

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
ABC DENTISRY, P.A., ET AL.,	§	Cause No. 16-34221
	§	(Chapter 11)
Debtor,	§	
	§	JUDGE MARVIN ISGUR

LIMITED NOTICE OF APPEARANCE

Pursuant to Federal Rule of Civil Bankruptcy Procedure 9010(b), Lance Christopher Kassab and David Eric Kassab of The Kassab Law Firm (the “Kassab Firm”) file this Limited Notice of Appearance as counsel for Dr. Saeed Rohi (“Dr. Rohi”), a creditor in the above referenced matter.

The Kassab Firm is counsel for Dr. Rohi in a state civil lawsuit against Defendants, Brewer & Pritchard, PC, J. Mark Brewer and A. Blaire Hickman (collectively “Brewer & Pritchard”) that was filed in the 151st Judicial District Court of Harris County, Texas on June 4, 2018 (the “Harris County Lawsuit”). The Harris County Lawsuit alleges, among other things, that Brewer & Pritchard breached its contract to Dr. Rohi, committed unconscionable conduct, and breached its fiduciary duties by charging Dr. Rohi attorney’s fees in excess of 70% of his recovery when Dr. Rohi was contractually (and ethically) required to pay Brewer & Pritchard only 40%. *See* Dkt. No. 392.-1. Brewer & Pritchard has not yet filed an answer in the Harris County Lawsuit.

Instead, without notice to the Kassab Firm (who represents Rohi), and in an effort to completely and unethically conceal their activity, Brewer & Pritchard, on or about July 3, 2018, filed in this Court an Emergency Motion to Reopen Case Number 16-34221-H2-11 (the “Motion to Reopen”). *See* Dkt. No. 392. In the Motion to Reopen, Brewer & Pritchard alleges, erroneously, that the Harris County Lawsuit is a “impermissible collateral attack” on this Court’s

November 7, 2017 final order. *See id.*, at p. 1. Brewer & Pritchard requests the Court to reopen this action so that the Harris County Lawsuit can be removed to and litigated in, this Court. *Id.* Although the Motion to Reopen undoubtedly concerns and relates to the Harris County Lawsuit, Brewer & Pritchard knowingly concealed and neglected to serve the Motion to Reopen on the Kassab Firm in violation of the Texas Lawyers Creed. *See* THE TEXAS LAWYERS' CREED -- A MANDATE FOR PROFESSIONALISM, § III, ¶ 12 (“I will deliver copies to opposing counsel before or contemporaneously with submission to the Court.”).

To prevent any further suppression and overt concealment or fraud by Brewer & Pritchard, Dr. Rohi requests the Kassab Firm to receive copies of all pleadings filed or noticed by any party in this Court. The Kassab Firm is counsel for Dr. Rohi in this action only to the extent that Dr. Rohi’s rights in the Harris County Lawsuit against Brewer & Pritchard may be affected. Copies should be sent as follows:

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Dr. Rohi further requests that he be allotted additional time to respond to Brewer & Pritchard’s Motion to Reopen. Dr. Rohi is filing this Limited Notice of Appearance without consenting to this Court’s jurisdiction over the Harris County Lawsuit and/or the claims made therein and without waiving his right to trial by jury in any proceeding in these cases or any case, controversy or proceeding related to these cases or any other rights, claims, or actions.

Dated this, the 9th day of July, 2018.

Respectfully submitted,

THE KASSAB LAW FIRM

/ s / Lance Christopher Kassab

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**MALPRACTICE LITIGATION
ATTORNEYS FOR DR. SAEED ROHI**

CERTIFICATE OF SERVICE

I certify that on this day this document was served via the CM/ECF system, which will send a notice of electronic filing to all parties requesting and entitled to receive ECF notice.

Dated: July 9, 2018.

/ s / David Eric Kassab

Lance Christopher Kassab/
David Eric Kassab