 16, 2025.
 - d. Final deadline for briefing, responses, and replies and Responses by Respondent due July 1, 2025.

PRAYER

For these reasons, Petitioner asks the Board to GRANT the motion for continuance.

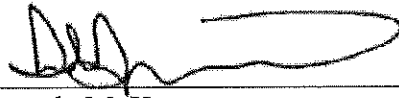
The continuance is not sought for delay only, but that justice may be done.

Respectfully submitted,

Respectfully submitted,

Seana Willing
Chief Disciplinary Counsel

Amanda M. Kates
Assistant Disciplinary Counsel
Office of the Chief Disciplinary Counsel
State Bar of Texas
P.O. Box 12487
Austin, Texas 78711
Telephone: 512.427.1350
Telecopier: 512.427.4253
Email: amanda.kates@texasbar.com



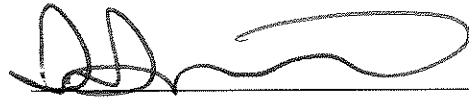
Amanda M. Kates
Bar Card No. 24075987

VERIFICATION

STATE OF TEXAS §
COUNTY OF TRAVIS §

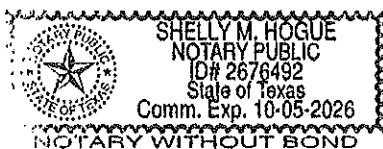
Before me, the undersigned notary, on this day personally appeared Amanda M. Kates, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

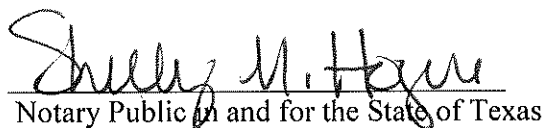
“My name is Amanda M. Kates. I am capable of making this verification. I have read Petitioner’s Unopposed Motion for Continuance. The facts stated in it are within my personal knowledge and are true and correct.”



Amanda M. Kates

Sworn to and subscribed before me on 27th day of March, 2025.




Notary Public in and for the State of Texas

CERTIFICATE OF SERVICE

I certify that a copy of this Motion for Continuance and Proposed Briefing Schedule was served on Kenneth M. Plaisance, via email at kplaws88@gmail.com on this 28th day of March 2025:



Amanda M. Kates