

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA
ex rel. PAUL PIETSCHNER,

Plaintiff,

v.

KATHRYN PETRALIA;
ROBERT FROHWEIN; and
SPENCER ROBINSON,

Defendants.

Civil Action No.: 4:21-cv-110-SDJ

**DEFENDANT SPENCER ROBINSON'S UNOPPOSED MOTION FOR LEAVE
OF COURT TO FILE REPLY BRIEF IN EXCESS OF PAGE LIMITATION**

Defendant Spencer Robinson respectfully moves for leave to file an individual reply brief exceeding the page limit set forth in the Court's Order Permitting Consolidated Briefing and Extending Page Limits and Deadlines (Dkt. #64).

Under that Order, each Defendant is permitted to file a separate reply in support of their individual motion to dismiss, not to exceed 10 pages. Mr. Robinson now seeks leave to extend this limitation to 18 pages. Good cause exists for the requested extension. The government filed a 106-page consolidated opposition to Defendants' motions to dismiss (Dkt. #72), which addresses arguments raised in Mr. Robinson's individual Motion to Dismiss more than forty times. Mr. Robinson submits that a modest increase in the page limit is necessary to adequately respond to the government's extensive arguments directed specifically at his motion and to ensure the Court has a complete record upon which to decide the issues.

The Government does not oppose this request based on understandings that this will be the

only request for additional pages on the defense replies due tomorrow, and that Defendant Robinson will not oppose a reciprocal extension for the Government to address issues in Mr. Robinson's reply brief.

Accordingly, Mr. Robinson requests that the Court grant leave to file a reply brief not exceeding 18 pages.

Dated: May 8, 2025

Respectfully submitted,

/s/ Henry W. Asbill

Henry W. Asbill (admitted *Pro Hac Vice*)
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Counsel for Defendant Spencer Robinson

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2025, I caused the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

Dated: May 8, 2025

Respectfully Submitted,

/s/ Henry W. Asbill

Henry W. Asbill (admitted *Pro Hac Vice*)

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Counsel for Defendant Spencer Robinson

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), counsel for Mr. Robinson certifies compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for Mr. Robinson met and conferred in good faith with counsel for the Government, counsel for Relator, counsel for Kathryn Petralia, and counsel for Robert Frohwein via email on May 7, 2025. Counsel for Mr. Robinson met and conferred in good faith with counsel for the Government again on May 8, 2025, via telephone and email. The Government, counsel for Kathryn Petralia, and counsel for Robert Frohwein do not oppose the present Motion. As of the filing of this Motion, counsel for Relator has not responded to counsel for Mr. Robinson.

/s/ Henry W. Asbill
Henry W. Asbill
Counsel for Spencer Robinson