

**NO. 24-0881**

**IN THE SUPREME COURT OF TEXAS**

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**In the Interest of K.N., K.L., K.L., and K.L., Children**

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*On Petition for Review from the 7<sup>th</sup> Court of Appeals, Amarillo, Texas  
Cause No. 07-24-00146-CV*

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**PETITIONER'S REPLY BRIEF**

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**PETITIONER REQUESTS ORAL ARGUMENT**

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**PETITIONER'S REPLY BRIEF**

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TO THE HONORABLE JUSTICES OF THE SUPREME COURT OF TEXAS:

**SUMMARY OF ARGUMENT**

The trial court lacked subject matter jurisdiction to order the termination. The refusal of Petitioner to cooperate with the Department under the circumstances presented by this case does not constitute endangering conduct to justify termination of parental right or the appointment of the Department as a managing conservator.

**ARGUMENT PRESENTED**

**Reply to Response Point I: Subject matter jurisdiction is implicated within the UCCJEA**

**Reply to Response Point II: The trial court did not have subject matter jurisdiction and the judgment should be found void.**

**Reply to Response Point III: There was legally insufficient evidence to terminate parental rights under D and E, as well as legally insufficient evidence to support the appointment of the Department as the managing conservator of the three younger children.**

**Reply to Response Point IV: Failure to address N and O basis for termination**

### **ARGUMENT**

**A. Reply to Response Point I: Subject matter jurisdiction is implicated within the UCCJEA**

With regard to the jurisdictional arguments raised by this action, the threshold inquiry is whether the UCCJEA (herein after referred to as the “Act”) governs subject matter jurisdiction in a custody dispute. It is true, Justice Lehrmann’s concurring opinion in *IN RE D.S.*, 602 S.W.3d 504 (Tex 2020) raised the issue, questioning if the Act had anything to do with subject matter jurisdiction. As stated in the majority opinion “The matter is not settled”. Texas courts citing the issue in cases since *D.S.* reach the same conclusion.

Petitioner argues that a plain reading of the statute and its history make it clear the Act is intended to determine subject matter jurisdiction. Obviously, the Act uses the term jurisdiction in its title. Texas Family Code section 152.201 states that its

provisions are the exclusive basis for establishing jurisdiction to make a child custody determination in this state. Thus, this state either has jurisdiction under the Act and can make a custody determination or if it does not have jurisdiction under the Act, it may not. This is a hallmark of subject matter jurisdiction.

On November 1 2024, the Joint Editorial Board for Uniform Family Law issued a commentary on UCCJEA Subject Matter Jurisdiction & Hague Abduction Convention. In this commentary, the drafters of the Act make it clear that the intent was for the Act to govern subject matter jurisdiction.

Child Custody Jurisdiction is Subject Matter Jurisdiction  
Subject matter jurisdiction, including over a child custody dispute, either exists or does not at the time the petition is filed in a court. “The UCCJEA is the exclusive method of determining subject matter jurisdiction in custody cases.”<sup>3</sup> Most courts have found that subject matter jurisdiction cannot be created by the consent, assent, or presence of the parties, nor by their waiver. <sup>4</sup> Subject matter jurisdiction cannot be conferred by estoppel.<sup>5</sup> If the court lacks subject matter jurisdiction to make an initial child custody determination or to modify an existing determination, the judgment must not be issued, and, if issued, must be vacated.<sup>6</sup> A defect in subject matter jurisdiction can be raised at any time by any party or by the court.<sup>7</sup> Therefore, it is well settled in case law throughout the United States that the jurisdiction to establish or modify a child custody determination either exists by statute, or does not. The parties cannot confer such jurisdiction through agreement.

The commentators cite to this Court for support in a footnote for the proposition that subject matter jurisdiction is governed by the act:

Subject-matter jurisdiction cannot be waived, and can be raised at any time. *Univ. of Tex. Sw. Med. Ctr. at Dallas v. Loutzenhiser*, 140 S.W.3d 351, 358 (Tex. 2004). Because the trial court lacked subject-matter jurisdiction to enter the custody provisions in the 1999 divorce decree, it properly refused to enforce that portion of the decree here.

Accordingly, we grant Tarquis's petition for review, and without hearing oral argument, TEX. R. APP. P. 59.1, we reverse the court of appeals' judgment and render judgment dismissing the enforcement actions for lack of subject-matter jurisdiction.

*Alfonso v Skadden*, 251 S.W.3d 52 (Tex. 2008).

Subject matter jurisdiction is thus the tool utilized by the Act to determine, in a mobile society and one in which interstate custody disputes have become more common, when a court can act and when it cannot.

The Honorable Justice Lehrmann starts her analysis by analogizing a sovereign immunity defense with subject matter jurisdiction. In *Engleman Irrigation Dist. V. Shields Bros.*, 514 S.W.3d 746 (Tex. 2017), the Court refused to equate a defense of sovereign immunity with subject matter jurisdiction, denying a collateral attack on a judgment. While immunity is often raised in a plea to jurisdiction, that is the ability of the plaintiff to even bring the suit, immunity from liability must be raised as an affirmative defense. *Rosenburg Dev. Corp. v. Imperial Performing Arts Inc.*, 571

S.W.3d 738 (Tex. 2019). It is reasonable to say that a governmental entity that had immunity available and did not raise the issue in the underlying action should not be able to later attack a judgment on that basis. However, as cited by the Court, there is reluctance to conclude that a provision is jurisdictional absent clear legislative intent to that effect *City of Desoto v. White*, 288 S.W. 3d 389 (Tex. 2009). In the present case, the plain language of the statute provides that the statute is jurisdictional and is intended to address subject matter jurisdiction.

The Honorable Justice Lehrmann comments that the Act provides that a court can decline jurisdiction and the agreement of the parties as to jurisdiction can be a factor in the analysis, both of which indicate that the Act is not talking about subject matter jurisdiction. It is true that subject matter jurisdiction, as cited by the authors of the Act, is something a court either has or it does not. The idea that the parties may agree on which court has jurisdiction is just a factor for a court to consider in deciding an inconvenient forum challenge. It is only a factor and is not determinative. It is not like a forum selection clause in a contract. Simply because the parties agree that a different court may have jurisdiction does not mean the court is bound by this agreement by the parties. It is not as if the parties can control which court hears the case by mere agreement, it is only a factor and is not determinative. Likewise, a court can decline jurisdiction under the Act. This does not negate the concept that a court

hearing a custody case does not have subject matter jurisdiction. A court, or a court in conference with a sister court, may decide it has jurisdiction under the Act, but under the dictates of the Act the court can decide the sister court should hear the case. This does not negate the concept that the court hearing the case must have subject matter jurisdiction. It is not that the court has “declined” (the term used by the Act) to exercise its jurisdiction.... what it has done is passed that jurisdiction on to another court. It is not that subject matter jurisdiction is being waived by a court, which it could not do and be true subject matter jurisdiction, Petitioner argues that it has essentially transferred that jurisdiction under the dictates of the Act.

The Honorable Justice Lehrmann states the import of the Act is to decide where an action may be brought but not who will hear the action. Petitioner argues that in deciding where the action is to be heard is tantamount to deciding who will hear the action. The Act does not provide that an action may be brought somewhere if that court does not have jurisdiction under the Act. Petitioner reads into the Justices’ comments that the Act is akin to an interstate venue statute. But the Act does not provide for the ability to transfer an action to another state. As stated in the commentary, the state in question either has authority to act or it does not, there is no transfer.

The underlying public policy for suggesting that the Act does not implicate subject matter jurisdiction is the need for finality of the judgment, particularly in cases involving custody of children.

Importantly, the principal justification for this Court’s general reluctance to view statutory requirements as jurisdictional—ensuring a judgment’s finality—is even more pronounced in child-custody cases. Indeed, one of the UCCJEA’s primary concerns is avoiding relitigation of custody judgments, which is often detrimental to the child. *Phillips v. Beaber*, 995 S.W.2d 655, 659 (Tex. 1999) (discussing the UCCJEA’s predecessor). Holding that noncompliance with the UCCJEA’s requirements deprives a court of subject matter jurisdiction over a custody dispute renders the court’s judgment vulnerable to collateral attack years later. And the complexity of making home-state determinations in an increasingly mobile world only magnifies this concern. *See ante* at 513. Such uncertainty harms children and parents alike. *See PNS Stores, Inc. v. Rivera*, 379 S.W.3d 267, 274 (Tex. 2012) (“While no system is infallible, endless litigation, in which nothing was ever finally determined, would be worse than the occasional miscarriage of justice.” (alteration and quotation omitted)).

*In Re D.S.*

These concerns for finality are not present in the current case. This case presents a direct attack on the jurisdiction of the trial court it is not a collateral attack brought years after a judgment of termination was final and the appellate process was not perused. The children in this case are not put at risk of perpetual limbo. Even without the jurisdictional argument, the children (and the Department and prospective adoptive parents, if any) would have to await the outcome of the appellate process

before they will know where they will live and with whom. Finality, or the lack of, it is not a concern in making a decision in this case.

In conclusion, the Act does implicate subject matter jurisdiction and this Honorable Court should so find.

**B. Reply to Response Point II: The trial court did not have subject matter jurisdiction and the judgment should be found void.**

Petitioner's position on the issue of jurisdiction, as briefly restated from her brief on the merits, is the trial court initiated an initial custody determination after the children and parents moved from Texas to Louisiana. The initial custody determination was based on a petition for emergency order of protection. The statute referenced in the order as a basis for jurisdiction was Tex. Fam. Code § 262.002. This statute provides that the suit may be filed "in a court with jurisdiction to hear the suit in the county where the child may be found". Because the children were not in Texas, the court did not have jurisdiction to enter the order. Petitioner takes the same position as to emergency jurisdiction under the Act, as stated in its brief on the merits. Based on the analysis in *Garza v. Harney*, 726 S.W.2d 198, 202–03 (Tex.App.–Amarillo 1987), Petitioner argues that the trial court could not regain home state status (acknowledging the Department takes the position that Texas was always the home state) by using law enforcement to forcibly return the children to Texas. Petitioner

argues this is using what is only supposed to be a temporary jurisdiction to require the children to return to Texas, where they remained until the final trial of the matter. At that point, the children had been in Texas for a sufficient period to identify Texas as the home state in the final order. Should the State be able to force children to return to Texas when there was no basis to exercise emergency jurisdiction in the first place, and then be able to claim it is the home state with jurisdiction to terminate parental rights? Petitioner argues it should not.

The Department responds that Texas was the home state under the Act for several reasons.

The Department argues that it was possible that the whole assertion that the family had moved to Louisiana was fabricated. Petitioner's testimony that the family had moved out of the state was uncontroverted. There was no testimony about it other than her testimony. Furthermore, the children were found in Louisiana and the mother arrested there based on warrants for her refusal to return the children to Texas.

The Department argues that the move out of state was in bad faith, i.e. to avoid the Texas court's jurisdiction. Petitioner argues the move was not in bad faith. At the time of the move, she retained full custody of the children, and there was only an order to participate in services. There was no order that she had to remain in the state. There was no order giving the Department custody of the children that she was fleeing

to avoid. As far as she knew, she was well within her rights to move her family to another state if she so chose.

The Department argues that the move to Louisiana was only a temporary absence and therefore does not defeat jurisdiction under the Act. Petitioner agrees that case law makes the parties subjective intent irrelevant under the Act as to whether the move was intended to be temporary or permanent. Nevertheless, there is no evidence the family left temporarily. This is not a situation where one parent was exercising summer visitation or the children were going to visit relatives out of state. Petitioner argues that the issue turns on the definition of “immediately” as used in the code. The Court will have to decide if “immediately” encompasses the eleven days the family had left prior to the filing of the initial custody proceeding. Petitioner argues it does not. Therefore, the Texas court lacked jurisdiction.

The Department argues since there was no home state at the time the initial custody action was filed and the parties had a significant connection with the state of Texas, therefore, Texas could exercise jurisdiction. It would be disingenuous to argue the parties did not have a significant connection with Texas. However, nowhere does the trial court provide that this is the basis for its jurisdiction. The initial custody action cited to was emergency jurisdiction. Petitioner has already argued the trial court did not have emergency jurisdiction. The children did not return to Texas until almost

four months after the filing of the initial custody determination. There is nothing in the record to indicate the children would have ever returned to Texas except for their removal by law enforcement. But for that action, it is a reasonable inference that the children would have remained in Louisiana until it had achieved home state jurisdiction. As argued in her brief on the merits, Louisiana had emergency jurisdiction. A suit could have been initiated in Louisiana under the Act. Then the Louisiana court contacts the Texas court and the significant contacts analysis is done and possibly a determination of significant contacts with Texas is determined. At that point there would have been compliance with the Act. The record does not indicate this ever happened. Without compliance with the Act, Petitioner argues that using emergency jurisdiction to bring the children back to Texas is not contemplated by the Act or case law. Therefore, the Texas court had no jurisdiction to make the initial custody determination.

Finally, the Department argues that Texas Family Code section 161.211 bars Petitioner's attack on jurisdiction. Petitioner admits the statute is problematic. It has been held to bar jurisdictional attacks. Petitioner responds with the following:

- a. Counsel cannot represent that he has read thoroughly all 138 cases that cite to the statute. But just a cursory review of at least half of these case demonstrates that it is used in cases involving affidavits of

relinquishment and collateral attacks on these affidavits. This case presents a direct attack on an involuntary termination.

- b. A plain reading the statute results in any direct attack on an involuntary termination must be dismissed after six months. This leads to the absurd result that if a direct appeal is not resolved in six months it must be dismissed. Regardless of the basis. This cannot be the result intended by the legislature.
- c. Long standing case authority and precedent from this Court holds that subject matter jurisdiction can be raised at any time during the appellate process. This is what Petitioner has done. There is no reason to abrogate this well-established case law when the issue is presented in a direct attack.

Based on the above, if the Act does implicate subject matter jurisdiction, the Texas court did not have such jurisdiction under the Act and the judgment should be declared void.

**C. Reply to Response Point III: There was legally insufficient evidence to terminate parental rights under D and E, as well as legally insufficient evidence to support the appointment of the Department as the managing conservator of the three younger children.**

Petitioner agrees with the Department that this Court does not review factual sufficiency issues. The Department attempts to cast the issues as a matter in which deference to the fact finder is required and the termination upheld. It does so by giving a laundry list of every allegation that was ever made against Petitioner to support this

position. The Department ignores that undisputed record that the alleged victim downplayed the severity of what was contained in the outcries. The alleged perpetrator told the same story as the alleged victim as to the challenged discipline. The Court of Appeals framed the case as one in which “discipline had gone too far.”

Petitioner’s response to these allegations are found in her brief on the merits. She argues she used traditional methods of discipline and did not “cross the line” at any point.

Petitioner argues that the Department’s own actions belie their position. If the children were being beaten, starved, and other allegations were believable after the Departments investigation, it would be a reasonable inference that they would have removed the children immediately to protect them from such heinous abuse. Instead, the children remained in the home for a period of six months with only an order to participate in services in place. It was clear that Petitioner was refusing to comply with this order from the very beginning of the case. Yet the children remained in her care. It was not until the family moved that a removal was initiated. The only thing that had changed at that time was Petitioners refusal to cooperate had lasted six months at that point. Petitioner argues the only reason for the filing of the termination and subsequent trial was because of her refusal to work services. This argument is outlined in detail in the brief on the merits.

The removal of the three youngest children makes the point as well. There were no allegations of maltreatment of these children. All the Department can say is they witnessed the alleged abuse and this was abuse in itself, justifying the conservatorship finding on these children.

Petitioner frames the question as whether a refusal to cooperate with the Department alone is sufficient to justify a finding of “endangering conduct” to justify a termination under D and E. Petitioner argues it is not.

What is the Department to do when a parent refuses to cooperate? Petitioner suggests there must be a threshold determination that significant abuse or neglect has occurred before a parent can face termination of parental rights. There should be more than traditional methods of discipline before the state can say “no corporal punishment, time outs can only be for a certain time period, the child has to be allowed to eat breakfast at school.” There should be more than concerns by estranged family members. There should certainly be more than concerns about what are traditionally parenting decisions before the Department can use a parties refusal to comply with the Departments edicts as basis to remove children, whether termination or otherwise.

**D. Reply to Response Point IV: Failure to address N and O basis for termination**

The Department asserts that N and O were not challenged and therefore still stand to uphold the termination. Petitioner disagrees.

N and O were addressed in the briefing in the Court of Appeals. The Court of Appeals chose not address these issues, holding there was sufficient evidence under D and E and thus they did not have to address N and O.

Petitioner did not address N and O because this Court traditionally does not consider issues that were briefed in, but not decided by, the courts of appeals. *See In re L.G.*, 596 S.W.3d 778, 780 n.3 (Tex 2020). *Delaney v. University of Houston*, 835 S.W.3d 56, 59 (Tex 2012).

If in the interest of judicial economy, if the Court decides it wants to look at these issues, the central argument applies to both grounds. O requires that the children be removed for abuse or neglect before O can be a basis for termination. Here, the argument is the children were removed for failure to comply with a service plan, not because of any abuse or neglect. O cannot provide a basis for termination under these circumstances.

N provides for termination upon constructive abandonment. Here, the record made clear that Petitioner had her visitation and access to the children suspended because she was not working services. Furthermore, there was no evidence (at least

form Petitioner's point of view) that the parent failed to demonstrate they could provide a safe environment. N cannot provide a basis for termination.

### **CONCLUSION AND PRAYER**

Petitioner requests the order of termination of parental rights and the appointment of the Department as the conservator of the children be reversed and rendered because the trial court lacked subject matter jurisdiction or failed to comply with the both the Texas Family Code and the Act in exercising jurisdiction. Petitioner requests the order of termination and appointment of the Department be reversed and rendered because the refusal to cooperate with the Department does not constitute endangering conduct or otherwise justify the orders based on D and E. Petitioner requests that either the issues under N and O be remanded to the Court of Appeals or in the interest of judicial economy and final resolution for the children involved, these basis for termination also be found to not support termination or appointment of the Department as a conservator. Petitioner seeks and order from the Court that the children be returned to her care and control as soon as possible.

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### **CERTIFICATE OF COMPLIANCE**

Pursuant to TEX. R. APP. P. 9.4, I hereby certify that this Petitioner's Reply Brief contains 3737 words. This is a computer-generated document and in making this certificate of compliance, I am relying on the word count provided by the software used to prepare the document. Petitioner has filed a motion to exceed word count with this brief

/s/ Michael J. Sharpee  
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### **CERTIFICATE OF SERVICE**

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on, July 7, 2025, as follows:

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