



Shelby Raye Holt

Associate

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Shelby's practice is devoted to insurance coverage litigation and appellate law. Regarding her insurance practice, Shelby counsels primary, umbrella, and excess insurers in first and third-party coverage litigation and advises insurers on coverage issues under commercial liability, environmental liability, commercial property, homeowners', errors and omissions, and auto policies. Shelby also has experience successfully defending carriers against extra-contractual and statutory bad faith claims involving residential and commercial insurance. Moreover, Shelby's appellate experience assists her insurer-clients throughout the claims process, during the transition from the investigation stage to actual litigation, and at the appellate review level.

Regarding her appellate practice, Shelby has significant experience preparing appellate briefs, mandamus filings, motions to dismiss, summary-judgment motions, expert motions, jury charges, and post-judgment motions in both Texas state and federal courts. She is often brought in to research complex issues, and her superior writing and analytical abilities make her a valuable asset during trial and on appeal.

Shelby also handles general litigation matters in professional liability, premises liability, and other types of lawsuits. This includes preparing pleadings, engaging in discovery, and conferring with clients.

Shelby is also a certified mediator.

Representative Experience

- Obtained nonsuit of all extra-contractual claims against commercial liability insurer in complex product recall coverage action
- Obtained full dismissal of breach of contract and extra-contractual claims against personal auto insurer in Arkansas state court
- Obtained favorable opinion from court of appeals for commercial liability insurer in construction defect case, reversing trial court's judgment granting motion for

Services & Industries

- Insurance Coverage
- Insurance Litigation
- Appellate
- Litigation

- new trial and reinstating an order of dismissal on the grounds of abandonment, and successfully defended court of appeals' decision in state supreme court
- Obtained full dismissal of carrier's Rule 202 petition to obtain pre-suit discovery in carrier versus carrier dispute over underlying commercial auto policy
 - Successfully moved to strike opposing causation expert in multi-million dollar Hurricane Harvey commercial property insurance dispute pending in federal court
 - Prepared jury verdict form for environmental liability insurer in complex environmental pollution coverage case in federal court
 - Obtained summary judgment of purported additional insured's extra-contractual claims and claims for attorney's fees in environmental pollution coverage case for environmental liability insurer
 - Counseled excess liability carrier in high-profile class action lawsuit involving alleged traumatic brain injuries
 - Obtained favorable opinion from court of appeals for commercial property insurer denying insured mandamus relief challenging order compelling discovery of insured's prior, identical claims for hail damage made to former property insurer
 - Obtained favorable opinion from court of appeals for commercial liability insurer denying class action certification in toxic tort case
 - Advised carrier regarding complex personal automobile policy questions involving state and federal minimum insurance requirements in Texas and New Mexico
 - Obtained summary judgment in premises-liability claim on behalf of homeowner

Education

- Baylor University School of Law (J.D., 2017)
 - Certification in Real Estate and Natural Resources
 - Joseph Milton Nance Full Tuition Scholarship Recipient
- Texas A&M University (B.A., 2014)
 - Communication
- A.A. White Dispute Resolution Center, University of Houston Law Center (J.D., 2013)
 - Certified Mediator

Bar Admissions

- Texas, 2017

Court Admissions

- United States District Court, Southern District of Texas, 2018
- United States District Court, Eastern District of Texas, 2018
- United States District Court, Northern District of Texas, 2021

Professional and Community Activities

- Houston Young Lawyers Association, 2017-present
- State Bar of Texas Insurance Law Section, 2017-present
- Houston Masterworks Chorus, 2019-present

- Claims & Litigation Management Alliance Greater Houston Chapter, 2019-present

Publications

- The Good, the Bad, and the Ugly: What Is and What is Not an Effective *Stowers Demand*