

**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 CORRECTED 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 10-page limit set forth in the Court's Order Permitting Consolidated Briefing and Extending Page Limits and Deadlines (Dkt. 64).

Mr. Robinson now seeks leave to extend this limitation to 11 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.

Mr. Robinson previously filed a motion for leave seeking to extend the limitation to 18 pages (Dkt. 88). The Government did not oppose this request based on understandings that this

will be the only request for additional pages on the defense replies due today, 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 11 pages.

Dated: May 9, 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 9, 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 9, 2025

Respectfully Submitted,

/s/ Henry W. Asbill

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

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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 regarding his 18-page extension (DKT. #88) 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 did not oppose the Motion. Mr. Robinson is revising his request to seek only 11 pages. 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