

CAUSE NO. DC-22-02562

COMMISSION FOR LAWYER	§	IN THE DISTRICT COURT
DISCIPLINE,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	
	§	
SIDNEY POWELL	§	
(File Nos. 202006349, 202006347,	§	DALLAS COUNTY, TEXAS
202006393, 202006599, 202100006,	§	
202100652, 202101297, 202101300,	§	
202101301, 202103520, 202106068,	§	
202106284, 202106181)	§	
	§	
Defendant.	§	116 th JUDICIAL DISTRICT

**SIDNEY POWELL’S SECOND SUPPLEMENTAL
REPLY TO BAR’S RESPONSE TO SIDNEY POWELL’S
MOTION FOR PARTIAL SUMMARY JUDGMENT,
RULES §§ 3.03(a)(1); 3.03(a)(5); AND 8.03(a)(3)**

TO THE HONORABLE ANDREA K. BOURESSA:

Sidney Powell (“Ms. Powell”) files her Second Supplemental Reply to the Bar’s Response to her Motion for Partial Summary Judgment a traditional motion for summary judgment against the Commission for Lawyer Discipline (“Bar”) on Claims 3, 4 and 6.

1. The Bar attaches the following pleadings or portions thereof as summary judgment proof to it’s Second Amended Response:

2. Exhibit B: The altered certificate attached to Respondent's pleading in the Georgia Election Fraud Suit as Exhibit 5;
3. Exhibit C: The altered report attached to Respondent's pleading in the Georgia Election Fraud Suit as Exhibit 6;
4. Exhibit D: Respondent's pleading (without exhibits) in the Georgia Election Fraud Suit" (Page 7, ¶12.);
5. Exhibit E: Defendants' Consolidated Brief in Support of their Motion to Dismiss and Response in Opposition to Plaintiffs' Motion for Injunctive Relief in the Georgia Election Fraud Suit (without exhibits).

2. Ms. Powell objects to those exhibits as summary judgment proof and they must be stricken from the record – they are not competent summary judgment proof. A party cannot rely on other pleadings attached as exhibits to its own motion or response as summary-judgment evidence, even if the pleadings are verified. *Laidlaw Waste Sys. v. City of Wilmer*, 904 S.W.2d 656, 660-61 (Tex.1995).

Respectfully submitted,
HOLMES LAWYER, PLLC

By: /s/ Robert H. Holmes
 Robert H. Holmes
 State Bar No. 09908400
19 St. Laurent Place
Dallas, Texas 75225
Telephone: 214-384-3182
Email: rholmes@swbell.net

S. MICHAEL MCCOLLOCH PLLC
S. Michael McColloch
State Bar No. 13431950

6060 N. Central Expressway
Suite 500
Dallas, Texas 75206
Tel: 214-643-6055
Fax: 214-295-9556
Email: smm@mccolloch-law.com

and

KAREN COOK, PLLC
Karen Cook
State Bar No. 12696860
6060 N. Central Expressway
Suite 500
Dallas, Texas 75206
Tel: 214-643-6054
Fax: 214-295-9556
Email: karen@karencooklaw.com

COUNSEL FOR POWELL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been delivered, by efileTexas.gov to all attorneys of record on January 13, 2023.

/s/ Robert H. Holmes

Robert H. Holmes

Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Holmes on behalf of Robert Holmes
Bar No. 9908400
rholmes@swbell.net
Envelope ID: 71785094
Status as of 1/17/2023 9:28 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kristin Brady	24082719	kristin.brady@texasbar.com	1/13/2023 12:50:53 PM	SENT
S. Michael McColloch	13431950	smm@mccolloch-law.com	1/13/2023 12:50:53 PM	SENT
Brittany Paynton		brittany.paynton@texasbar.com	1/13/2023 12:50:53 PM	SENT
Karen Cook	12696860	karen@karencooklaw.com	1/13/2023 12:50:53 PM	SENT
Robert H.Holmes		rholmes@swbell.net	1/13/2023 12:50:53 PM	SENT
Rachel Craig		rachel.craig@texasbar.com	1/13/2023 12:50:53 PM	SENT
Todd Hill		thill@collincountytx.gov	1/13/2023 12:50:53 PM	SENT