

No. 20-0127

In the Supreme Court of Texas

**IN RE DIOCESE OF LUBBOCK,
*Relator.***

On Petition for Writ of Mandamus from the 237th Judicial District Court, Lubbock County Courthouse, the Honorable Les Hatch, Cause No. 2019-534,677, and the Seventh District Court of Appeals at Amarillo, No. 07-19-00307-CV

REPLY IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS

Eric C. Rassbach
Texas Bar No. 24013375
Lead Counsel
erassbach@becketlaw.org

Eric S. Baxter
Non-resident attorney motion to
be filed

ebaxter@becketlaw.org

William J. Haun
Non-resident attorney motion to
be filed

whaun@becketlaw.org
The Becket Fund
for Religious Liberty
1200 New Hampshire Avenue
NW, Suite 700
Washington, D.C. 20036
Telephone: (202) 955-0095

Thomas C. Riney
Texas Bar No. 16935100
triney@rineymayfield.com
Kerri L. Stampes
Texas Bar No. 24032170
Riney & Mayfield, LLP
320 South Polk Street, Suite 600
Amarillo, Texas 79101
Telephone: (806) 468-3200
kstampes@rineymayfield.com

Vic Wanjura
Texas Bar No. 24050159
Hund, Krier, Wilkerson
& Wright, P.C.
3217 34th Street
Lubbock, Texas 79410
Telephone: (806) 783-8700
vwanjura@hkwwlaw.com

*Attorneys for Relator
Diocese of Lubbock
Oral Argument Requested*

IDENTITY OF PARTIES AND COUNSEL

Diocese of Lubbock, Relator	<p>THE BECKET FUND FOR RELIGIOUS LIBERTY 1200 New Hampshire Avenue NW, Suite 700 Washington, D.C. 20036 Telephone: (202) 955-0095 erassbach@becketlaw.org</p> <p>Eric C. Rassbach Texas Bar No. 24013375 erassbach@becketlaw.org</p> <p>Eric S. Baxter Non-resident attorney ebaxter@becketlaw.org</p> <p>William J. Haun Non-resident attorney whaun@becketlaw.org</p> <p>RINEY & MAYFIELD, LLP 320 South Polk Street, Suite 600 Amarillo, Texas 79101 Telephone: (806) 468-3200 Facsimile: (806) 376-4509</p> <p>Thomas C. Riney Texas Bar No. 16935100 triney@rineymayfield.com</p> <p>Kerri L. Stampes Texas Bar No. 24032170 kstampes@rineymayfield.com</p>
-----------------------------	--

Alex L. Yarbrough
Texas Bar No. 24079615
ayarbrough@rineymayfield.com

HUND, KRIER, WILKERSON &
WRIGHT, P.C.
3217 34th Street
Lubbock, Texas 79410
Telephone: (806) 783-8700

Vic Wanjura
Texas Bar No. 24050159
vwanjura@hkwwlaw.com

<p>Jesus Guerrero, Real Party in Interest</p>	<p>OLGUIN LAW FIRM Nick Olguin 808 ½ Main Street Lubbock, Texas 79401 Telephone: (806) 741-1111 Facsimile: (806) 741-1115 Texas Bar No. 24065083 nick@olguinandprice.com</p> <p>SIMS, PRICE & PRICE, PLLC Ryan E. Price Non-resident attorney 1517 Main Woodward, Oklahoma 73801 Telephone: (580) 256-9900 Facsimile: (580) 256-9902 ryan@woodwardattorney.com</p>
<p>Honorable Les Hatch, Respondent</p>	<p>237th Judicial District Court Lubbock County Courthouse 904 Broadway, Suite 606 Lubbock, Texas 79401</p>
<p>The Seventh District Court of Appeals of Texas at Amarillo, Respondent</p>	<p>The Seventh District Court of Appeals of Texas 501 S. Fillmore, Suite 2-A Amarillo, Texas 79101</p>

TABLE OF CONTENTS

	Page
INDEX OF AUTHORITIES	vi
REPLY BRIEF	1
I. Religious autonomy deprives the courts of jurisdiction to hear Guerrero’s defamation claims.....	2
A. <i>Westbrook</i> prohibits courts from passing on the truth of the statements Guerrero challenges.	2
B. Guerrero’s defamation claims interfere in the Diocese’s internal affairs.	8
II. Religious autonomy is not limited to the “confines” of a church building.....	8
III. Mandamus is warranted because this case is of exceptional and recurring importance.	11
PRAYER.....	12
CERTIFICATE OF COMPLIANCE	14
CERTIFICATE OF SERVICE.....	15

INDEX OF AUTHORITIES

	Page(s)
Cases	
<i>In re Alief Vietnamese All. Church</i> , 576 S.W.3d 421 (Tex. App.—Houston [1st Dist.] 2019, orig. proceeding).....	3, 4
<i>Bethel Conservative Mennonite Church v. C.I.R.</i> , 746 F.2d 388 (7th Cir. 1984).....	6
<i>D Magazine Partners, L.P. v. Rosenthal</i> , 529 S.W.3d 429 (Tex. 2017)	3
<i>Double Diamond, Inc. v. Van Tyne</i> , 109 S.W.3d 848 (Tex. App.—Dallas 2003, no pet.).....	3
<i>Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC</i> , 565 U.S. 171 (2012).....	6
<i>Hutchison v. Thomas</i> , 789 F.2d 392 (6th Cir. 1986).....	7
<i>Kavanagh v. Zwilling</i> 997 F. Supp. 2d 241,254 (S.D.N.Y. 2014).....	5, 9
<i>Kelly v. St. Luke Comm. United Methodist Church</i> , No. 05-16-01171-CV, 2018 WL 654907 (Tex. App.—Dallas 2018, pet. denied)	9
<i>Kliebenstein v. Iowa Conf. of United Methodist Church</i> , 663 N.W.2d 404 (Iowa 2003).....	9
<i>Martinelli v. Bridgeport Roman Catholic Diocesan Corp.</i> , 196 F.3d 409 (2d Cir.1999)	5
<i>NLRB v. Catholic Bishop</i> , 440 U.S. 490 (1979)	6-7

<i>Patton v. Jones</i> , 212 S.W.3d 541 (Tex. App.—Austin 2006, pet. denied)	9
<i>Presbyterian Church (USA) v. Edwards</i> , 566 S.W.3d 175 (Ky. 2018).....	7
<i>Randall’s Food Markets v. Johnson</i> , 891 S.W.2d 640 (Tex. 1995)	3
<i>Thigpen v. Locke</i> , 363 S.W.2d 247 (Tex. 1962)	4
<i>Turner v. Church of Jesus Christ of Latter-Day Saints</i> , 18 S.W.3d 877 (Tex. App.—Dallas 2000, pet. denied)	9
<i>Westbrook v. Penley</i> , 231 S.W.3d 389 (Tex. 2007)	<i>passim</i>
<i>Whole Woman’s Health v. Smith</i> , 896 F.3d 362 (5th Cir. 2018).....	10

Other Authorities

Michael McConnell & Luke Goodrich, <i>On Resolving Church Property Disputes</i> , 58 Ariz. L. Rev. 307, 336 (2016)	7
Office of Attorney General, <i>Guidance for Houses of Worship During the COVID-19 Crisis</i> (Mar. 31, 2020)	8-9
<i>Witnesses of God’s Love, Diocesan Catholic Appeal</i> (2018)	8

REPLY BRIEF

The Diocese’s Mandamus Petition explained that the trial court lacked jurisdiction to hear Guerrero’s claims, because religious autonomy prohibits adjudicating a bishop’s communications to his flock about church policy and clergy status. Mand.Pet.9-17 (discussing *Westbrook v. Penley*, 231 S.W.3d 389 (Tex. 2007)). Because “religious-liberty grounds form the basis for the jurisdictional challenge,” *Westbrook*, 231 S.W.3d at 394, mandamus is warranted. Mand.Pet.20-21.

Guerrero responds with five arguments. First, he says a claim implicating clergy “sexual misconduct” raises no “theological issue.” Mand.Resp.8 n.4. Second, he argues that the Court should determine defamation liability before reaching the jurisdictional question of religious autonomy. Mand.Resp.5-8. Third, he says the “neutral principles” doctrine should be applied. Mand.Resp.4,14. Fourth, he says his claims do not burden internal church governance. Mand.Resp.18-19. Fifth and finally, any religious autonomy the Diocese’s communications might have enjoyed if made to “[C]atholic parishioners at an internal service/meeting” was stripped by speaking to Catholics through a church website and local television interviews. Mand.Resp.11-13.

Because Guerrero’s arguments contradict *Westbrook*, they are no reason to deny mandamus. If anything, some *favor* mandamus.

First, Guerrero’s *defamation* claims inescapably require adjudicating the truth of Catholic canon law; Guerrero’s heavy reliance on tort cases

brought by *victims* of clergy sexual misconduct have nothing to do with defamation claims brought by clergy. Mand.Pet.11-15. Second, deciding liability before the jurisdictional question of religious autonomy puts the cart before the horse. Third, this Court has never extended “neutral principles” outside the church-property context. Fourth, the burden here would be enormous: adhere to a church directive and church law, or face over \$1 million in damages. Fifth, the Court of Appeals’ unprecedented decision effectively strips religious autonomy from a clergy-church communication because the communication was not password-protected. But that is a strong reason to *grant* mandamus. Mand.Pet.17-20.

Given the weighty constitutional issues, Texas legislators, religious-liberty legal scholars, and diverse religious organizations filed *amicus* briefs supporting mandamus. Absent mandamus, the Court of Appeals’ unprecedented ruling will deter all manner of religious communications and internal governance. The Court should grant the petition.

I. Religious autonomy deprives the courts of jurisdiction to hear Guerrero’s defamation claims.

A. *Westbrook* prohibits courts from passing on the truth of the statements Guerrero challenges.

Courts cannot decide Guerrero’s defamation claims, because they cannot decide whether Catholic canon law is correct to define adults who habitually lack the use of reason as “minors,” or second-guess the Diocese’s determination. Mand.Pet.9-17. Under *Westbrook*, any “claim”

that “require[s] the court to resolve a religious question” “run[s] afoul of the First Amendment.” 231 S.W.3d at 396-97.

Here, Guerrero’s defamation claims *require* evaluating whether what the Diocese said about Guerrero is true. *See Double Diamond, Inc. v. Van Tyne*, 109 S.W.3d 848, 855 (Tex. App.—Dallas 2003, no pet.) (“True statements cannot form the basis of a defamation complaint.”) (citing *Randall’s Food Markets v. Johnson*, 891 S.W.2d 640, 646 (Tex. 1995)). As *Westbrook* observed, a “defamation claim[] which would have required the court to delve into the religious question of whether [the pastor’s] statement about the biblical impropriety of [the claimant’s] behavior was true or false ... require[s] resolution of a theological matter.” 231 S.W.3d at 396 (claim was “abandoned”); *see also In re Alief Vietnamese All. Church*, 576 S.W.3d 421, 431 (Tex. App.—Houston [1st Dist.] 2019, orig. proceeding) (“Penley did not contest the dismissal of her defamation claim in the supreme court.”). Here, the basis for the Diocese’s statement about Guerrero depends on the Catholic canon law understanding of “minor.” Mand.Pet.6-7. Guerrero—and the court below—consider the Diocese’s understanding of canon law unreasonable. *See, e.g., Mand.Resp.6* (“even a dullard would believe that”); A:15. But a civil court cannot decide that Catholic beliefs are false. *See Mand.Pet.9-15*.¹

¹ Since core First Amendment speech is involved, Guerrero bears the burden of proving falsity. *See D Magazine Partners, L.P. v. Rosenthal*, 529 S.W.3d 429, 441 (Tex. 2017).

Guerrero does not dispute this standard, thus conceding it governs. See *Thigpen v. Locke*, 363 S.W.2d 247, 249 (Tex. 1962); Mand.Resp.2 (“theological controversy, church discipline, [or] ecclesiastical government” outside civil court “jurisdiction”). Instead he offers three arguments why this Court should ignore *Westbrook*.

First, he argues that any suit regarding “sexual misconduct and similar torts is not a theological issue” (Mand.Resp.8 n.4) but a “secular crime” (*id.* at 8). To this end, Guerrero cites cases involving tort claims brought by victims of clergy sexual misconduct. (*Id.* at 8 n.4). But *none* of these victim cases present a defamation claim. More broadly, whether a victim can redress injuries from clergy sexual misconduct has nothing to do with whether a church can speak with its members about clergy credibly accused of abuse. See *Alief*, 576 S.W.3d at 436 (“too broad[]” to say that “allegations of ‘inappropriate sexual behavior’ made by church officials can never be protected under the ecclesiastical abstention doctrine.”); Texas Legislators Br. 6, 12 (“discourag[ing] churches from confessing their errors and showing the specific actions taken to rectify them” inconsistent with “what the Legislature has required by law”). Unlike claims redressing sexual misconduct, Guerrero’s defamation

claims *require* an evaluation of the truth of Catholic beliefs.² That is prohibited.

The only defamation case Guerrero cites is a decades-old Louisiana appeal, *Hayden v. Schulte*. There, the court allowed a priest's lawsuit against his archdiocese to proceed because the allegedly defamatory statements were "essentially secular," as shown by the fact that there was "no evidence of Canon Law in the record." 701 So.2d 1354, 1357-59 (La. App. 4th Cir. 1997).

Even assuming *Hayden* were persuasive, here there is not just "evidence of Canon Law in the record"—canon law is the hinge on which the Diocese's actions turned. Indeed, the lower court acknowledged that "a religious term imbedded in canon law" is part of this case. A:15. The record confirms as much. *See* CR:154 (Diocese explaining reliance on canon law); CR:145-146 (canon law cited in revised list); CR:55-56 (Bishop Coerver explaining reliance on canon law, consistent with *Charter for the Protection of Children and Young People* that explicitly relies on canon law when defining "minor"); *see also* A:51 (*Charter's* canon

² For example, Guerrero cites *Martinelli v. Bridgeport Roman Catholic Diocesan Corp.*, 196 F.3d 409 (2d Cir.1999) (Mand.Resp.8 n.4). But there, "the Diocese point[ed] to no disputed religious issue." 196 F.3d at 431. It is thus categorically different. *See Kavanagh v. Zwilling* 997 F. Supp. 2d 241,254 (S.D.N.Y. 2014) (distinguishing *Martinelli* because defamation claim brought by priest involving church press release raised religious question court could not answer).

law reliance).³ Thus even on its own terms, *Hayden* is no bar to mandamus.

Second, Guerrero argues that *Westbrook* is inapplicable because “even a dullard would believe that Guerrero” was “guilty of sexual abuse of a child simply by reading the headline of the List.” Mand.Resp.6.⁴ He admits that the Diocese would have been free to “us[e] its own definition of ‘minor’” in communications about Guerrero, so long as its use was “accurate,” *i.e.*, not defamatory.⁵ Mand.Resp.18-19. This puts the cart before the horse: the question of liability on the merits should be decided *after*, not before, the jurisdictional question of whether the doctrine of autonomy applies. *See Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC*, 565 U.S. 171, 194-95 (2012) (resolving immunity claim before liability proceedings). This is because “[i]t is not only the conclusions” a civil court may reach that may “impinge rights guaranteed by the Religion Clauses, but also the very process of inquiry leading to findings and conclusions.” *NLRB v. Catholic Bishop*, 440 U.S. 490, 502

³ The *Charter* is subject to judicial notice. *See, e.g., Bethel Conservative Mennonite Church v. C.I.R.*, 746 F.2d 388, 392 (7th Cir. 1984).

⁴ The list does not use the word “child.” *See* CR:60-61.

⁵ Guerrero relies *over four times* on evidence that the trial court explicitly excluded as unauthenticated and hearsay. *Compare* Mand.Resp.7; TCPA.Resp.9-10, 14-15 *with* Mand.Pet.7 n.5 (discussing article at CR:136-138, which the trial court excluded from evidence (CR:236)). The Court could strike this already-excluded material, but it should at least disregard it.

(1979). Allowing this case to proceed will cause irreparable harm to the Diocese's First Amendment rights, harm which will be unreviewable in a future appeal. *See* Mand.Pet.16; *Presbyterian Church (USA) v. Edwards*, 566 S.W.3d 175, 179 (Ky. 2018) (allowing merits proceedings before resolving autonomy claim “would result in a substantial miscarriage of justice” (cleaned up)). Mandamus is thus necessary.

Third, Guerrero argues that the “neutral principles” doctrine that the Court of Appeals invoked “may be applied to resolve the dispute without infringing upon religious doctrine.” Mand.Resp.4, 14. Even if that were true (it's not), that would be grounds to *grant* mandamus. Neither the United States Supreme Court nor this Court has ever applied the “neutral principles” doctrine outside church-property disputes. *See* Law Professors Br. 25-27; *Westbrook*, 231 S.W.3d at 398-99; *Hutchison v. Thomas*, 789 F.2d 392, 396 (6th Cir. 1986) (neutral principles “applies only to cases involving disputes over church property.”). Rightly so. “[A] conflict between the civil law and an internal church decision” is a “fundamentally different” kind of dispute from one “between two church entities over what the church's decision was in the first place.” Michael McConnell & Luke Goodrich, *On Resolving Church Property Disputes*, 58 *Ariz. L. Rev.* 307, 336 (2016).

Here, there are no neutral principles: the trial court will be required under defamation caselaw to decide whether Catholic canon law's

definition of minor is “true.” But if “neutral principles” are to apply to Texas tort claims, this Court must say so first.

B. Guerrero’s defamation claims interfere in the Diocese’s internal affairs.

Guerrero does not contest that the Court of Appeals’ analysis got distracted by “one area of constitutional concern” and “ignore[d]” the dispositive one: the effect on internal church governance. *See Westbrook*, 231 S.W.3d at 396-97; Mand.Pet.15-17.

Here, imposition of liability would inhibit the Diocese from communicating with its members regarding credibly-accused clergy. Indeed, Guerrero seeks \$1 million in damages from the Diocese for adhering to a church directive, informed by church law. CR:7,12; TCPA.Resp.20 n.6.⁶ That does not just chill religious exercise; it threatens the Diocese’s existence.

II. Religious autonomy is not limited to the “confines” of a church building.

The Court of Appeals wrongly ruled that religious autonomy is limited to a “church’s” “confines.” Mand.Pet.17-20. In a time of coronavirus, when many churches are relying on “virtual worship,” this would effectively bar all worship. *Cf. Office of Attorney General, Guidance for Houses of Worship During the COVID-19 Crisis* (Mar. 31, 2020)

⁶ That is more than 20% of the Diocese’s annual operating budget. *See Witnesses of God’s Love, Diocesan Catholic Appeal* (2018), <https://perma.cc/F88C-T8RG> (“\$4.802 million annual budget”).

<https://perma.cc/6LFB-EK2L> (encouraging livestreaming of worship services).

Guerrero has no response. Rather, he undermines his own claims that “religious issues” are uninvolved by conceding that religious autonomy *would* protect the Diocese’s communication if it were “limited to [C]atholic parishioners at an internal service/meeting.” Mand.Resp.12; *see also id.* at 11, 13-14; TCPA.Resp.9 & n.3 (communication must be “exclusive” to members using a “login/password”). The main issue, then—or, according to the Court of Appeals, the “pivotal nuance” (A:11)—is whether religious autonomy can be stripped because of *how* the Diocese directed its communication to Catholics. But no case strips religious autonomy from publications that otherwise would receive it because of the publication’s breadth. Mand.Pet.17-20.

Guerrero’s response cites four cases (Mand.Resp.11) that in fact *support* mandamus. None of the communications in *Kliebenstein* (Mand.Pet.17), *Kelly*, and *Turner* required applying religious law, doctrine, or chilled church governance. *Patton v. Jones* agreed that there is “*not* a bright-line rule” on the role of a publication’s scope (*i.e.*, not a “pivotal nuance”). 212 S.W.3d 541, 555 n.12 (Tex. App.—Austin 2006, pet. denied) (emphasis added).

Nor does Guerrero have any response to the many cases affording religious autonomy without considering scope of publication. Mand.Pet.18. He does offer an unpersuasive distinction of *Kavanagh*,

claiming the press release there included a reference to “Church Court,” so “the alleged sexual abuse was to be viewed through the lens of church law.” Mand.Resp.13. But the list here refers to the “Diocesan Review Board” helping determine “credible allegation[s].”CR:60. These review boards are, like church courts, an apparatus of “internal church discipline and governance.” *See Hayden*, 701 So.2d at 1358; Mand.Pet.4.

Aside from the caselaw, the Court of Appeals’ standard “violate[s] ... policy concerns” of the Legislature by “intrud[ing] on the means churches use to communicate with members, requiring secure channels of communication regardless of the cost, feasibility, or limitations on access that would impose.” Texas Legislators Br.6; *see also* Mand.Pet.19-20. Indeed, the Diocese’s medium of communication reflects its broad membership dispersed across much of West Texas, one that cannot fit within four walls. Mand.Pet.19. (136,000 members, spanning 25 counties, including 61 churches). Even limiting protected communications to “[C]atholic parishioners at an internal service/meeting” (Mand.Resp.12) is impossible for the Catholic Church—whose worship services are open to all. *Cf. Whole Woman’s Health v. Smith*, 896 F.3d 362, 374 (5th Cir. 2018) (“the importance of securing religious groups’ institutional autonomy, while allowing them to enter the public square, cannot be understated”).

The problem will only get worse. Jewish synagogues in Texas now risk defamation actions brought by restaurant or grocery store owners that

“claim to be kosher while blatantly violating *kashrut* standards [and] have shut down based upon rabbis issuing” warnings to congregants not to patronize them. Jewish Coalition for Religious Liberty Br.7. Evangelization communications—necessarily with non-members—will be subject to defamation. So will online worship services—now common due to the coronavirus. In short, absent mandamus, the ability of religious organizations to participate in public life will be severely curtailed.

III. Mandamus is warranted because this case is of exceptional and recurring importance.

Similar claims are pending against the Diocese of Corpus Christi, and elsewhere nationwide. Mand.Pet.21. The Court of Appeals’ rule will allow “suit[s] against a church for doing exactly what the Legislature has required by law in other circumstances.” Texas Legislators Br.12. That is, treat sexual abuse claims with transparency and accountability. *See* CR:125-126 (list’s release “occasion for more victims ... to be appropriately ministered to” and restore lost trust). Absent mandamus, religious organizations will be deterred from doing so and First Amendment law upended—hence *amici*’s robust presence supporting mandamus. The Court should grant mandamus and correct the ruling below.

PRAYER

For the foregoing reasons and those stated in the Mandamus Petition, Relator respectfully prays that the Court grant the Petition.

Respectfully submitted,

/s/ Eric C. Rassbach

Eric C. Rassbach

Texas Bar No. 24013375

Lead Counsel

Eric S. Baxter

Non-resident attorney

William J. Haun

Non-resident attorney

The Becket Fund for Religious

Liberty

1200 New Hampshire Avenue NW

Washington, D.C. 200036

Telephone: (202) 955-0095

Facsimile: (202) 955-0090

erassbach@becketlaw.org

Thomas C. Riney

Texas Bar No. 16935100

Riney & Mayfield, LLP

320 South Polk Street, Suite 600

Amarillo, Texas 79101

Telephone: (806) 468-3200

triney@rineymayfield.com

Kerri L. Stampes

Texas Bar No. 24032170

kstampes@rineymayfield.com

Alex L. Yarbrough

Texas Bar No. 24079615

ayarbrough@rineymayfield.com

Vic Wanjura
Texas Bar No. 24050159
Hund, Krier, Wilkerson & Wright,
P.C.
3217 34th Street
Lubbock, Texas 79410
Telephone: (806) 783-8700
vwanjura@hkwwlaw.com

*Attorneys for Relator
Diocese of Lubbock*

CERTIFICATE OF COMPLIANCE

I certify that the foregoing Petition complies with Rule 9 of the Texas Rules of Appellate Procedure and the word count of this document is 2,394 words. The word processing software used to prepare this filing and calculate the word count is Microsoft Word for Office 365.

Date: April 7, 2020

/s/ Eric C. Rassbach
Eric C. Rassbach

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Petition was filed and served this seventh day of April, 2020, served electronically through eFile.TXCourts.gov on all known counsel of record, listed below:

Nick L. Olguin
nick@olguinandprice.com
OLGUIN LAW FIRM
808 1/2 Main Street
Lubbock, Texas 79401
Attorney for Respondent
Jesus Guerrero

Via Electronic Filing

Ryan E. Price
ryan@woodwardattorney.com
SIMMS, PRICE & PRICE, PLLC
1517 Main
Woodward, Oklahoma 73801

/s/Eric C. Rassbach
Eric C. Rassbach

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below:

Eric Rassbach on behalf of Eric Christopher Rassbach
Bar No. 24013375
erassbach@becketlaw.org
Envelope ID: 42178341
Status as of 04/07/2020 16:40:27 PM -05:00

Associated Case Party: Diocese of Lubbock

Name	BarNumber	Email	TimestampSubmitted	Status
Kerri L Stampes	24032170	kstampes@rineymayfield.com	4/7/2020 4:36:03 PM	SENT
Victor Wanjura	24050159	vwanjura@hkwwlaw.com	4/7/2020 4:36:03 PM	SENT
Alex Yarbrough	24079615	ayarbrough@rineymayfield.com	4/7/2020 4:36:03 PM	SENT
Thomas C. Riney	16935100	triney@rineymayfield.com	4/7/2020 4:36:03 PM	SENT
Eric Rassbach		erassbach@becketlaw.org	4/7/2020 4:36:03 PM	SENT
Eric Baxter		ebaxter@becketlaw.org	4/7/2020 4:36:03 PM	SENT
William Haun		whaun@becketlaw.org	4/7/2020 4:36:03 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Nick L.Olguin		nick@olguinandprice.com	4/7/2020 4:36:03 PM	SENT
Ryan E.Price		ryan@woodwardattorney.com	4/7/2020 4:36:03 PM	SENT