



# STATE BAR OF TEXAS

## Minimum Continuing Legal Education

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September 14, 2022

Heather Melissa Penning  
12410 Dutch Harbor Ln  
Humble, 77346-3691

Bar Card No. 24101239

Dear Ms. Penning:

This is to acknowledge that you have completed the training requirement of Texas Estates Code Sec. 1054.201, requiring four hours of credit, including one hour on alternatives to guardianship and support and services available to proposed wards.

You are hereby certified, with respect to this requirement, as eligible to be appointed as an attorney for an applicant for guardianship and a court appointed attorney in a guardianship proceeding, including an attorney ad litem, in Texas courts. This letter serves as your certificate for purposes of this requirement as of the date of this letter.

We have determined that the training you have completed meets the statutory training requirements set forth in Tex. Govt. Code Sec. 81.114 Attorney Instruction Related to Guardianship Issues.

Pursuant to the Texas Estates Code Sec. 1054.202, this certificate expires on the second anniversary of the date this certificate was issued. Prior to said expiration date, you will need to request re-certification from the State Bar if you wish to continue your eligibility for appointments.

*Erica Rodriguez*

Erica Rodriguez  
Director  
Minimum Continuing Legal Education