



3. One week later, and days after the Court has already granted the City's Plea to the Jurisdiction, the City now seeks to "unpop the popcorn" and remove from the record the patently false affidavit already introduced as evidence in support of the City's plea to the jurisdiction. At that hearing Brown pointed out the City's tendency to "sue first and ask questions later" – and the City's current motion is yet another example of the City failing to investigate their own allegations before presenting them in open court as facts upon which the Court can rely in issuing its ruling.

4. Notably, the City's Motion neither apologizes for their counsel's defamatory statements against Brown and Gordon, nor seeks to strike the same allegations made by counsel accusing Brown/Gordon of lying to the Court.

5. It is inherently prejudicial to Brown to permit the City to introduce the Badders affidavit into the record, have the Court grant the City's requested relief and dismiss the Brown counterclaim based (in part) on that evidence, then permit the City to remove the evidence from the record "after-the-fact" as if it were never submitted in the first place. The appropriate course of action would be to allow the City to supplement the record and seek to correct their false representations to the Court; but not to allow their patently false affidavit to be removed from the already-established record.

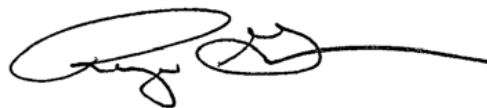
6. Should the Court seek to entertain the post-judgment request by the City to remove evidence already submitted into the record, Brown hereby requests that the court first grant Brown's request for a rehearing and allow the record to be supplemented as may be necessary to correct the City's false statements and misrepresentations to the Court.

**PRAYER**

For these reasons, Counter-Plaintiff Twanda Brown asks the Court to deny the City's request to supplement the record, or in the alternative to re-open the hearing on the City's First Amended Plea to the Jurisdiction and allow for an evidentiary hearing to receive evidence from Ms. Badders and whatever additional evidence may be required to address the City's error.

Respectfully submitted,

**The Law Office of Roger Gordon**



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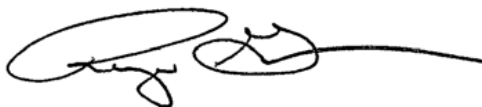
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**ATTORNEY FOR TWANDA BROWN**

**CERTIFICATE OF SERVICE**

I do hereby certify compliance with Tex. R. Civ. P. 21. A true and correct copy of the foregoing instrument has been served on all counsel, who have appeared herein by electronic transmission to the electronic mail address on file with the electronic filing manager Rule 21a(1). If a party has not designated an electronic mail address with the electronic filing manager the party was served a true and correct copy of the foregoing instrument in person, by mail, by commercial delivery service by fax **or by e-mail**, or by such other manner as the Court in its discretion may direct. Rule 21a(2). Service was made on all parties as provided on July 23, 2019.

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