

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THOMAS L. TAYLOR III, solely in his	§	
capacity as Court-appointed temporary	§	
receiver for Breitling Energy Corporation,	§	
<i>et al.</i> ,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:20-cv-00393-D
	§	
REYMOND TREVINO, EAGLE RIO	§	
ENERGY COMPANIES, INC., DEREK	§	
TAYLOR, ALDEN ADAMS, LLC,	§	
NATHAN MADU, and OKOTO OKPO,	§	
Defendants.	§	

**PLAINTIFF’S UNOPPOSED 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 The Taylor Law Offices, P.C., Thomas L. Taylor III, Goforth Law, PLLC and Andrew M. Goforth (collectively “Movants”), counsel for Plaintiff Receiver, respectfully request leave of Court to participate in this matter without local counsel. The undersigned has conferred with counsel for the Defendants Raymond Trevino, Eagle Rio Energy Companies, Inc., Derek Taylor, Alden Adams, LLC, and Okoto Okpo, who are not opposed to the relief sought herein.

Messrs. Taylor and Goforth have been licensed in the Northern District of Texas since 2006 and 2011, respectively, and have appeared in numerous cases in the Northern District of Texas. Mr. Taylor currently serves as the court-appointed equity receiver in *SEC v. Faulkner, et al.*, Case No. 3:16-cv-01735-D. Mr. Goforth serves as receiver’s counsel in that action. Movants’ offices are in Houston, Texas and Messrs. Taylor and Goforth can readily appear at any hearing or

setting in this Court, whether in Dallas or via teleconferencing means due to the COVID-19 pandemic. Movants have read and are familiar with the Local Rules of the Northern District of Texas.

For the foregoing reasons, Movants respectfully request that the Court grant this Motion and allow Movants to appear before this Court without local counsel.

Dated: September 21, 2020

Respectfully submitted,

THE TAYLOR LAW OFFICES, PC

Thomas L. Taylor III, Receiver
Texas Bar: 19733700
taylor@taylorlaw.com

245 West 18th Street
Houston, Texas 77008
Tel: 713.626.5300
Fax: 713.402.6154

GOFORTH LAW, PLLC

By: /s/ Andrew M. Goforth

Andrew M. Goforth
Texas State Bar: 24076405
andrew@goforth.law

7614 Fairdale Lane
Houston, Texas 77063
Tel: (713) 464-2263
Fax: (713) 583-1762

COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Defendants Reymond Trevino, Eagle Rio Energy Companies, Inc., Derek Taylor, Alden Adams, LLC, and Okoto Okpo with respect this motion, and they are not opposed to the relief sought herein.

/s/ Andrew M. Goforth

Andrew M. Goforth

CERTIFICATE OF SERVICE

I certify that on September 21, 2020 I filed the foregoing document through the Court's CM/ECF filing system, and emailed the foregoing document to lilmadu@hotmail.com, which satisfies service requirements under FED. R. CIV. P. 5(b).

/s/ Andrew M. Goforth

Andrew M. Goforth

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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

Plaintiff,

v.

REYMOND TREVINO, EAGLE RIO ENERGY COMPANIES, INC., DEREK TAYLOR, ALDEN ADAMS, LLC, NATHAN MADU, and OKOTO OKPO,

Defendants.

§
§
§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 3:20-cv-00393-D

**ORDER GRANTING UNOPPOSED MOTION FOR LEAVE TO PROCEED
WITHOUT LOCAL COUNSEL**

On this date came on to be considered Movants The Taylor Law Offices, P.C., Thomas L. Taylor III, Goforth Law, PLLC and Andrew M. Goforth’s (collectively “Movants”) Motion For Leave to Proceed Without Local Counsel filed September 21, 2020 (the “Motion”). After considering the Motion, the Court is of the opinion that the Motion should be granted.

IT IS HEREBY ORDERED that Movants’ Motion is **GRANTED** and The Taylor Law Offices, P.C., Thomas L. Taylor III, Goforth Law, PLLC and Andrew M. Goforth may appear as counsel for Plaintiff in this matter without local counsel.

Dated: _____, 2020.

SIDNEY A. FITZWATER
SENIOR JUDGE