

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
SAN ANGELO DIVISION

---

Jose Ramon Motino-Lopez,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	Cause No. 6:25-cv-00089-H
	)	
Waden,	)	
Eden Detention Center et al	)	
	)	
Respondents.	)	

---

PETITIONER’S MOTION TO WAIVE LOCAL COUNSEL

Petitioner, by and through undersigned counsel, respectfully moves the Court to waive the requirement that the party be represented by local counsel in this matter, pursuant to the Court’s inherent authority and the Local Civil Rules of the Northern District of Texas. In support of this Motion, the moving party would show the Court as follows:

I. INTRODUCTION

Undersigned counsel is admitted to practice before the United States District Court for the Northern District of Texas and is counsel of record for [Party Name] in this action. Although undersigned counsel does not maintain

an office within the Northern District of Texas, the circumstances of this case warrant waiver of the local counsel requirement, and good cause exists for such relief.

## II. GROUNDS FOR WAIVER

### *i. Admission and Familiarity with Local Rules*

Undersigned counsel is duly admitted to practice before this Court and is fully familiar with the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of Texas, and the procedures of this Court. Counsel agrees to comply with all applicable rules and orders.

### *ii. Availability for In-Person Proceedings*

Undersigned counsel will be available to personally appear for all in-person hearings, conferences, trials, or other proceedings in the San Angelo Division should the Court determine that such appearances are necessary. Waiver of local counsel will not impede the efficient administration of justice or the Court's ability to conduct proceedings.

### *iii. Efficiency and Cost Considerations*

Requiring local counsel in this matter would impose unnecessary additional expense on the client without providing a corresponding benefit to the Court or the parties. Undersigned counsel has primary responsibility for the case and is fully capable of managing all aspects of the litigation.

*iv. No Prejudice to the Parties or the Court*

Waiver of the local counsel requirement will not prejudice any party. All filings will be made electronically in compliance with CM/ECF requirements, and undersigned counsel will remain readily accessible to opposing counsel and the Court.

III. REQUEST FOR RELIEF

For the foregoing reasons, Attorney Javier Rivera, counsel for Petitioner, respectfully requests that the Court enter an Order waiving the requirement of local counsel in this case and granting such other and further relief to which the moving party may be justly entitled.

IV. CONFERENCE REQUIREMENT

Pursuant to Local Rule 7.1, undersigned counsel contacted the opposing party but has been unable to ascertain their position at the time of filing of this motion. An update of the opposing counsel's position on this motion will be provided as soon as a response is provided.

/s/Javier Rivera  
Javier Rivera, Esq.  
Lead Counsel for Petitioner  
Texas Bar No. 24070508  
Rivera & Shirhatti, PC  
PO Box 848  
Houston, Texas 77001  
jrivera@rsimmilaw.com  
(P): (832) 991-1105

**CERTIFICATE OF SERVICE**

I certify that, on December 17, 2025, the foregoing was filed and served on all attorneys of record via the District's ECF system

/s/Javier Rivera

Javier Rivera

Attorney for Petitioner