UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DAVE CAMPBELL and CATRENIA "DAWN" CAMPBELL,)
Plaintiffs;))
♥.) C.A. NO. 4:12-cv-00165
WOODLAND LAKES TRUSTEESHIP, INC. NATIONAL DEVELOPMENT COMPANY, INC., CLYDE W. ENGLE, CRAIG KINMANN, CHERYL DAVIS, FRANCIS OSCAR DARIAN, JR., ARTHUR HURLBURT, RUSSELL RICHARDS, DEBORAH CLUTTER, PATRICIA EDGAR, CRYSTAL KALLANSRUD, SIMONE HATTON, LARRY ANDERSON, LAWRENCE DEIS, LINDA WADE, and THOMAS LEON COLYOTT.)))))))))
Defendants.)

PLAINTIFFS' OBJECTION TO DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND PLAINTIFFS' PETITION

COMES NOW PLAINTIFFS, Dave and Catrenia Dawn Campbell, and objecting to Defendants' response, as follows:

- I. Defendants were not entitled to oppose Plaintiffs' "Motion For Leave To

 Amend Plaintiffs' Petition" because:
 - A. Defendants have not yet filed a responsive pleading.
 - B. At the pre-motion conference for said motion (02/23/12),
 Defendants were unopposed to Plaintiffs' motion.
- Plaintiffs "Motion For Leave of Court to Amend Plaintiffs' Petition" was filed on March 05, 2012, and hand-delivered to Defendants' attorney on

March 05, 2012. Defendants' response was filed on March 27, 2012. Defendants' deadline to file a response did expire on March 26, 2012.

 Defendants did not file a motion for leave in order to file a response out of time.

Respectfully Submitted,

Dave and Dawn Campbell 109 Rainbow Drive #921 Livingston, TX 77399

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(936) 239-7747

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of PLAINTIFFS' OBJECTION TO DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND PLAINTIFFS' PETITION has been served upon Counsel Wallace by enclosing a copy of the same in a sealed envelope and mailing via the United States Postal Service's Certified Mail, on May 3rd, 2012, with Certified Label No.: 7011 2000 0001 3223 9551.

Defendants:

Woodland Lakes Trusteeship, Inc., National Development Company, Inc., Clyde W. Engle, Francis Oscar Darian, Jr., Lawrence Deis, Craig Kinmann, Arthur Hurlburt, Russell Richards, Deborah Clutter, Patricia Edgar, Crystal Kallansrud, Simone Hatton, Linda Wade, Larry Anderson and Thomas Leon Colyott.

ATTORNEY OF RECORD:

Woodland Lakes Trusteeship, Inc., et al

ATTN: Casey T. Wallace

% Haynes Boone, Attorneys and Counselors

1221 McKinney Street, Suite 2100

Houston, Texas 77010-2007

Signed and served this 3rd day of May, 2012

Dave Campbell

Dawn Campbell