

IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF TEXAS  
 HOUSTON DIVISION

KAREN MCPETERS, individually, and on §  
 Behalf of those individuals, persons and §  
 entities who are similarly situated, §  
 Plaintiff, §

V. §

CIVIL ACTION NO. 4:10-cv-1103

THE HONORABLE FREDERICK E. §  
 EDWARDS, BARBARA GLADDEN §  
 ADAMICK, DISTRICT CLERK; §  
 MONTGOMERY COUNTY, TEXAS, and §  
 REED ELSEVIER, INC., d/b/a §  
 LexisNexis, §  
 Defendants §

**UNOPPOSED MOTION TO SUBSTITUTE COUNSEL**

TO THE HONORABLE KEITH P. ELLISON, UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant Reed Elsevier Inc. d/b/a LexisNexis (“LexisNexis”) and files this Unopposed Motion to Substitute Counsel and, in support hereof, would show as follows:

Miranda Tolar of Locke Lord Bissell & Liddell LLP (“Locke Lord”) is currently listed as lead counsel of record for LexisNexis in this matter. However, Ms. Tolar recently left Locke Lord as in house counsel for a corporation where she no longer represents parties other than her employer. Accordingly, LexisNexis requests that Ms. Tolar be allowed to withdraw as counsel of record in connection with this matter and that Robert T. Mowrey, B. David L. Foster, and Amanda M. Schaeffer of Locke Lord be substituted as its counsel. B. David L. Foster is designated as attorney-in-charge. This Motion is not sought for the purpose of delay, but so that justice may be done.

The undersigned has consulted with opposing counsel, who indicated that he is unopposed to this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant Reed Elsevier Inc. d/b/a LexisNexis prays that the Court grant its Unopposed Motion to Substitute Counsel and allow the withdrawal of Miranda Tolar as counsel of record and that Robert T. Mowrey, B. David L. Foster, and Amanda M. Schaeffer of Locke Lord be substituted as its counsel, with B. David L. Foster designated as attorney-in-charge.

Respectfully submitted,

LOCKE LORD BISSELL & LIDDELL LLP

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OF COUNSEL FOR DEFENDANT REED ELSEVIER, INC.

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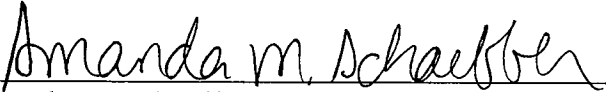
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**CERTIFICATE OF SERVICE**

I certify by my signature below that a true and correct copy of the above has been forwarded as indicated to the following on this 1st day of April, 2011.

**VIA ECF**

Robert L. Mays, Jr.  
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Amanda M. Schaeffer