

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARIA FERNANDA RICO ANDRADE,  
individually and on behalf of the estate of  
Gerardo Lozano Rico, deceased,

*Plaintiff,*

v.

UNITED STATES OF AMERICA,  
UNITED STATES CUSTOMS &  
BORDER PROTECTION, UNITED  
STATES OFFICE OF BORDER PATROL,  
JANET NAPOLITANO, DAVID V.  
AGUILAR, ALAN BERSIN, MICHAEL J.  
FISHER, ROSENDO HINOJOSA, DAVID  
COULS, REYES DIAZ, JOSE TEJEDA,  
and EBERTO CABELLO,

*Defendants.*

**No. 15-cv-00103**

**PLAINTIFFS' MOTION FOR RECONSIDERATION**

Pursuant to Federal Rule of Civil Procedure 59(e), Plaintiff, Maria Fernanda Rico Andrade, hereby moves the Court to reconsider certain issues raised in Andrade's opposition to Defendants' Motion to Dismiss, but not addressed in the Court's Memorandum and Order, ECF No. 31. The grounds supporting this request are set forth more fully in the accompanying Memorandum in Support. This Motion will be served on opposing counsel via the Court's CM/ECF system.

WHEREFORE, Defendants respectfully request that the Court grant this motion and reconsider certain issues raised in Andrade's opposition to Defendants' Motion to Dismiss.

Dated: August 9, 2017

*/s/ Robert C. Hilliard*

Robert C. Hilliard

State Bar No. 09677700  
Federal ID No. 5912  
HILLIARD MUNOZ GONZALES, LLP  
719. S. Shoreline Blvd. Ste. 500  
Corpus Christi, Texas 78401  
Telephone: (361) 882-1612  
Fax: (361) 882-3015  
Email: bobh@hmglawfirm.com

**ATTORNEY-IN-CHARGE FOR PLAINTIFF**

**OF COUNSEL:**

Catherine D. Tobin  
State Bar No. 24013642  
Federal ID No. 25316  
Email: catherine@hmglawfirm.com

Rudy Gonzales, Jr.  
State Bar No. 08121700  
Federal ID No. 1896  
rudy@hmglawfirm.com

Marion M. Reilly  
State Bar No. 24079195  
Federal ID No. 1357591  
marion@hmglawfirm.com

HILLIARD MUNOZ GONZALES, LLP  
719. S. Shoreline Blvd. Ste. 500  
Corpus Christi, Texas 78401  
Telephone: (361) 882-1612  
Fax: (361) 882-3015

Steve D. Shadowen (admitted *pro hac vice*)  
Pennsylvania State Bar No. 41953  
steve@hilliardshadowenlaw.com

Matthew C. Weiner (admitted *pro hac vice*)  
Pennsylvania State Bar No. 314453  
matt@hilliardshadowenlaw.com

HILLIARD & SHADOWEN LLP  
2407 S. Congress Ave., Suite E 122  
Austin, TX 78704  
Telephone: (855) 344-3298