

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISON**

LATINOS FOR TRUMP, BLACKS	§	
FOR TRUMP, JOSHUA MACIAS,	§	
M.S., B.G., J.B., J.J.,	§	
	§	
Plaintiffs.	§	
	§	
v.	§	CIVIL ACTION NO. 6:21-CV-43
	§	
PETE SESSIONS, MITCH	§	
McCONNELL, NANCY PELOSI,	§	
MARK ZUCKERBERG, CHUCK	§	
SCHUMER, ALEXANDRIA	§	
OCASIO-CORTEZ, BRAD	§	
RAFFENSPERGER, ALL	§	
MEMBERS OF THE 117 TH U.S.	§	
CONGRESS, et al.,	§	JURY TRIAL REQUESTED

Defendants.

**PAUL M. DAVIS’S MOTION TO WITHDRAW AS COUNSEL FOR LATINOS
FOR TRUMP, BLACKS FOR TRUMP, B.G., AND M.S.**

1. Due to Mr. Davis’s refusal to implement the strategy advocated for by Ms. SoRelle, who has a long history working with Plaintiffs Latinos for Trump, Blacks for Trump, Joshua Macias, B.G., and M.S. (the “SoRelle Plaintiffs”), these Plaintiffs have fired Mr. Davis as their counsel in this case. Mr. Davis, by now used to being fired for standing up for his principles, is saddened by the decisions of these Plaintiffs to pursue what he believes is not a sound strategy, since he was very proud to represent the same.

2. Nonetheless, the decisions of the clients must be respected, and Mr. Davis understands these clients loyalties to Ms. SoRelle.

3. Accordingly, Mr. Davis files this motion to withdraw as counsel for the SoRelle Plaintiffs. The SoRelle Plaintiffs also include Plaintiffs R.C., T.L., A.B., R.R., A.P., J.G., M.B., E.R., E.R.(2), C.H., I.M., A.L., C.S., H.D., M.T., and I.M. for which Mr. Davis also motions to withdraw as counsel.

4. As to the remaining Plaintiffs, J.B. (“Jeremy Bravo”), J.J., P.P., R.D., and H.H. (the “Davis Plaintiffs”), all wish to stick with Mr. Davis’s strategy as do both of the expert witnesses. Because the Davis Plaintiffs’ strategy and interests are no longer aligned with the SoRelle Plaintiffs, and, because the Davis Plaintiffs believe the SoRelle Plaintiffs’ claims they apparently wish to bring in to the case will be detrimental to the Davis Plaintiffs’ claims, the Davis Plaintiffs will be filing a voluntary dismissal of their claims contemporaneously herewith, and be refiling their claims in a separate lawsuit.

5. Since the Plaintiffs for whom Mr. Davis wishes to withdraw as counsel already are represented by Ms. SoRelle, who is already counsel of record in this case, it appears from Local Rule AT-3 nothing further is needed to complete the motion for withdrawal.

WHEREFORE, Paul M. Davis, hereby requests the Court grant his motion to withdraw as counsel of record for the SoRelle Plaintiffs.

/s/ Paul M. Davis

Paul M. Davis
Texas Bar No. 24078401
paul@paullovesamerica.com
Paul M. Davis & Associates, P.C.¹
3245 Main St., Suite 235-329

¹ Certificate of Formation submitted to Texas Secretary of State, filing pending.

Frisco, TX 75034
Phone: 469-850-2930
Fax: 469-815-1178

ATTORNEY FOR DAVIS PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the SoRelle Plaintiffs have been served with the foregoing document via the Court's ECF filing system on their counsel of record, Kellye SoRelle, on February 19, 2021.

/s/ Paul M. Davis _____
Paul M. Davis