

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**THOMAS L. TAYLOR, III  
In his capacity as Court-Appointed  
temporary receiver for Breitling  
Energy Corporation, *et al.*,**

**Plaintiff,**

**vs.**

**SCHEEF & STONE, LLP, ROGER  
CRABB, AND MITCH LITTLE**

**Defendants.**

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**CIV. ACTION NO. 3:19-cv-02602-B**

**CASTILLO SNYDER P.C.’S MOTION FOR LEAVE TO PROCEED  
WITHOUT LOCAL COUNSEL**

Pursuant to Local Rule 83.10(a), of the Local Rules of the Northern District of Texas, Movants Castillo Snyder P.C., Edward C. Snyder and Jesse R. Castillo (collectively “Castillo Snyder”) respectfully request leave of Court to participate in this matter without local counsel and in support hereof would show the Court as follows:

Castillo Snyder has been retained to serve as litigation counsel for the Receiver Thomas L. Taylor in this matter. Edward C. Snyder and Jesse R. Castillo are licensed in the Northern District of Texas and have appeared in numerous cases in the Northern District of Texas since 1997 including the matters described on the attached Exhibit “1”. Jesse R. Castillo was admitted to the Northern District of Texas on July 23, 1997. Edward C. Snyder was admitted to the Northern District of Texas on February 14, 2003. Castillo Snyder’s offices are in San Antonio, Texas and Messrs. Castillo and Snyder can readily appear at any hearing or setting in

this Court. Castillo Snyder has read and is very familiar with the Local Rules of the Northern District of Texas.

Wherefore, for the foregoing reasons, Castillo Snyder respectfully requests that the Court grant this Motion and allow Castillo Snyder to appear before this Court without local counsel.

Dated: November 1, 2019

Respectfully submitted,

**CASTILLO SNYDER, P.C.**  
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*/s/ Edward C. Snyder*

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***ATTORNEYS FOR THOMAS L.  
TAYLOR, III***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on this 1<sup>st</sup> day of November, 2019 on all counsel of record via CM/ECF, and/or email, pursuant to the Federal Rules of Procedure 5(b)(2).

*/s/ Edward C. Snyder*  
Edward C. Snyder

## Exhibit 1

### **EDWARD C. SNYDER AND JESSE R. CASTILLO'S LIST OF RECENT CASES IN THE NORTHERN DISTRICT OF TEXAS**

Civil Action No. 3:14-cv-3283-B; *Vulcan Capital Corporation vs. Miller Energy Resources, Inc. And Plains Capital Bank*;

Civil Action No. 3:12-cv-00495-N; *Janvey vs. Adams & Reese LLP, Breazeale, Sachse & Wilson, LLP, et al*;

Civil Action No. 3:10-cv-2584-N; *Janvey et al. vs. Alvarado*;

Civil Action No. 3:10-cv-0527-N; *Janvey vs. Ben Barnes and Ben Barnes Group, LP*;

Civil Action No. 3:11-cv-01115-N; *Wilkinson and Reed vs. BDO USA LLP, BDO Global Coordination BV, and Brussels Worldwide Services BVBA*;

Civil Action No. 3:10-cv-2583; *Janvey vs. Bogar et al.*;

Civil Action No. 3:11-CV-00301-N; *Janvey, et al vs. Brown*;

Civil Action No. 3:11-cv-0299; *Janvey et al. vs. Castaneda et al.*;

Civil Action No. 3:11-cv-01025-N; *Official Stanford Investors Committee vs. Chamberlain, Hrdlicka, White, Williams & Martin, LLP*;

Civil Action No. 3-11-cv-00738; *Janvey et al vs. Chung Design, LLC*;

Civil Action No. 3:10-cv-2564-N; *Janvey et al. vs. Harry Earl Failing and Harry Earl Failing, PC*;

Civil Action No. 3:09-cv-02199; *Lynne Turk, et al vs. Pershing, LLC*;

Civil Action No. 3:09-CV-0298-N; *Securities & Exchange Commission vs. Stanford International Bank, Ltd., Stanford Group Company, Stanford Capital Management LLC, et al.*;

Civil Action No. 3:13-cv-00477; *Ralph S. Janvey, et al vs. Proskauer Rose, LLP., et al.*;

Civil Action No. 3:09-cv-01600-N-BG, *Samuel Troice, et al. vs. Proskauer Rose, LLP, et al.*;

Civil Action No. 3:16-cv-001152-N; *Sandra Dorrell and Phillip Wilinkinson, et al. vs. Proskauer Rose and Thomas Sjoblom*;

Civil Action No. 3:09-cv-02151-N; *Janvey vs. Reeves*;

Civil Action No. 3:11-cv-00297; *Janvey vs. Peter Romero*;

Civil Action No. 3:10-cv-2586; *Janvey et al. vs. Stinson et al.*;

Civil Action No. 3:11-cv-01895-N; *Janvey vs. Texas A&M University*;

Civil Action No. 3:13-cv-03980-D; *The Official Stanford Investors Committee et al vs. Willis of Colorado, Inc. et al.*;

Civil Action No. 3:09-cv-01274-L; *Samuel Troice, et al vs. Willis of Colorado, et al.*;

Civil Action No. 3:11-cv-158-M; *Janvey, et al vs. Miami Heat, et al.*;

Civil Action No. 3:11-cv-0770-L; *Janvey, et al vs. Rocketball, LTD, et al.*;

Civil Action No. 3:11-cv-329-N-BG; *Official Stanford Investors Committee, et al., vs. Breazeale, Sachse & Wilson, LLP, et al.*;

Civil Action No. 3:11-cv-00298-N-BL; *Official Stanford Investors Committee vs. Cort & Cort, et al.*;

Civil Action No. 3:12-cv-04641-N; *Janvey, et al. vs. Greenberg Traurig, LLP, et al.*;

Civil Action No. 3:09-cv-02384-N-BQ; *Rotstain and Official Stanford Investors Committee vs. Trustmark National Bank, et al.*;

Civil Action 4:04-cv-00603-Y, *Lydia Bart et al vs. Smith & Chambers, L.L.C. et al* (Fort Worth Division);

Civil Action No. 3:04-cv-2238-BD; *Dr. Roberto Melo and Jaime de la Garza vs. Gardere Wynne Sewell LLP, et al.*;

Civil Action No. 3:98-cv-2792-M; *SEC vs. Sharp Capital, Inc. et al., and Emerging Markets Capital Advisors, LTD*;

Civil Action No. 3:03-cv-15-M; *Janvey vs. Thompson & Knight, LLP.*