

No. 2020-77309

MLF-AR, L.L.C.	§	IN THE DISTRICT COURT OF
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
LUCIA SILVAS	§	152 ND JUDICIAL DISTRICT

Affidavit of Stephen A. Mendel

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

On this day, Stephen A. Mendel appeared before me, the undersigned notary public, and upon his oath, he said:

1. My name is Stephen A. Mendel. I am over the age of twenty-one, a resident of Harris County, Texas, and competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit and they are true and correct. I am authorized and competent to execute this affidavit in my capacity as a person employed by The Mendel Law Firm, L.P. ("MLF"), and as the owner of the plaintiff, MLF-AR, L.L.C. ("MLF-AR"). I am also a custodian of the records of MLF and MLF-AR.

2. I am an attorney duly licensed to practice law in the State of Texas. I have been licensed as an attorney since November 1987. I primarily practice in Harris County, Texas, and the counties surrounding Harris County, Texas. My practice includes, but is not limited to, litigation and appeals in the state and federal courts of Texas.

3. I am familiar with the reasonable fees charged by attorneys in Harris County and the surrounding counties, and in legal matters such as this case. I am also familiar with the factors set forth in *Rohrmoos Ventures v. UTSW DVA Healthcare*, 578 S.W. 3d 469 (Tex. 2019), *Arthur Anderson v. Perry Equip. Corp.*, 945 S.W.2d 812 (Tex. 1997), and Rule 1.04 of the Texas Rules of Professional Conduct.

4. MLF was retained by Lucia Silvas ("Silvas"), individually, and as the Applicant to probate a holographic Will in the Estate of Abdulwahid Daoud, to render legal services in a highly contested case regarding:

- (a) to probate the Estate of Abdulwahid Daoud.
- (b) to litigate a competing application to probate a prior Will.
- (c) to defend her against claims of undue influence related to the holographic Will that Silvas offered for probate, for undue influence regarding beneficiary designations on Decedent's financial accounts, and for an accounting.

5. Exhibit 1 is a true and correct copy of the parties' agreement regarding the legal services to be performed (the "Engagement Letter"). Per the Engagement Letter, Silvas agreed to pay MLF its standard hourly rates of \$175.00 to \$395.00 per hour for attorneys and \$75.00 to \$130.00 for legal assistants during the relevant time periods, subject to increases in the hourly rates as provided by the Engagement Letter. The foregoing rates are usual, customary, and reasonable for the services rendered or to be rendered by MLF.

7. MLF represented Silvas from January 2, 2018, to February 21, 2019, a period of thirteen (13) months. During that period, MLF performed extensive legal services and incurred expenses on Silvas's behalf and invoiced Silvas from time to time for those services. The services included, but were not limited to, fact investigation; case analysis; strategy development and implementation; document review and organization; review and preparation of pleadings filed in the case; preparing for and attending judicial hearings; preparing and/or responding to written discovery; preparing, organizing, and/or responding to document productions; preparing for and attending depositions, and preparing and/or responding to various motions filed during the course of the representation.

8. MLF kept systematic records of the work performed for Silvas. Exhibit 2 is a true and correct copy of the redacted billing history of the legal services provided by MLF. The billing history is comprised of records made and kept in the ordinary course of business of MLF. It was MLF's regular practice is to make the records at or near the time of the event recorded. The records were made by or from information transmitted by a person with knowledge acting in the regular course of MLF's law practice.

9. Exhibit 3 is a true and correct copies of Silvas's account statement (the "Account Statement"). The Account Statement accurately sets forth the nature and amount of the services provided to Silvas, the dates on which the services were performed, the charges incurred, and any payments, offsets, or credits. The Account Statement is a record made and kept in the ordinary course of business of MLF, and MLF's regular practice is to make the record at or near the time of the event recorded. The record is made by, or from information transmitted by, a person with knowledge acting in the regular course of business.

10. As reflected by the Account Statement, after all just and lawful offsets, payments, and credits, Silvas remains liable for \$76,516.35, such amount being just, true, and due since February 21, 2019.

10. Demands were made for the unpaid balance. Silvas did not tender payment. The account was assigned to Plaintiff, MLF-AR, and entity wholly owned and controlled by myself, Stephen A. Mendel. As a result of Silvas's nonpayment, Plaintiff incurred attorneys' fees to pursue its claim.

11. The hourly rate of \$395.00 per hour for myself is a reasonable hourly rate for an attorney with my skill, knowledge, experience, education, and training. The hourly rate of \$195.00 per hour for Ms. Emily J. Wyatt is a reasonable hourly rate for an attorney with her skill, knowledge, experience, education, and training.

12. The fees and expenses for the legal services rendered sought by myself and my law firm are both reasonable and necessary for the reasons set forth in our live pleadings, including, but not limited to, the motion for summary judgment.

A. The fees for time and labor are reasonable to address the legal issues before the Court in this proceeding, including, but not limited to, preparation of certain mandatory pleadings, responses, and arguments for said legal issues regarding probate administration.

1) Furthermore, MLF prepared an accounting for actions of Silvas in regards to Decedent, Abdulwahid Daoud.

2) MLF propounded the following discovery:

- i) Eleven (11) interrogatories to Rebecca Kramer.
- ii) Thirty-six (36) requests for production to Rebecca Kramer.
- iii) Eleven (11) interrogatories to Hope Wills.
- iv) Thirty-six (36) requests for production to Hope Wills.

3) MLF responded to the following discovery from Kramer & Wills on behalf of Silvas:

- i) Sixty-nine (69) requests for admissions.
- ii) Sixteen (16) interrogatories.
- iii) Seventy-six (76) requests for production, which required production of 1,315 pages of responses documentation.

4) MLF also negotiated request for a temporary injunction, and attended a full-day mediation, among other contested issues related to the Estate.

5) MLF investigated the status of several parcels of real property owned in whole or in part by the Decedent's Estate.

B. The fees are reasonable considering the complexity, time, and work imposed in this case, and in light of the amount of the net recovery to the Estates. Per the settlement agreement, Silvas was to receive \$74,277.00 from two accounts at Prosperity Bank, and upon the sale of real estate owned by the Estate, she was to receive additional funds.

C. Furthermore, due to the highly contested nature of this Will Contest, substantial additional work was imposed not only by Texas law, but also by the actions of the Contestants, Rebecca Kramer & Hope Wills, which prevented MLF from taking on other work, as described herein.

D. To confirm the contested nature of this case, attached hereto as Exhibit 4 is a true and correct listing of the Court's electronic docket sheet, which confirms all filings MLF submitted and/or responded to with this Court up to its withdrawal on February 21, 2019.

E. In arriving at my opinion of the value of reasonable attorney's fees in this action, I have utilized and considered the following criteria:

- (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal service properly;
 - (2) the likelihood . . . that the acceptance of the particular employment will preclude other employment by the lawyer;
 - (3) the fee customarily charged in the locality for similar legal services;
 - (4) the amount involved and the results obtained;
 - (5) the time limitations imposed by the client or by the circumstances;
 - (6) the nature and length of the professional relationship with the client;
 - (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and
 - (8) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.
- (See *Arthur Anderson v. Perry Equip. Corp.*, 945 S.W.2d 818-19 (Tex. 1997); *Rohrmoos Venture v. UTSW DVA Healthcare, LLP*, 578 S.W.3d 469, 500 (Tex. 2019)).

9. In reviewing the State Bar of Texas 2015 Rate Fact Sheet for this area of law in the Houston-area and based on my years of experience, my hourly rate of \$250.00 - \$295.00 is reasonable.

Hourly Rates by Geographic Region by Years of Experience
2015 Median Hourly Rates

2015 Median Hourly Rates by Region by Years of Experience							
Region by Years of Experience	2 or less years	3 to 6 years	7 to 10 years	11 to 15 years	16 to 20 years	21 to 25 years	Over 25 years
Houston-The Woodlands-Sugarland MSA	\$213 (N = 145)	\$250 (N = 211)	\$265 (N = 125)	\$257 (N = 130)	\$300 (N = 92)	\$300 (N = 103)	\$300 (N = 322)
Dallas-Fort Worth-Arlington MSA	\$217 (N = 135)	\$250 (N = 210)	\$250 (N = 161)	\$300 (N = 113)	\$300 (N = 99)	\$300 (N = 112)	\$350 (N = 292)

(State Bar of Texas 2015 Rate Fact Sheet)

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Hourly Rates by Practice Area by Geographic Region (continued)
2015 Median Hourly Rates

2015 Median Hourly Rates by Practice Area by Region (Continued)								
Practice Area by Region	Houston-The Woodlands-Sugarland MSA	Dallas-Fort Worth-Arlington MSA	Austin-Round Rock MSA	San Antonio-New Braunfels MSA	El Paso MSA	Corpus Christi MSA	Beaumont-Port Arthur MSA	Central Texas MSAs
Litigation: Personal	\$200 (N = 135)	\$185 (N = 104)	\$200 (N = 20)	\$175 (N = 42)	\$160 (N = 13)	\$160 (N = 11)	\$200 (N = 11)	~
Military	~	~	~	~	~	~	~	~
Oil & Gas	\$300 (N = 100)	\$268 (N = 48)	\$300 (N = 14)	\$250 (N = 17)	~	\$250 (N = 7)	~	~
Other	\$250 (N = 49)	\$278 (N = 36)	\$250 (N = 19)	\$300 (N = 16)	~	~	~	~
Public Utility Law	~	~	\$320 (N = 12)	~	~	~	~	~
Real Estate	\$275 (N = 150)	\$285 (N = 162)	\$275 (N = 60)	\$250 (N = 57)	\$213 (N = 10)	\$250 (N = 11)	\$250 (N = 9)	\$250
School Law	\$250 (N = 9)	\$205 (N = 11)	\$249 (N = 6)	~	~	~	~	~
Securities Law	\$400 (N = 26)	\$375 (N = 23)	\$375 (N = 15)	~	~	~	~	~
Social Security Law	~	~	~	~	~	~	~	~
Taxation	\$350 (N = 62)	\$400 (N = 42)	\$325 (N = 20)	\$288 (N = 12)	~	~	~	~
Technology	~	\$350 (N = 9)	\$369 (N = 8)	~	~	~	~	~
Wills-Trusts-Probate	\$275 (N = 147)	\$275 (N = 134)	\$275 (N = 48)	\$250 (N = 65)	\$225 (N = 7)	\$213 (N = 14)	\$250 (N = 7)	~ (N = 11)

Note: Attorneys could report working in more than one practice area. Rates are reported only for groups with six or more observations.

(State Bar of Texas 2015 Rate Fact Sheet)

10. Further, in reviewing the 2019 Standards for Court Approval of Attorney Fee Application from Harris County, the hourly rates of myself and Ms. Wyatt are reasonable since such rates are lower than the estimated amount for an attorney with our respective years of experience.

Years Practicing Probate and Guardianship Law	Court-Approved Rate
0 – 2 years	up to \$200/hour
3 – 5 years	up to \$250/hour
6 – 10 years	up to \$300/hour
11 – 16 years	up to \$350/hour
17 + year	up to \$450/hour

11. Further, the affiant can show sufficient evidence of reasonableness through its billing practices with regard to the following factors to justify the calculation of attorney's fees:

(1) particular services performed;

- (2) who performed those services;
 - (3) approximately when the services were performed;
 - (4) the reasonable amount of time required to perform the services; and
 - (5) the reasonable hourly rate for each person performing such services.
- (*Rohrmoos Venture*, 578 S.W.3d at 502; see also *City of Laredo v. Montano*, 414 S.W.3d 731 (Tex. 2013)).

12. My C.V. is available online at <https://www.mendellawfirm.com>. However, in terms of the education, experience, and qualifications of myself and the MLF team, I would offer the following:

- A. I have been practicing law in the State of Texas for over thirty (30) years, and I spends approximately eighty-five percent (85%) or more of my time working in the areas of estate and trust planning, corporate litigation, probate and trust administrations, guardianships, and litigation arising out of probate and trust administrations.
- B. Emily J. Wyatt is an attorney licensed by the State of Texas. At the time of this lawsuit, she had been practicing law for approximately five (5) years. Ms. Wyatt now has approximately nine (9) years of experience. She spends approximately ninety percent (90%) or more of her time working in the areas of estate and trust planning, probate and trust administrations, guardianships, and litigation arising out of probate and trust administrations.
- C. Melissa Tubbs, f/k/a Melissa Mauger was a legal assistant with MLF. Mrs. Tubbs obtained a Bachelor of Science degree in Interdisciplinary Studies from Texas A&M University. Ms. Tubbs spent approximately eighty percent (80%) or more of her time working in the areas of estate and trust planning, probate and trust administrations, and guardianships.
- D. Timothy Jadloski was an associate attorney licensed by the State of Texas. At the time of this lawsuit, he had been practicing law for approximately four (4) years. He spent approximately ninety percent (90%) or more of his time working in the areas of commercial litigation and litigation arising out of probate and trust administrations.
- E. Rachel Rosinski is a legal assistant with MLF. Ms. Rosinski is in the process of obtaining her Juris Doctorate from South Texas College of Law - Houston. Ms. Rosinski spends approximately eighty percent (80%) or more of her time working in the areas of estate and trust planning, probate and trust administrations, and guardianships.

13. A reasonable fee through this summary judgment, for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability, is \$7,500.00.

14. If plaintiff responds, in whole or in part, to any post-trial motions, then \$3,500.00 per response is a reasonable fee for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability.

15. If plaintiff makes or responds to a restricted appeal or bill of review, then \$15,000.00 is a reasonable fee for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability.

16. If plaintiff makes or responds to, in whole or in part, an appeal before the Court of Appeals, then \$15,000.00 is a reasonable fee for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability.

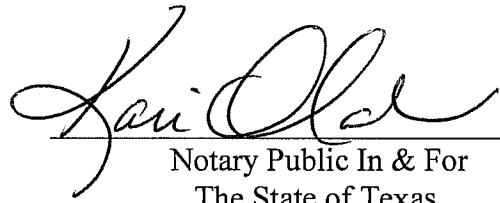
17. If plaintiff makes or responds to a petition for review to the Texas Supreme Court, then \$15,000.00 is a reasonable fee for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability.

18. If the petition for review to the Texas Supreme Court is granted, then \$15,000.00 is a reasonable fee for the same or similar services performed by an attorney in Harris County with my experience, reputation, and ability.



Stephen A. Mendel, President of The
Mendel Law Firm, L.P., and the Plaintiff,
MLF-AR, L.L.C.

SWORN TO AND SUBSCRIBED before me on October 3, 2022.



Notary Public In & For
The State of Texas

THE MENDEL LAW FIRM, L.P.

Attorneys & Counselors

E-Mail Address:
emily@mendellawfirm.com

1155 Dairy Ashford, Suite 104
Houston, Texas 77079

Tel: 281-759-3213
Fax: 281-759-3214

VIA HAND DELIVERY

EXHIBIT 1

January 2, 2018

Re: Agreement for Legal Services.

Lucia Silvas
7543 Brush Wood Dr.
Houston, TX 77088

Dear Ms. Silvas:

We thank you for your interest in retaining our firm to assist you. As we previously discussed, this letter sets forth the agreement between The Mendel Law Firm, L.P. (the "Firm" or "MLF") (and includes any successor entity to MLF) and yourself, Lucia Silvas (the "Client") (whether one or more), with respect to Client's desire to employ MLF to represent Client in a probate proceeding for the *Estate of Abdulwahid H. Daoud, Deceased* (the "Work"). The term "Client" is limited solely to you.

1. Authority to Act:

A. Client authorizes MLF to perform the Work as described above, and to perform such other and further Work as agreed by Client and MLF, or as MLF, in its sole discretion, deems necessary to protect Client's interests, including, but not limited to the following:

- 1) Apply to the Court and seek the admission of the holographic Will to probate.
- 2) Assist with your appointment as executor of the Estate.
- 3) Obtain letters testamentary to the extent needed to probate the Estate.
- 4) Marshal, identify, and verify the value of Estate assets.
- 5) Assist in the division of assets of the Estate.
- 6) Notify creditors, to the extent required by law.
- 7) Assist in the determination of whether or not any creditor's claims are valid.
- 8) Prepare an inventory, appraisal, and list of claims for the Estate.
- 9) Such legal research, if any, needed to complete the foregoing.
- 10) Coordinate with your tax advisors as needed.

- B. In the event litigation arises in the probate of this Estate, then Client authorizes MLF to prosecute and/or defend such lawsuits, if any, to settlement or final judgment.
- C. Client agrees that MLF may refuse to perform any work for any reason, including, but not limited to, the reason that, in MLF's sole opinion, Client's objectives lack merit, the objectives are not warranted under the facts, or under existing law, or if such objectives cannot be supported by a good faith argument for an extension, modification, or reversal of existing law, or if such objectives are economically unfeasible for MLF to pursue.

2. Compensation & Expenses:

A. Compensation:

- 1) In consideration for the services rendered or to be rendered by MLF, Client agrees to pay MLF the standard hourly rates of MLF's attorneys, legal assistants, and law clerks for work performed on Client's behalf, plus expenses.
- 2) At the present time, MLF's standard hourly rates are as follows: (1) attorneys – \$175.00 to \$395.00 per hour; (2) law clerks – \$95.00 to \$130.00 per hour; and (3) legal assistants – \$75.00 to \$130.00 per hour. The foregoing rates are subject to change without notice or any subsequent approval, and generally change on or about January 1 of each new calendar year. Invoices are due and payable in Harris County, Texas within ten (10) days of issuance.

B. Expenses:

- 1) Client understands that all expenses incurred in the investigation, development, and litigation of Client's case may be advanced by MLF, but shall remain the ultimate responsibility of Client. Expenses include, but are not limited to, those that relate to couriers, court reporters, depositions, filing fees, investigation, long distance and cellular charges, legal research, non-reimbursed court costs, photocopies, postage, service of process, subpoenas, taxes, and travel.
- 2) Client understands that, as a general rule, Client will be charged: (1) \$0.20/page for internal photocopies and faxes; and (2) \$20.00 per daily logon for legal research through Westlaw/West Group, plus such other charges, if any, as may be assessed by Westlaw/West Group for research related to non-Texas authorities or databases.

3. Trust Account:

- A. Client agrees to pay MLF \$5,000.00 as a retainer that MLF will deposit into its Iolita trust account. Client agrees to pay MLF a partial retainer payment of \$2,500.00 to file the application to probate Will. Client further agrees to pay MLF the remaining \$2,500.00 of the \$5,000.00 retainer prior to any hearing on this matter and no later than January 31, 2018.
- CLIENT FURTHER AGREES TO CONTINUOUSLY KEEP THE TRUST**

BALANCE AT NOT LESS THAN \$5,000.00. During the course of this engagement, it may be necessary in MLF's judgment to request the payment of an additional retainer or retainers, and, if so requested, Client agrees to promptly deposit the additional retainer or retainers with MLF.

- B. CLIENT WARRANTS AND REPRESENTS THAT ANY AMOUNT REQUESTED BY MLF AS A RETAINER DOES NOT CONSTITUTE A WARRANTY, REPRESENTATION, GUARANTEE, OR ESTIMATE OF THE COST OF THE WORK, AND THAT THE WORK MAY BE LESS THAN, EQUAL TO, AND/OR MORE THAN THE RETAINER SO REQUESTED.**
- C. The deposit of the retainer will not eliminate or modify Client's obligation to pay promptly all invoices which MLF periodically renders. Upon conclusion of the work, MLF will refund any excess funds that remain in the trust account.
- D. All proceeds received on Client's behalf will be deposited into MLF's Iolita trust account, from which MLF may reimburse itself or pay third parties for expenses incurred on Client's behalf, reimburse itself for the fees earned, and then remit the balance, if any, to Client.
- E. Client irrevocably makes, constitutes, and appoints MLF as Client's attorney-in-fact, with a power coupled with an interest, to sign Client's name and negotiate all checks or other instruments in settlement or payment of any judgment, and to deposit such proceeds into MLF's Iolita trust account, from which MLF may reimburse itself or pay third parties for expenses incurred on Client's behalf, reimburse itself for the fees earned, and then remit the balance, if any, to Client. It is further agreed that the grant of the foregoing power of attorney shall survive the termination, if any, of this Agreement or the attorney/client relationship.
- F. In order to secure the payment of all sums due under this Agreement, Client grants MLF a security interest in all real and personal property of the Estate, and further authorizes MLF, in its discretion, to perfect such security interest by filing such lien(s) and/or financing statement(s) as MLF deems reasonable and/or necessary. As such, this Agreement constitutes a security agreement.

4. Invoices:

- A. From time to time, MLF will bill Client for legal services rendered and expenses incurred on Client's behalf. Client agrees to pay all invoices within seven (7) days after receipt of such invoices. Client further agrees that MLF may deduct all unpaid fees, and expenses from all proceeds recovered from any other parties to this or a related action during the pendency of any action related to this matter.
- B. Notwithstanding the fact that MLF will issue invoices at such intervals as MLF, in its sole discretion, deems appropriate or necessary, Client is always free to request invoices at more frequent intervals, and MLF will endeavor to accommodate those more frequent intervals.

Client agrees, however, that all such requests must be in writing.

- C. A failure by Client to pay all sums due to MLF will, at the option of MLF, result in a cessation of work then in progress until all outstanding balances are brought current.
- D. Time and expenses incurred in the collection of outstanding fees, expenses, and/or judgments due MLF shall also be billed to Client at MLF's standard hourly rates. In addition, Client shall be billed at MLF's standard hourly rates for invoices to be prepared in a manner other than MLF's standard format.
- E. The outstanding balance of any fee, expense, or judgment due MLF, and which remains unpaid for more than fifteen (15) days from the date the invoice or judgment was issued shall bear interest on the outstanding balance at the rate of 1.5% per month, compounded annually, until paid in full.
- F. Client authorizes MLF, and such agents or representatives as MLF may retain for the collection of amounts due MLF, to process electronic payments, such electronic payments to include, but not necessarily be limited to:
 - 1) Electronic checks or ACH transactions against Client's bank account, if Client provides MLF with the minimum information required to process an ACH transaction; and/or
 - 2) Credit card payments, if Client provides MLF with the minimum information required to process a credit card payment.

All invoices issued under this Agreement assume payment by cash, check, or wire transfer. Payments by credit card incur a convenience fee of four and one-half percent (4.5%) of the payment amount. Payments by ACH incur a convenience fee equal to one percent (1%) of the payment amount. Client understands and agrees that all fees permitted by this paragraph are in addition to all other fees or charges that may be assessed against or owed by Client.

5. Entire Agreement:

This Agreement contains the entire agreement between the parties hereto relative to the subject matter hereof, and supersedes all prior and contemporaneous negotiations relative to the subject matter hereof. No variation, alteration, modification, amendment, or change of this Agreement shall be binding upon any party hereto unless set forth in a document duly executed by the parties. Client further agrees that it will make no claim at any time or place that this Agreement has been orally altered or modified or otherwise changed by oral communication of any kind or character or by any course of dealing.

6. Electronic Rider:

Client and MLF agree that, with respect to this Agreement, all signed documents transmitted by email or machine shall be treated in all manner and respects as an original document. Any

signed fax, electronic, digital, or photocopy document shall be considered to have the same binding legal effect as the original signed document. Either party may request that a fax, electronic, digital, or photocopy document be re-executed as an original document and in its original form, and the other party hereby agrees to promptly comply with such request. The parties agree that neither shall raise the use of a fax, electronic, digital, or photocopy signature as a defense to this contract and forever waive such defense.

7. Imaging of Documents.

A. Client understands and agrees that MLF's document retention policy may involve the:

- 1) Imaging of this Agreement and other documents sent by MLF to or received by MLF from Client and/or any persons or entities regarding the subject matter of this Agreement or the Work required under this Agreement or by Client; and
- 2) The destruction of the paper originals of all such documents.

B. Client, therefore, forever waives any right that Client may have to a claim that the imaged copies are not originals; provided, however, either party may allege and prove that the imaged copy was altered without the challenging party's knowledge and/or consent.

8. Termination/Withdrawal:

A. Our relationship is based upon mutual consent and you may terminate our representation at any time, with or without cause; provided, however, notice of termination shall not be effective unless expressed in writing and received by MLF. Please note, however, that any termination of MLF's services will not affect your responsibility to pay any fees and/or expenses due MLF.

B. Client agrees that MLF may withdraw from representation of Client for any reason, including, but not limited to, the reason that Client has not paid any sums due under this Agreement. This right of withdrawal is unlimited and extends, specifically, to withdrawal from any court proceeding in which MLF is representing Client. Any withdrawal by MLF does not serve as a waiver to any fees and/or expenses owed by Client under the terms set forth in this Agreement.

9. State Bar of Texas Notice:

The State Bar of Texas investigates and prosecutes professional misconduct committed by Texas attorneys. Although not every complaint against or dispute with a lawyer involves professional misconduct, the State Bar's Office of General Counsel will provide Client with information about how to file a complaint. Please call 1-800-932-1900 for more information.

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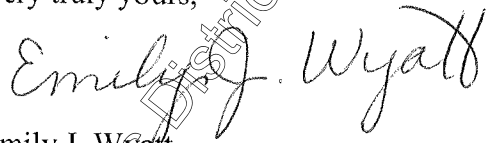
10. Time is of the Essence:

Time is of the essence as to all of Client's obligations under this Agreement.

Please carefully re-read the agreement set forth above. As you re-read and understand each page, please initial each page in the lower right hand corner. If the foregoing accurately sets forth our mutual agreement, please sign the last page of this letter where indicated below and return a signed copy of the agreement to us.

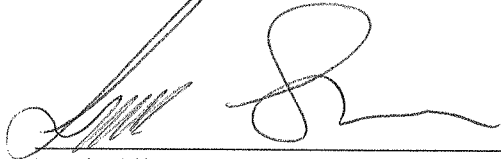
We appreciate the opportunity to be considered for this matter.

Very truly yours,



Emily J. Wyatt
For the Firm

AGREED & ACCEPTED:



Lucia Silvas, Individually &
As the Independent Executrix of
the Estate of Abdulwahid H. Daoud

Date Signed: January 2, 2018

AGREED & ACCEPTED:

Stephen A. Mendel,
For the Firm

Date Signed: January 2, 2018

The Mendel Law Firm, L.P.

Attorneys & Counselors

1155 Dairy Ashford, Suite 104

Houston, TX 77079

Tel: 281-759-3213

Fax: 281-759-3214

Lucia Silvas
7543 Brush Wood Drive
Houston, TX 77088

EXHIBIT 2

April 20, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23622

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
3/19/2018	MM	Conferred with	0.20 129.50/hr	No Charge
3/20/2018	EJW	Conferred with re prepared correspondence to S. Padua re request for discovery extension.	0.20 250.00/hr	50.00
	EJW	Reviewed prepared	0.60 250.00/hr	150.00
	MM	Conferred with conferred with prepared	1.00 129.50/hr	129.50

The firm accepts personal checks, cashier's checks, money orders, wire transfers, American Express, MasterCard, Visa, and Paypal. For more information, please call our office or email minh@mendellawfirm.com for further details.

LS-001290

			<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2018	EJW	Conferred with re reviewed the file re finalized correspondence to reviewed and revised the Rule 11 agreement for discovery extension.	0.70 250.00/hr	175.00
	EJW	Prepared responses to request for disclosure.	0.40 250.00/hr	100.00
	MM	Conferred with re ; prepared correspondence to prepared correspondence to S. Padua re extension for responses to discovery requests.	0.50 129.50/hr	64.75
	MM	Pprepared correspondence to re prepared correspondence to S. Padua re extension for responses to discovery requests; prepared Rule 11 agreement re same; conferred with prepared correspondence to S. Padua re same.	1.00 129.50/hr	129.50
	SAM	Reviewed the file re	0.20 395.00/hr	No Charge
3/22/2018	MM	Updated litigation index re order to substitute counsel.	0.10 129.50/hr	No Charge
3/23/2018	EJW	Finalized the Rule 11 agreement.	0.20 250.00/hr	50.00
	MM	Filed the Rule 11 agreement re extension for responses to discovery requests; prepared correspondence to	0.30 129.50/hr	38.85

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2018	EJW	Reviewed	0.30	75.00
		conferred with	250.00/hr	
		updated litigation index.		
	MM	Reviewed	0.30	No Charge
		; updated	129.50/hr	
		with		
3/27/2018	EJW	Conferred with	0.20	No Charge
			250.00/hr	
	MM	Met with	0.50	64.75
		conferred	129.50/hr	
		with		
3/29/2018	EJW	Prepared correspondence to and reviewed	0.30	75.00
		correspondence from	250.00/hr	
Subtotal For Professional Services			7.00	\$1,102.35
Summary of Expenses				
		Filing Fees		2.06
Subtotal For Expenses				\$2.06
Subtotal For Professional Services			7.00	\$1,104.41

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June 05, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23685

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
4/4/2018	EJW	Revised	1.50 250.00/hr	375.00
4/5/2018	EJW	Prepared correspondence to	0.10 250.00/hr	No Charge
	LCG	Reviewed and organized client documents.	1.40 129.50/hr	181.30
4/6/2018	EJW	Revised	0.80 250.00/hr	200.00
4/7/2018	EJW	Revised prepared correspondence to	1.70 250.00/hr	425.00
4/9/2018	EJW	Conferred at length with	0.40 250.00/hr	100.00

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LS-001293

			<u>Hrs/Rate</u>	<u>Amount</u>
4/9/2018	EJW	Finalized and served responses and objections to requests for production and request for disclosure.	2.40 250.00/hr	600.00
	MM	Reviewed and revised reviewed correspondence from	0.30 129.50/hr	38.85
	MM	Conferred with	0.20 129.50/hr	No Charge
4/13/2018	EJW	Updated client file re	0.30 250.00/hr	No Charge
4/16/2018	EJW	Reviewed and organized	1.10 250.00/hr	275.00
	SAM	Conferred with	0.10 395.00/hr	No Charge
4/18/2018	EJW	Reviewed and organized prepared file memo re same; prepared correspondence to	2.30 250.00/hr	575.00
	MM	Reviewed correspondence from D. Payne re documents production; reviewed correspondence from prepared	1.00 129.50/hr	129.50
4/19/2018	EJW	Reviewed first request for interrogatories, second request for production, and first request for admissions; updated	1.10 250.00/hr	275.00
	EJW	Conferred with	0.30 250.00/hr	No Charge

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/19/2018	EJW	Conferred with	0.20 250.00/hr	No Charge
	SAM	Conferred with reviewed	0.30 395.00/hr	118.50
	MM	Revised prepared updated litigation index re interrogatories, request for admissions, and second request for production; reviewed and prepared docket matters re same; conferred with	2.50 129.50/hr	323.75
4/20/2018	TJJ	Reviewed authorities re reviewed Secretary of State records	0.20 195.00/hr	39.00
	MM	Prepared correspondence to updated file memo re	1.50 129.50/hr	194.25
4/23/2018	SAM	Conferred with	0.20 395.00/hr	No Charge
	EJW	Reviewed and organized updated file memo re	2.80 250.00/hr	700.00
	EJW	Revised file memo re reviewed competing application to probate 1982 Will.	0.60 250.00/hr	150.00
	EJW	Reviewed	1.30 250.00/hr	325.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		updated file memo re		
4/23/2018	MM	Reviewed and organized	2.00	259.00
		prepared	129.50/hr	
		updated litigation		
		index re R. Kramer's application to probate		
		holographic Will; conferred with		
		reviewed Secretary of State's		
		records re		
4/27/2018	MM	Prepared correspondence to	0.30	38.85
		reviewed	129.50/hr	
		correspondence from		
4/30/2018	EJW	Reviewed the file re	0.40	100.00
			250.00/hr	
	MM	Updated file memo re	0.20	No Charge
			129.50/hr	
Subtotal For Professional Services			27.50	\$5,423.00
Summary of Expenses				
		Copies		27.00
		Litigation Support Vendor		52.48
Subtotal For Expenses				\$79.48
Subtotal For Professional Services			27.50	\$5,502.48
Total Amount Of This Bill				\$5,816.89

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June 05, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23686

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2018	EJW	Reviewed deposition notice and subpoena duces tecum for Salvador Rosas (notary); prepared correspondence to reviewed updated file memo re prepared correspondence to	0.80 250.00/hr	200.00
	MM	Updated litigation index re notice of intent to take deposition; reviewed and prepared docket matters re same.	0.30 129.50/hr	No Charge
5/3/2018	EJW	Reviewed correspondence from and prepared correspondence to prepared correspondence to	0.50 250.00/hr	125.00

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LS-001297

			<u>Hrs/Rate</u>	<u>Amount</u>
		updated file memo re		
5/4/2018	MM	Prepared correspondence to	0.10 129.50/hr	No Charge
5/7/2018	EJW	Reviewed correspondence from and prepared correspondence to	0.40 250.00/hr	100.00
5/8/2018	EJW	Reviewed requests for production; organized updated prepared correspondence to	2.70 250.00/hr	675.00
5/9/2018	EJW	Prepared correspondence to	0.10 250.00/hr	No Charge
5/10/2018	EJW	Reviewed correspondence from and prepared correspondence to	0.30 250.00/hr	75.00
	MM	Prepared memo re	0.30 129.50/hr	No Charge
5/11/2018	EJW	Met with	1.10 250.00/hr	275.00
	EJW	Reviewed, organized, and updated updated file memo re	0.70 250.00/hr	175.00
5/16/2018	MM	Prepared verification for interrogatories; prepared correspondence to met with	0.50 129.50/hr	64.75
5/18/2018	EJW	Revised responses and objections to second requests for production; reviewed and organized documents for production; conferred with	2.90 250.00/hr	725.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/18/2018	ATSF	Reviewed the file re reviewed and organized documents for production; prepared conferred with	1.80 15.00/hr	27.00
	ATSF	Reviewed the	1.30 15.00/hr	19.50
5/19/2018	EJW	Revised responses to requests for production; reviewed and organized revised responses and objections to interrogatories, admissions, and 1st supplemental disclosures; prepared correspondence to	4.60 250.00/hr	1,150.00
5/20/2018	EJW	Revised responses to admissions.	2.80 250.00/hr	700.00
5/21/2018	EJW	Prepared Rule 11 agreement; prepared correspondence to opposing counsel re same.	0.40 250.00/hr	100.00
	EJW	Revised, finalized, and served responses to admissions, interrogatories, and production; conferred with	3.70 250.00/hr	925.00
	SAM	Reviewed and revised L. Silvas answers and objections to the interrogatories, requests for admissions, and requests for production.	3.00 395.00/hr	1,185.00
	MM	Conferred with prepared	0.50 129.50/hr	64.75
5/22/2018	EJW	Prepared file memo.	0.20 250.00/hr	50.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/22/2018	MM	Reviewed and prepared docket matters	0.20 129.50/hr	No Charge
5/24/2018	MM	Conferred with	0.10 129.50/hr	No Charge
5/28/2018	EJW	Reviewed and organized finalized correspondence to conferred with	0.60 250.00/hr	150.00
	EJW	Finalized request for disclosures to Wills and Kramer; conferred with	0.40 250.00/hr	100.00
	MM	Reviewed documents for production; reviewed finalized correspondence to conferred with	1.20 129.50/hr	155.40
5/29/2018	MM	Conferred with	0.20 129.50/hr	No Charge
5/30/2018	EJW	Reviewed file re prepared memo for	0.60 250.00/hr	150.00
	SAM	Traveled to, attended, and returned from the deposition of Salvador Rosas re	3.00 395.00/hr	1,185.00
Subtotal For Professional Services			35.30	\$8,376.40

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Summary of Expenses

	<u>Amount</u>	
Copies		0.40
Delivery services/messengers		12.29
Subtotal For Expenses		<u>\$12.69</u>
Subtotal For Professional Services	35.30	<u>\$8,389.09</u>
Total Amount Of This Bill		<u>\$8,389.09</u>

Unofficial Copy Office of Marilyn Burgess District Clerk

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July 09, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23778

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2018	EJW	Reviewed the file re	0.50 250.00/hr	125.00
6/5/2018	MM	Prepared correspondence to	0.10 129.50/hr	No Charge
6/6/2018	MM	Prepared documents for production; reviewed	2.50 129.50/hr	323.75
6/7/2018	EJW	Revised supplemental responses to first and second requests for production.	0.80 250.00/hr	200.00
	EJW	Prepared	0.20 250.00/hr	50.00
	MM	Prepared documents for production	3.50 129.50/hr	453.25

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LS-001302

			<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2018	EJW	Revised and finalized documents for supplemental response to requests for production; prepared correspondence to counsel re same.	3.20 250.00/hr	800.00
	SAM	Reviewed and revised	0.30 395.00/hr	118.50
	MM	Prepared responses to requests for production; finalized correspondence to counsel re same.	2.50 129.50/hr	323.75
6/11/2018	MM	Updated file memo re reviewed	0.50 129.50/hr	64.75
6/12/2018	MM	Met with	0.20 129.50/hr	No Charge
6/18/2018	ATSF	Reviewed organized documents for production.	0.90 129.50/hr	116.55
6/19/2018	EJW	Reviewed the file re prepared correspondence to	0.10 250.00/hr	No Charge
6/20/2018	EJW	Reviewed correspondence from and prepared correspondence to	0.50 250.00/hr	125.00
	MM	Prepared correspondence to	0.50 129.50/hr	64.75
6/21/2018	EJW	Revised the second supplemental responses to first and second requests for production.	0.70 250.00/hr	175.00
	ATSF	Reviewed and organized documents for production.	0.80 129.50/hr	103.60
6/22/2018	EJW	Revised responses to second supplemental production of documents.	0.80 250.00/hr	200.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/22/2018	MM	Prepared documents for production; revised table of contents; prepared correspondence to counsel re second supplement to requests for production.	1.50 129.50/hr	194.25
	ATSF	Reviewed discovery responses and production.	0.30 129.50/hr	No Charge
6/27/2018	EJW	Conferred with	0.30 250.00/hr	75.00
	MM	Prepared correspondence to	0.10 129.50/hr	No Charge
6/28/2018	EJW	Reviewed onferred with	0.40 250.00/hr	100.00
	MM	Updated file memo re prepared correspondence to	0.40 129.50/hr	51.80
		Subtotal For Professional Services	21.60	\$3,664.95
		Summary of Expenses		
		Copies		24.80
		Postage		73.23
		Subtotal For Expenses		\$98.03
		Subtotal For Professional Services	21.60	\$3,762.98

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	<u>Amount</u>
Total Amount Of This Bill	\$4,213.45
6/20/2018 Payment applied to invoice -- thank you.	<u>(\$1,200.00)</u>
Total payments and adjustments	(\$1,200.00)

Unofficial Copy Office of Marilyn Burgess District Clerk

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August 14, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23874

Professional Services			Hrs/Rate	Amount
7/5/2018	EJW	Prepared and filed designation of experts; reviewed H. Wills' designation of experts.	0.60 250.00/hr	150.00
	EJW	Conferred with updated file memo re	0.40 250.00/hr	100.00
	MM	Updated litigation index re designation of experts.	0.20 129.50/hr	No Charge
7/9/2018	SAM	Conferred with	0.20 395.00/hr	No Charge
	EJW	Conferred with	0.20 250.00/hr	No Charge
7/12/2018	EJW	Prepared correspondence to	0.10 250.00/hr	No Charge

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LS-001306

			<u>Hrs/Rate</u>	<u>Amount</u>
7/13/2018	EJW	Finalized and served supplemental request for disclosures.	0.20 250.00/hr	50.00
7/17/2018	EJW	Reviewed the amended Will contest.	0.20 250.00/hr	No Charge
	SAM	Reviewed the amended pleadings; conferred with	0.20 395.00/hr	79.00
7/19/2018	EJW	Conferred with	0.30 250.00/hr	No Charge
	MM	Prepared correspondence to	0.20 129.50/hr	25.90
7/23/2018	EJW	Reviewed the file re R. Kramer's amended pleading; reviewed authorities re	0.60 250.00/hr	150.00
	EJW	Reviewed R. Kramer's and H. Wills' first amended response to disclosures.	0.50 250.00/hr	125.00
	MM	Reviewed responses to requests for disclosure; updated litigation index	0.40 129.50/hr	No Charge
7/27/2018	ATSF	Prepared no-evidence motion for summary judgment; updated	1.00 129.50/hr	129.50
Subtotal For Professional Services			5.30	\$809.40
Subtotal For Professional Services			5.30	\$809.40
Total Amount Of This Bill				\$1,361.17

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September 12, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 23943

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2018	EJW	Revised reviewed authorities re prepared no evidence motion for summary judgment reviewed authorities	3.10 250.00/hr	775.00
8/2/2018	EJW	Reviewed correspondence from D. Smith re deposition of J. Masson; prepared correspondence to and reviewed correspondence from	0.20 250.00/hr	No Charge
8/3/2018	EJW	Prepared correspondence to counsel re proposed dates for J. Masson's deposition; prepared correspondence to and reviewed correspondence from conferred with	0.60 250.00/hr	150.00

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LS-001309

			<u>Hrs/Rate</u>	<u>Amount</u>
8/3/2018	SAM	Conferred with	0.20 395.00/hr	No Charge
8/6/2018	EJW	Finalized and served correspondence to counsel re J. Masson's deposition availability.	0.30 250.00/hr	75.00
	EJW	Finalized and served no-evidence motions for summary judgment re beneficiary designations and Will contest.	0.50 250.00/hr	125.00
	SAM	Conferred with	0.20 395.00/hr	No Charge
	EJW	Prepared and filed objection to temporary administrator's inventory, appraisal, and list of claims.	0.50 250.00/hr	125.00
	MM	Filed no-evidence motions for summary judgment.	0.30 129.50/hr	No Charge
8/7/2018	EJW	Conferred with	0.10 250.00/hr	No Charge
	MM	Updated litigation index re notice of intent to depose J. Masson; prepared correspondence to reviewed and prepared docket matters re J. Masson's deposition.	0.40 129.50/hr	No Charge
8/9/2018	EJW	Prepared correspondence to reviewed reviewed the file updated file memo reviewed request for L. Silvas' deposition.	0.70 250.00/hr	175.00
	MM	Finalized and filed notice of hearing re objection to the inventory; conferred with the court clerk re hearing for same.	0.30 129.50/hr	38.85

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2018	EJW	Conferred with D. Smith re L. Silvas' production and deposition of L. Silvas and J. Masson; reviewed the file re prepared correspondence to	0.40 250.00/hr	100.00
	SAM	Conferred with	0.30 395.00/hr	118.50
	MM	Updated litigation index re correspondence from D. Payne re L. Silvas deposition; prepared production binders; conferred with court clerk re hearing for objection to inventory; reviewed and prepared docket matters re same; prepared correspondence to	2.00 129.50/hr	259.00
	EJW	Conferred with conferred with	0.40 250.00/hr	No Charge
8/13/2018	SAM	Conferred with	0.20 395.00/hr	No Charge
	EJW	Reviewed correspondence from and prepared correspondence to D. Smith re depositions and supplemental discovery; served same; prepared correspondence to and reviewed correspondence from conferred with	1.30 250.00/hr	325.00
	MM	Reviewed prepared documents for production.	0.80 129.50/hr	103.60
8/14/2018	EJW	Reviewed the file re	0.20 250.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2018	EJW	Prepared correspondence to counsel re J. Masson report; served same with exhibits; conferred with A. Covey re depositions.	0.70 250.00/hr	175.00
	MM	Conferred with S. Padua and D. Payne re hearing passed for objection to inventory; filed notice of hearing re no evidence motions for summary judgment; prepared documents for production.	1.50 129.50/hr	194.25
8/17/2018	EJW	Reviewed correspondence from and prepared correspondence to counsel re deposition dates for L. Silvas; prepared correspondence to	0.20 250.00/hr	50.00
8/21/2018	EJW	Reviewed file re reviewed correspondence from and prepared correspondence to prepared correspondence to C. Evangelista re deposition of L. Silvas.	0.10 250.00/hr	No Charge
	EJW	Prepared for and met with reviewed contestants' motion for continuance.	1.30 250.00/hr	325.00
8/22/2018	EJW	Reviewed notice of intent to take deposition of L. Silvas and subpoena duces tecum; updated file memo re	0.30 250.00/hr	75.00
	MM	Updated litigation index re notice of intent to depose L. Silvas; reviewed and prepared docket matters re same.	0.20 129.50/hr	No Charge
8/23/2018	EJW	Reviewed file re prepared and filed motion to quash deposition, proposed order re same, motion for protection, and proposed order re same; conferred with prepared correspondence to counsel re same and August 28 hearing.	1.70 250.00/hr	425.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2018	MM	Conferred with prepared correspondence to court re pass hearing re objection to inventory, motion to quash L. Silvas deposition, and motion for protective order; prepared notice of hearing for notice of hearing and motion for protective order.	0.50 129.50/hr	64.75
8/24/2018	EJW	Conferred with revised, finalized, and filed response to motion for continuance and prepared exhibits and proposed order for same; reviewed authorities re prepared correspondence to counsel re same and passing of August 30 hearing.	2.30 250.00/hr	575.00
	TJJ	Conferred with prepared same; reviewed authorities re	3.00 195.00/hr	585.00
	MM	Conferred with the court clerk re hearings re motion to quash the deposition L. Silvas and motion for protective order; prepared correspondence to the court re same; reviewed response to motion for continuance.	0.50 129.50/hr	64.75
8/27/2018	EJW	Prepared for August 28 hearing; conferred with reviewed 2nd amended petition for declaratory judgment.	1.00 250.00/hr	250.00
	MM	Updated litigation index re second amended opposition to application; prepared documents for hearing.	0.70 129.50/hr	90.65
8/28/2018	EJW	Prepared for, traveled to, attended, and returned from court re hearing on motions for continuance, quashing of deposition, and motion for protection.	2.40 250.00/hr	600.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018	EJW	Reviewed correspondence from the court re orders on deposition, protection, and continuance; prepared correspondence to prepared correspondence to counsel re medical subpoena documents request; conferred with	0.90 250.00/hr	225.00
	EJW	Prepared requests for production and interrogatories for R. Kramer.	0.60 250.00/hr	150.00
	MM	Updated litigation index re amended notice of intent to depose L. Silvas.	0.10 129.50/hr	No Charge
8/30/2018	EJW	Reviewed notices of intent to take deposition on written questions re several medical providers; updated	1.10 250.00/hr	275.00
	EJW	Prepared for and met with	1.50 250.00/hr	375.00
	MM	Updated litigation index re notice of intent to issue deposition by written questions to multiple healthcare providers of A. Daoud; reviewed and prepared docket matters re same; conferred with	0.50 129.50/hr	64.75
	Subtotal	For Professional Services	34.10	\$6,934.10
	Summary of Expenses			
	Copies			16.40
	Filing Fees			4.12
	Travel & Parking			15.00
	Subtotal	For Expenses		\$35.52

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		<u>Amount</u>
Subtotal For Professional Services	34.10	\$6,969.62
Total Amount Of This Bill		\$7,414.10

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The Mendel Law Firm, L.P.

Attorneys & Counselors

1155 Dairy Ashford, Suite 104

Houston, TX 77079

Tel: 281-759-3213

Fax: 281-759-3214

Lucia Silvas
7543 Brush Wood Drive
Houston, TX 77088

October 25, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 24054

Professional Services

				<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2018	SAM	Conferred with	re	0.20 395.00/hr	No Charge
8/27/2018	SAM	Conferred with	re	0.20 395.00/hr	No Charge
9/4/2018	EJW	Reviewed notice of intent to take depositions on written questions re TD Ameritrade and Prosperity Bank; conferred with L. Gilliland re conference room reservations for depositions.		0.50 250.00/hr	125.00
	EJW	Prepared for and met with	re	1.50 250.00/hr	375.00
	MM	Updated litigation index re jury demand and notice of intent to issue deposition by written questions on TD Ameritrade and Prosperity; prepared correspondence to opposing		2.30 129.50/hr	297.85

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			<u>Hrs/Rate</u>	<u>Amount</u>
		counsel re L. Silvas' deposition; prepared documents for production.		
9/5/2018	EJW	Prepared requests for production to R. Kramer and H. Wills; prepared interrogatories to R. Kramer and H. Wills; conferred with re	2.60 250.00/hr	650.00
	EJW	Reviewed and organized the litigation index.	0.60 250.00/hr	150.00
	SAM	Conferred with re	0.20 395.00/hr	No Charge
9/6/2018	EJW	Prepared for and met with re	1.60 250.00/hr	400.00
	EJW	Reviewed the file re opposition to September 2017 Will; prepared file memo re	1.90 250.00/hr	475.00
	MM	Reviewed and organized the pleadings binder.	1.00 129.50/hr	129.50
9/7/2018	SAM	Conferred with re	0.50 395.00/hr	197.50
	SAM	Conferred with E. Wyatt re prepared correspondence to re	0.30 395.00/hr	118.50
	MM	Finalized supplemental production; prepared correspondence to counsel re same; filed supplemental production; prepared documents for deposition; updated litigation index re first and second amended inventory; conferred with K. Graham re inventory and value of assets.	2.00 129.50/hr	259.00
	EJW	Prepared for and attended deposition of L. Silvas.	9.80 250.00/hr	2,450.00

			<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2018	EJW	Prepared correspondence to re	0.10 250.00/hr	No Charge
	EJW	Conferred with J. Jennings (Digital Forensic Corp.) re cell phone analysis; reviewed correspondence from and prepared correspondence to re prepared correspondence to re	0.60 250.00/hr	150.00
	MM	Conferred with Infinity Reporting re overdue invoice; prepared correspondence to L. Silvas re same.	0.20 129.50/hr	25.90
9/12/2018	EJW	Reviewed correspondence from and prepared correspondence to re	0.10 250.00/hr	No Charge
9/14/2018	EJW	Conferred with re	0.20 250.00/hr	No Charge
Subtotal For Professional Services			26.40	\$5,803.25
Summary of Expenses				
Copies				10.60
Subtotal For Expenses				\$10.60
Subtotal For Professional Services			26.40	\$5,813.85
Interest On Overdue Balance				\$832.78
Total Amount Of This Bill				\$6,646.63
Previous Balance				\$39,854.70

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	<u>Amount</u>
Total payments and adjustments	<u>(\$1,501.00)</u>
Balance due	<u>\$45,000.33</u>

Unofficial Copy Office of Marilyn Burgess District Clerk

The Mendel Law Firm, L.P.

Attorneys & Counselors

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Houston, TX 77079

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Lucia Silvas
7543 Brush Wood Drive
Houston, TX 77088

November 14, 2018

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 24069

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
9/17/2018	KGH	Reviewed and organized documents for the trial binders.	2.50 129.50/hr	No Charge
	MM	Reviewed and organized documents for the trial binders.	0.50 129.50/hr	No Charge
9/18/2018	MM	Updated file memo re ; reviewed and prepared docket matters re deadline for revisions of same.	0.20 129.50/hr	No Charge
9/19/2018	EJW	Prepared correspondence to J. Jennings (Digital Forensics Corp) re cell phone analysis.	0.30 250.00/hr	75.00
9/20/2018	SAM	Processed payment for the benefit of the forensic examiner.	0.20 395.00/hr	No Charge
	EJW	Conferred with Digital Forensics Corp re cell phone analysis and cloning kit; conferred with re	0.40 250.00/hr	No Charge

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/21/2018	EJW	Revised first amended motions for summary judgment; reviewed authorities re	1.70 250.00/hr	425.00
	SAM	Conferred with re	0.20 395.00/hr	No Charge
	MM	Reviewed correspondence from and prepared correspondence to re	0.10 129.50/hr	No Charge
9/25/2018	EJW	Reviewed notice of intent to take deposition on written questions.	0.20 250.00/hr	No Charge
	MM	Updated litigation index re notice of delivery re Home Health Resources records.	0.10 129.50/hr	No Charge
9/26/2018	ML	Conferred with J. Jennings (Digital Forensics) re cell phone analysis; conferred with at length with Digital Forensics phone technician re transferring data from cell phone to external hard drive.	0.80 129.50/hr	103.60
	MM	Finalized phone data transfer; conferred with representative from Digital Forensics Corp re same; prepared correspondence to Digital Forensics Corp re same.	0.40 129.50/hr	51.80
9/27/2018	EJW	Finalized and filed first amended motion for summary judgment re Will and first amended motion re beneficiary designations and conversion; filed notice of hearing.	1.60 250.00/hr	400.00
	TJ	Reviewed and revised L. Silva's no-evidence motion for summary judgment re will contest; reviewed and revised L. Silva's no-evidence motion for summary judgment re beneficiary designations and conversion claim.	0.40 195.00/hr	78.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/2/2018	EJW	Reviewed L. Silvas' deposition; updated file memo re prepared	3.00 250.00/hr	750.00
	TJJ	Conferred with re	0.50 195.00/hr	No Charge
10/3/2018	TJJ	Reviewed and revised	1.00 195.00/hr	195.00
	MM	Reviewed Texas Comptroller's unclaimed property records for A. Daoud.	0.40 129.50/hr	No Charge
	EJW	Prepared for and met with L. Silvas re deposition corrections.	1.60 250.00/hr	400.00
	EJW	Conferred with re	0.40 250.00/hr	No Charge
	EJW	Reviewed deposition transcript; prepared deposition corrections for court reporter.	1.50 250.00/hr	375.00
10/4/2018	TJJ	Reviewed and revised L. Silva's deposition corrections; conferred with re ; reviewed and served same.	1.70 195.00/hr	331.50
	EJW	Revised deposition corrections.	1.80 250.00/hr	450.00
	EJW	Conferred with re	0.40 250.00/hr	No Charge
10/5/2018	MM	Conferred with Inifinity Reporting re confirmation of deposition revisions.	0.20 129.50/hr	No Charge
	MM	Conferred with court re hearing for application to access storage unit; reviewed and prepared docket matters re same; prepared correspondence to re	0.40 129.50/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
10/5/2018	SAM	Conferred with re	0.20 395.00/hr	No Charge
10/8/2018	SAM	Reviewed correspondence from D. Payne re discovery issues; conferred with M. Mauger re same; conferred with Dave Sawyer re the iPhone.	0.50 395.00/hr	197.50
	TJJ	Reviewed R. Kramer's production re possible motion to compel.	0.90 195.00/hr	175.50
	MM	Reviewed and organized production from R. Kramer; prepared summary of production; prepared correspondence to re	1.40 129.50/hr	181.30
	TJJ	Conferred with M. Mauger re R. Kramer's response to L. Silva's requests for production; conferred with re	0.90 195.00/hr	No Charge
	MM	Conferred with re	0.30 129.50/hr	No Charge
10/9/2018	TJJ	Prepared correspondence to D. Smith re cell phone and supplemental production.	0.30 195.00/hr	58.50
	MM	Conferred with cell phone analyst re A. Daoud's cell phone and information from same; prepared acknowledgment of receipt of cell phone.	0.80 129.50/hr	103.60
	TJJ	Conferred with re	0.20 195.00/hr	No Charge
	MM	Conferred with re	0.30 129.50/hr	No Charge
10/10/2018	EJW	Reviewed D. Payne's request for supplemental invoices; prepared same; prepared correspondence to the court and counsel re October 11 hearing issues;	0.90 250.00/hr	225.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		reviewed correspondence from re		
10/10/2018	MM	Updated litigation index re reporter's certificate for L. Silvas deposition; conferred with K. Helm re discovery binders; conferred with E. Wyatt re hearing for application to access storage unit.	0.60 129.50/hr	No Charge
	KGH	Reviewed and organized documents for the trial binders.	0.50 129.50/hr	No Charge
10/11/2018	EJW	Reviewed R. Kramer's production; updated file memo.	1.50 250.00/hr	375.00
	EJW	Conferred with M. Mauger re work assignments for supplemental production; revised fourth supplemental responses to first and second requests for production.	0.60 250.00/hr	No Charge
	EJW	Reviewed R. Kramer's response to no-evidence motion for motions for summary judgment; reviewed multiple correspondence from and prepared multiple correspondence to L. Silvas re harassment of Kroger employees by opposing counsel; update file memo re reply to response.	1.00 250.00/hr	250.00
	KGH	Reviewed and organized documents for the trial binders.	3.00 129.50/hr	No Charge
	MM	Conferred with K. Helm re litigation and production binders; updated litigation index re response to first amended motion for summary judgment.	0.50 129.50/hr	No Charge
	MM	Prepared invoices for production.	1.00 129.50/hr	No Charge
10/12/2018	EJW	Conferred with re	0.20 250.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
10/12/2018	EJW	Conferred with D. Dykes re decedent's cell phone; prepared multiple correspondence to and reviewed correspondence from counsel re same; met with D. Dykes re same and execution of acknowledgment of pickup of same.	0.80 250.00/hr	200.00
	EJW	Finalized and served fourth supplemental responses to requests for production.	0.20 250.00/hr	No Charge
	TJJ	Conferred with S. Padua re producing cell phone data; reviewed correspondence from S. Padua re same.	0.40 195.00/hr	No Charge
	SAM	Conferred with re	0.30 395.00/hr	No Charge
10/15/2018	KGH	Reviewed and organized documents for the trial binders.	1.50 129.50/hr	No Charge
	EJW	Reviewed response to no evidence motions for summary judgment; reviewed R. Kramer's and H. Wills' responses to discovery requests; prepared reply to same; reviewed authorities re reviewed discovery produced to date by the parties; prepared exhibits to same.	6.50 250.00/hr	1,625.00
10/16/2018	TJJ	Reviewed and revised reply to response to L. Silvas' no-evidence motion for summary judgment; conferred with re reviewed client documents re same; reviewed L. Silvas' deposition testimony re same.	1.50 195.00/hr	292.50
	TJJ	Reviewed and revised response to contestants' motion to access L. Silvas' storage unit; reviewed client documents re	0.50 195.00/hr	97.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		same.		
10/16/2018	SAM	Reviewed and revised L. Silvas' reply to plaintiff's response to L. Silvas' motion for summary judgment.	1.50 395.00/hr	592.50
	EJW	Revised, finalized, and filed reply to response to motions for summary judgment; finalized exhibits.	6.00 250.00/hr	1,500.00
	EJW	Conferred with at length re ; conferred with re	0.80 250.00/hr	No Charge
	EJW	Prepared response to motion for access to storage unit; reviewed correspondence from and prepared correspondence to I. Grady re same.	0.50 250.00/hr	125.00
	MM	Reviewed and revised response to motion for access to storage unit and reply to response to motions for summary judgment.	1.00 129.50/hr	No Charge
10/17/2018	EJW	Finalized and filed response to motion for access to storage unit with exhibits.	0.40 250.00/hr	100.00
	EJW	Prepared proposed orders granting in full no-evidence motions for summary judgment re Will contest, beneficiary designations, and conversion; prepared proposed orders granting in part no-evidence motions for summary judgment re Will contest, beneficiary designations, and conversion.	1.80 250.00/hr	450.00
	TJJ	Prepared proposed order regarding L. Silvas' first amended no evidence motion for summary judgment re Will contest; reviewed authorities re .	0.50 195.00/hr	97.50

			<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2018	KGH	Reviewed and organized documents for the trial binders.	4.00 129.50/hr	No Charge
	EJW	Conferred with J. Jennings re cell phone analysis; reviewed same.	0.50 250.00/hr	125.00
	MM	Prepared documents for hearing re amended motions for summary judgment and motion to access to storage unit; reviewed notices of intent to issue depositions by written questions.	0.80 129.50/hr	103.60
	EJW	Conferred with re	0.40 250.00/hr	No Charge
	MM	Updated litigation index re reply to response to motion for summary judgment.	0.20 129.50/hr	No Charge
10/18/2018	SAM	Conferred with re	0.20 395.00/hr	No Charge
	EJW	Prepared for, traveled to, attended, and returned from court re oral hearing on no evidence motions for summary judgment and motion for access to storage unit.	5.00 250.00/hr	1,250.00
	MM	Reviewed proposed orders for amended motions for summary judgment; updated litigation index re surreply to reply to response to amended motions for summary judgment.	0.50 129.50/hr	64.75
10/19/2018	TJJ	Prepared proposed jury questions; reviewed authorities re conferred with re	2.00 195.00/hr	390.00
	EJW	Conferred with re	0.40 250.00/hr	No Charge

				<u>Hrs/Rate</u>	<u>Amount</u>
10/19/2018	EJW	Conferred with	re	0.50 250.00/hr	No Charge
	MM	Updated litigation index re notice of delivery for Memorial Hermann's deposition by written questions; updated deposition by written question index; reviewed all deposition by written question notices.		0.40 129.50/hr	No Charge
10/22/2018	EJW	Prepared correspondence to ; conferred with	re re	0.70 250.00/hr	No Charge
	TJJ	Prepared proposed jury questions; reviewed authorities re ; conferred with	re	1.00 195.00/hr	195.00
	SAM	Conferred with	re	0.30 395.00/hr	118.50
10/23/2018	EJW	Conferred with	re	0.20 250.00/hr	No Charge
	SAM	Conferred with re		0.20 395.00/hr	No Charge
	TJJ	Conferred with re prepared correspondence to	re	0.20 195.00/hr	No Charge
	MM	Conferred with court clerk re status of proposed orders for amended motions for summary judgment and motion for access to storage unit.		0.20 129.50/hr	No Charge
10/24/2018	EJW	Revised proposed jury questions; conferred with re		1.00 250.00/hr	250.00
	TJJ	Conferred with	re	0.50 195.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
10/24/2018	MM	Conferred with James from Digital Forensics re cell phone data; prepared correspondence to updated litigation index re notice of intent to issue deposition by written questions to Houston Police Department; reviewed and revised proposed jury questions.	0.40 129.50/hr	51.80
	TJJ	Reviewed videos of decedent and notes re jury questions.	1.00 195.00/hr	195.00
10/25/2018	EJW	Reviewed order for mediation; prepared correspondence to re prepared correspondence to counsel and mediator re same; prepared correspondence to and reviewed correspondence from J. Jennings re cell phone analysis phase II; update file memo re trial deadlines.	0.70 250.00/hr	175.00
	EJW	Conferred with re	0.40 250.00/hr	No Charge
	TJJ	Conferred with re	0.30 195.00/hr	No Charge
	MM	Prepared correspondence to and reviewed correspondence from re	0.30 129.50/hr	No Charge
	EJW	Reviewed excerpts of notary's deposition.	0.50 250.00/hr	125.00
10/26/2018	EJW	Prepared written statement of contentions, statement of contested issues, and agreed stipulations; revised proposed jury charge; reviewed proposed motion in limine.	2.00 250.00/hr	500.00
	EJW	Conferred with re	0.50 250.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
10/26/2018	TJJ	Reviewed and revised L. Silvas' contested issues of fact and written statement of contentions; conferred with re	0.60 195.00/hr	117.00
	MM	Updated litigation index re notice of intent to issue deposition by written questions to Houston Methodist Physician's Organization; reviewed and prepared docket matters deadline for response to same; updated litigation index re orders denying first amended motions for summary judgment.	0.40 129.50/hr	51.80
	EJW	Reviewed motion to suppress deposition corrections; prepared response to motion to suppress deposition corrections.	0.80 250.00/hr	200.00
10/29/2018	EJW	Conferred with re	0.30 250.00/hr	No Charge
	EJW	Finalized and filed proposed jury charge, contested issues of fact, agreed stipulations, motion in limine, and L. Silvas' contentions; prepared proposed exhibit list.	2.50 250.00/hr	625.00
	MM	Updated litigation index re motion to quash deposition of Houston Police Department and notice of delivery for TD Ameritrade; reviewed and revised proposed jury questions, motions in limine, agreed stipulations, contentions, and contested issues; conferred with Encase Legal representative re depositions by written questions and waivers for same.	1.00 129.50/hr	129.50
	TJJ	Conferred with re	0.40 195.00/hr	78.00
	EJW	Reviewed correspondence from and prepared correspondence to D. Payne re S. Phillips' appearance; reviewed correspondence from	0.40 250.00/hr	100.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		S. Padua re storage unit.		
10/29/2018	EJW	Prepared mediation memo	0.90 250.00/hr	225.00
	EJW	Conferred with .	0.50 250.00/hr	No Charge
10/30/2018	EJW	Conferred with ; prepared correspondence to re ; prepared correspondence to and reviewed correspondence from J. Masson re testimony for trial; prepared correspondence to and reviewed correspondence from counsel re mediation.	0.50 250.00/hr	125.00
	EJW	Prepared correspondence to re ; prepared correspondence to re	0.20 250.00/hr	50.00
	MM	Updated litigation index re pretrial documents.	0.20 129.50/hr	No Charge
	EJW	Revised mediation memo; revised response to motion to suppress deposition corrections.	1.10 250.00/hr	275.00
	EJW	Reviewed authorities re prepared file memo re organized potential exhibits for L. Silvas' arguments; reviewed notary deposition excerpts; prepared file memo re	2.90 250.00/hr	725.00
	TJJ	Conferred with re ; conferred with re	0.60 195.00/hr	No Charge
	TJJ	Reviewed and revised memo to Judge Woodridge re mediation; conferred with re .	0.40 195.00/hr	78.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/30/2018	KGH	Reviewed and organized documents for the trial binders.	1.00 129.50/hr	No Charge
	TJJ	Prepared L. Silvas' exhibit list; reviewed document production re same; prepared exhibits re same.	2.10 195.00/hr	409.50
	TJJ	Reviewed authorities re	0.60 195.00/hr	No Charge
10/31/2018	EJW	Conferred with re	0.60 250.00/hr	150.00
	EJW	Reviewed opposing party's stipulations, contentions, contested fact issues, and motion in limine; reviewed opposing party's motion for leave to extend discovery period; conferred with S. Rosas re notary log review; traveled to, met with, and returned from S. Rosas' office re same.	3.00 250.00/hr	750.00
	EJW	Conferred with re	0.20 250.00/hr	No Charge
	MM	Updated litigation index re opposing counsel's pretrial documents, motion for leave to extend discovery period, and motion to permit telephonic testimony; reviewed and prepared docket matters re hearing for same.	0.40 129.50/hr	No Charge
	TJJ	Conferred with re reviewed authorities re	0.50 195.00/hr	97.50
11/1/2018	EJW	Prepared for and met with re	2.50 250.00/hr	625.00

			<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2018	EJW	Conferred with re	0.50 250.00/hr	No Charge
	EJW	Revised responses to suppression of deposition changes, telephonic testimony, and extension of discovery period.	1.00 250.00/hr	250.00
	EJW	Revised memo re	0.40 250.00/hr	100.00
	MM	Updated litigation index re jury charge and amended responses to requests for disclosure and requests for production; conferred with K. Helm re discovery and litigation binders.	0.30 129.50/hr	No Charge
	TJJ	Conferred with re reviewed and revised L. Silvas' response to plaintiffs' motion to suppress deposition changes.	1.20 195.00/hr	234.00
	KGH	Reviewed and organized documents for the trial binders.	2.30 129.50/hr	No Charge
	MM	Revised response to motion for leave to extend discovery period.	0.20 129.50/hr	25.90
11/2/2018	SAM	Conferred with re ; reviewed and revised same.	0.40 395.00/hr	158.00
	EJW	Finalized and filed responses to motion to suppress deposition changes with exhibits and motion to extend discovery period; finalized and filed response motion to permit telephonic testimony.	2.20 250.00/hr	550.00
	EJW	Prepared correspondence to court re hearing on motions to quash deposition notices.	0.10 250.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2018	EJW	Reviewed authorities re conferred with re	0.60 250.00/hr	150.00
	MM	Conferred with court clerk re hearing re motion to quash depositions by written questions of Houston Police Department and Houston Methodist Physicians Organization; prepared correspondence to court clerk re same; prepared notice of hearing for same; reviewed and revised mediation memo; prepared, reviewed, and organized exhibits for same; reviewed Colorado County property records re affidavits of heirship; filed response to motion for leave to extend time of discovery period, response to motion to suppress deposition changes, and response to motion for telephonic testimony; conferred with re	1.00 129.50/hr	129.50
	TJJ	Prepared L. Silvas' exhibit list; prepared exhibits re same.	0.70 195.00/hr	136.50
	TJJ	Reviewed response to contestants' motion for leave to extend discovery period; conferred with re	0.40 195.00/hr	No Charge
	TJJ	Conferred with re conferred with re	0.60 195.00/hr	No Charge
11/5/2018	TJJ	Prepared L. Silvas' exhibit list; reviewed document production re same; prepared exhibits re	0.60 195.00/hr	117.00
	TJJ	Reviewed authorities r	0.40 195.00/hr	No Charge
	SAM	Conferred several times with re reviewed multiple correspondence from and prepared multiple	0.60 395.00/hr	237.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		correspondence to E. Wyatt re same.		
11/5/2018	EJW	Traveled to, attended, and returned from mediation.	8.00 250.00/hr	2,000.00
	EJW	Traveled to, attended, and returned from mediation.	2.00 250.00/hr	No Charge
	MM	Updated litigation index; conferred with E. Wyatt multiple times re t; reviewed invoices.	0.50 129.50/hr	No Charge
11/6/2018	EJW	Updated file re settlement agreement and outstanding issues to complete same; conferred with attorneys and staff re outcome of mediation.	0.50 250.00/hr	No Charge
11/7/2018	EJW	Conferred with the court re pre-trial setting; reviewed correspondence from D. Smith re cancellation of same; conferred with K. Graham re temporary administrator fees.	0.30 250.00/hr	No Charge
11/8/2018	EJW	Reviewed and revised proposed agreed motions and orders; reviewed motion and order to approve settlement; conferred with ; prepared correspondence to and reviewed correspondence from counsel re same; reviewed K. Graham's application for fees and final accounting.	1.00 250.00/hr	250.00
	MM	Updated litigation index.	0.10 129.50/hr	No Charge
	SAM	Conferred with re	0.30 395.00/hr	No Charge
11/9/2018	EJW	Prepared for, traveled to, attended, and returned from court re oral hearing on settlement announcement, non-suit of claims, dissolution of temporary injunction, and closure of temporary administration.	1.00 250.00/hr	250.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/9/2018	MM Updated litigation index.	0.20 129.50/hr	No Charge
11/10/2018	SAM Reviewed the file re outstanding issues.	0.20 395.00/hr	No Charge
11/12/2018	EJW Updated litigation index; conferred with M. Mauger re work assignments; prepared correspondence to L. Silvas re meeting.	0.20 250.00/hr	No Charge
	MM Prepared correspondence to county clerk re request for certified copies.	0.30 129.50/hr	No Charge
	MM Updated litigation index re notice of delivery for Dr. Mehta records.	0.10 129.50/hr	No Charge
	Subtotal For Professional Services	140.40	\$23,224.15
	Summary of Expenses		
	Faxes		3.40
	Filing Fees		31.90
	Other Professional Expenses		200.00
	Travel & Parking		13.60
	Subtotal For Expenses		\$248.90
	Subtotal For Professional Services	140.40	\$23,473.05
	Total Amount Of This Bill		\$23,473.05
	Previous Balance		\$45,000.33
11/12/2018	Retainer applied to invoice -- thank you.		(\$5,000.00)
11/14/2018	One-Time Courtesy Credit.		(\$13,473.38)

The firm accepts personal checks, cashier's checks, money orders, wire transfers, American Express, MasterCard, Visa, and Paypal. For more information, please call our office or email minh@mendellawfirm.com for further details.

	<u>Amount</u>
Total payments and adjustments	<u>(\$18,473.38)</u>
Balance due	<u><u>\$50,000.00</u></u>

Unofficial Copy Office of Marilyn Burgess District Clerk

The Mendel Law Firm, L.P.

Attorneys & Counselors

1155 Dairy Ashford, Suite 104

Houston, TX 77079

Tel: 281-759-3213

Fax: 281-759-3214

Lucia Silvas
7543 Brush Wood Drive
Houston, TX 77088

April 1, 2019

In Reference To: C.A. No. 463306; *Estate of Abdulwahid H. Daoud, Deceased*; In
Probate Court No. One (1) of Harris County, Texas.

Invoice No. 24286

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
10/31/2018	EJW	Prepared correspondence to re	0.30 250.00/hr	75.00
	EJW	Prepared correspondence to and reviewed correspondence from L. Silvas re meeting at Prosperity Bank; conferred with K. Helm re work assignments for certified orders.	0.70 250.00/hr	175.00
	EJW	Conferred with S. Mendel re death certificate issues.	0.20 250.00/hr	No Charge
	EJW	Conferred with re	0.20 250.00/hr	No Charge
	MT	Prepared correspondence to opposing counsel re death certificate for Prosperity Bank; conferred with re	0.20 129.50/hr	25.90

The firm accepts checks, money orders, credit cards, and electronic payments. For electronic payment, please go to our website www.mendellawfirm.com and select "Make Payment".

			<u>Hrs/Rate</u>	<u>Amount</u>
10/31/2018	MT	Reviewed procedure for obtaining death certificates.	0.30 129.50/hr	38.85
	EJW	Prepared correspondence to and reviewed correspondence from counsel re death certificate for A. Daoud.	0.20 250.00/hr	50.00
	EJW	Traveled to, attended, and returned from meeting with L. Silvas at Prosperity Bank re closure of accounts per settlement; conferred with M. Mauger re work assignments; prepared correspondence to counsel re necessity of death certificate.	1.00 250.00/hr	250.00
	SAM	Conferred with E. Wyatt re problems with getting a death certificate for the Prosperity accounts; reviewed authorities re same.	0.20 395.00/hr	79.00
12/11/2018	MT	Prepared correspondence to opposing counsel re death certificate.	0.10 129.50/hr	12.95
12/12/2018	MT	Reviewed mediation settlement agreement.	0.30 129.50/hr	38.85
	EJW	Prepared correspondence to and reviewed correspondence from L. Silvas re mediated settlement agreement; conferred with M. Mauger re same.	0.30 250.00/hr	75.00
12/13/2018	MT	Conferred with re	0.10 129.50/hr	No Charge
	ML	Conferred with L. Silvas re fee and invoice issues; conferred with E. Wyatt re same; prepared file memo re same.	0.60 129.50/hr	No Charge
	EJW	Reviewed correspondence from and prepared correspondence to M. Harry re death certificate.	0.20 250.00/hr	No Charge

			<u>Hrs/Rate</u>	<u>Amount</u>
12/18/2018	EJW	Reviewed correspondence from and prepared correspondence to S. Padua re death certificate; conferred with S. Padua re same; traveled to, attended, and returned from meeting with R. Kramer and L. Silvas at Prosperity Bank and Woodforest Bank re closure of decedent's accounts.	5.00 250.00/hr	1,250.00
12/27/2018	EJW	Conferred with re	0.20 250.00/hr	No Charge
	SAM	Conferred with re	0.20 395.00/hr	No Charge
12/28/2018	TJJ	Prepared motion to withdraw; prepared proposed order re same.	1.00 195.00/hr	195.00
12/31/2018	MT	Updated litigation index re motion to withdraw.	0.10 129.50/hr	No Charge
1/8/2019	SAM	Conferred with the State Bar re production of the file; prepared file memo re same.	0.20 395.00/hr	79.00
1/9/2019	MT	Finalized correspondence to L. Silvas re requested documents and outstanding invoice.	0.40 129.50/hr	51.80
	EJW	Reviewed file re L. Silvas' request for production of file; prepared correspondence to L. Silvas re same.	0.70 250.00/hr	175.00
1/31/2019	MT	Prepared correspondence to court coordinator re hearing for motion to withdraw as counsel.	0.20 129.50/hr	25.90
2/1/2019	MT	Conferred with court clerk re hearing for motion to withdraw; reviewed and prepared docket matters re same.	0.20 129.50/hr	25.90
2/4/2019	MT	Conferred with court re hearing for motion to withdraw; prepared notice of hearing for same; prepared correspondence to L. Silvas	0.90 129.50/hr	116.55

			<u>Hrs/Rate</u>	<u>Amount</u>
		re notice of hearing and motion to withdraw; filed notice of hearing; updated litigation index re same.		
2/4/2019	EJW	Finalized notice of hearing re withdrawal; conferred with re	0.30 250.00/hr	75.00
2/7/2019	SAM	Conferred with re	0.30 395.00/hr	118.50
2/15/2019	EJW	Conferred with S. Padua re withdrawal hearing on February 21.	0.10 250.00/hr	25.00
2/18/2019	EJW	Conferred with S. Padua re February 21 hearing re withdrawal.	0.10 250.00/hr	25.00
2/20/2019	EJW	Reviewed motion to withdraw and prepared for hearing re same.	0.60 250.00/hr	150.00
2/21/2019	EJW	Prepared for, traveled to, attended, and returned from court re oral hearing on motion to withdraw as counsel.	3.00 250.00/hr	750.00
2/28/2019	MT	Updated litigation index re order approving motion to withdraw.	0.10 129.50/hr	12.95
3/22/2019	JM	Reviewed and paid Infinity Reporting Services invoice.	0.20 129.50/hr	25.90
Subtotal For Professional Services			18.70	\$3,922.05

Summary of Expenses

				Amount
Copies				29.96
Filing Fees				2.06
Local Counsel				8,500.00
Postage				24.90
Trial Transcripts				564.00
Subtotal For Expenses				<u>\$9,120.92</u>
Subtotal For Professional Services		18.70		<u>\$13,042.97</u>
Total Amount Of This Bill				<u>\$13,042.97</u>
Previous Balance				\$50,000.00
2/28/2019 Invoice for one-time courtesy credit previously issued on November 14, 2018, if full payment was received.				\$13,473.38
Total payments and adjustments				<u>\$13,473.38</u>
Balance due				<u><u>\$76,516.35</u></u>
Current	30 Days	60 Days	90 Days	120 Days
13,042.97	13,473.38	0.00	0.00	50,000.00

The firm accepts checks, money orders, credit cards, and electronic payments. For electronic payment, please go to our website www.mendellawfirm.com and select "Make Payment".

THE MENDEL LAW FIRM, L.P.

Attorneys & Counselors
1155 Dairy Ashford, Suite 104
Houston, TX 77079
Tel: 281-759-3213
Fax: 281-759-3214

EXHIBIT 3

Lucia Silvas
7543 Brush Wood Drive
Houston, TX 77088

October 03, 2022

In Reference C.A. No. 463306; *Estate of Abdulwahid H. Daoud*,
To: *Deceased*; In Probate Court No. One (1) of Harris County,
Texas.

Date	Description	Amount	Balance
1/31/2018	Invoice No.23370	1,502.60	1,502.60
2/19/2018	Invoice No.23436	1,186.35	2,688.95
2/27/2018	Payment applied to invoice -- thank you.		
	To: Invoice No.23436	(1,186.35)	1,502.60
	To: Invoice No.23370	(1,502.60)	0.00
2/28/2018	Payment applied to invoice -- thank you.		
	To: Invoice No.23466	(311.05)	(311.05)
2/28/2018	Invoice No.23466	3,190.30	2,879.25
3/21/2018	Invoice No.23518	7,357.01	10,236.26
3/21/2018	Invoice No.23519	2,519.33	12,755.59
4/20/2018	Invoice No.23622	1,104.41	13,860.00
6/5/2018	Invoice No.23685	5,816.89	19,676.89
6/5/2018	Invoice No.23686	8,389.09	28,065.98
6/20/2018	Payment applied to invoice -- thank you.		
	To: Invoice No.23466	(1,200.00)	26,865.98
7/9/2018	Invoice No.23778	4,213.45	31,079.43
8/14/2018	Invoice No.23874	1,361.17	32,440.60
9/12/2018	Invoice No.23943	7,414.10	39,854.70
9/17/2018	Payment applied to invoice -- thank you.		
	To: Invoice No.23466	(1,501.00)	38,353.70
10/25/2018	Invoice No.24054	6,646.63	45,000.33
11/12/2018	Retainer applied to invoice -- thank you.		
	To: Invoice No.23518	(4,821.75)	40,178.58
	To: Invoice No.23466	(178.25)	40,000.33
11/14/2018	One-Time Courtesy Credit.		

Date	Description	Amount	Balance
	To: Invoice No.23685	(5,816.89)	34,183.44
	To: Invoice No.23519	(2,519.33)	31,664.11
	To: Invoice No.23518	(2,535.26)	29,128.85
	To: Invoice No.23686	(1,497.49)	27,631.36
	To: Invoice No.23622	(1,104.41)	26,526.95
11/14/2018	Invoice No.24069	23,473.05	50,000.00
2/28/2019	Invoice No.24201	13,473.38	63,473.38
4/1/2019	Invoice No.24286	13,042.97	76,516.35
	Ending Balance		76,516.35
	Amount Due		76,516.35

Current	30 Days	60 Days	90 Days	120+ Days
0.00	0.00	0.00	0.00	76,516.35

Probate

EXHIBIT 4

Case Number

Court

Status

File Date (From)

File Date (To)

SEARCH

CLEAR

☒ Party
☐ Attorney
☐ Company

Last Name

First Name

Bar Card Number

File Date (From)

File Date (To)

SEARCH

CLEAR

Case	File Date	Type Desc	Subtype	Style	Status	Judge	Court	View All
463306	01/03/2018	INDEPENDENT ADMINISTRATION	APP FOR INDEPENDENT ADMINISTRATION WITH WILL ANNEXED	IN THE ESTATE OF: ABDULWAHID H. DAOUD, DECEASED	Closed	JERRY SIMONEAUX	1	Parties Court Settings
Event Date	Event Desc	Comments	Pgs					
12/17/2019	Order on Inventory (Indep.)	This Instrument Returned Unsigned By Judge's Office	Order on Inventory (Indep.) 1					
12/09/2019	Inventory (Indep.)		Inventory Appraisement and List of Claims.pdf 2					
10/30/2019	Application of Miscellaneous kind	PLAINTIFFS MOTION TO EXPUNGE NOTICE OF LIS PENDENS	MOTION TO EXPUNGE NOTICE OF LIS PENDENS.pdf 13					
08/27/2019	Order of Termination of Issuance of Letters & Drop Order		Order of Termination of Issuance of Letters & Drop 1					
02/21/2019	Application to Withdraw as Attorney of Record		Application to Withdraw as Attorney of Record 1					
02/21/2019	Order to Withdraw as Attorney of Record	Ordered Stephen A. Mendel and Emily J. Wyatt be discharged as counsel	Order to Withdraw as Attorney of Record 1					
02/21/2019	Letter	Lucia Silvas	Letter 1					
02/04/2019	Notice of Hearing		2019-02-04 Ntc of Hrg.pdf 2					

12/28/2018	Proposed Order	Order Granting Motion to Withdraw by the Counsel for Lucia Silvas	2018-12-28 Mendel-Wyatt Ord to Wthdrw.pdf	1
12/28/2018	Application to Withdraw as Attorney of Record	Motion to Withdraw by Counsel For Lucia Silvas	2018-12-28 Mendel-Wyatt Mtn to Wthdrw.pdf	4
12/17/2018	Affidavit	of Check Disbursement; \$1,013.44	Affidavit	1
11/26/2018	Citation Returned	SERVED Posting Final Accounting	Citation Returned	2
11/13/2018	CC & Non-CC Order	Tag#376017---PICKED UP 11/13/18		
11/12/2018	Certificate of Deposition	\$213.00 - Darlene Payne Smith	463306.pdf	1
11/12/2018	Certificate of Deposition	\$152.75 charged to Attorney, Darlene Payne Smith	463306 .pdf	1
11/12/2018	Notice Letter-306-Judgment	Agreed Judgment Granting Declaratory Judgment Regarding Beneficiary Designations	Notice Letter - 355 Judgment	1
11/12/2018	CC & Non-CC Order	tag#375722---MAILED 11/12/18		
11/09/2018	Agreed Order	to Non-Suit and to Dissolve Temporary Injunction; Ordered the Agreed Temporary Injunction granted on 02/20/2018 is dissolved as to the Prosperity accounts and the county clerk shall release the \$1,000.00 cash bond plus interest to Rebeccra Seham Kramer and Hope Amal Clarisse Wills	Agreed Order	3
11/09/2018	Order to Close	Ordered Kerri Graham be discharged from this trust and as Principal on her Bond and this Temporary Administration is hereby closed	Order to Close	2
11/09/2018	Application to Close		Application to Close	1
11/09/2018	Order on Final Accounting (Dep.)		Order on Final Accounting (Dep.)	2
11/09/2018	Order to Pay Attorney Fees	Ordered the total amount of \$6,995.32 be paid to The Graham Law Group, PLLC, out of the funds belonging to the decedent's Estate	Order to Pay Attorney Fees	2
11/09/2018	Oath	Rebecca Seham Kramer; Independent Administrator with Will Annexed	Oath	1
11/09/2018	Order for Independent Administration with Will Annexed	Holographic Will dated 09/24/2017; Will dated 08/02/1982; Letters be granted to Rebecca Seham Kramer as Independent Administrator with Will Annexed without bond; Appraisers waived	Order for Independent Administration with Will Ann	3
11/09/2018	Admitted Will	To Probate	Admitted Will	1
11/09/2018	Denied Will	To Probate	Admitted Will	2
11/09/2018	Proof of Misc. Types	of Handwriting and Signature on Holographic Will; Jennifer Kay	Proof of Misc. Types	1
11/09/2018	Proof of Misc. Types	of Handwriting and Signature on Holographic Will; Jason Kramer	Proof of Misc. Types	1
11/09/2018	Proof of Death and Other Facts	Rebecca Seham Kramer	Proof of Death and Other Facts	2
11/09/2018	Application of Miscellaneous kind	Agreed Petition for Declaratory Judgment Regarding Beneficiary Designations	Application of Miscellaneous kind	5
11/09/2018	Order for Declaratory Judgment	Agreed; Ordered TD Ameritrade is authorized to release all funds in the Decedent's accounts to Rebecca Kramer	Order for Declaratory Judgment	3

11/09/2018	Order on Settlement Agreement		Order on Settlement Agreement	3
11/09/2018	Cert. of Ct Ord Authorizing Pymt of Funds From Reg of the Ct		Notice letter - Certificate on Court Order Auth Payment of Funds from the Registry of the Court	1
11/09/2018	Proposed Order	Order Closing Administration	Order Closing Administration_Daoud.pdf	2
11/09/2018	Application for Non Suit	Joint Motion to Non-Suit and Dissolve Temporary Injunction	Joint Motion to Non-Suit and Dissolve TI.pdf	4
			Agreed Order to Non-Suit and to Dissolve Temporary Injunction.pdf	3
11/09/2018	Application for Declaratory Judgment	Agreed Petition for Declaratory Judgment Regarding Beneficiary Designations	Agreed Petition for Declaratory Judgment.pdf	5
			Declaratory Judgment Exhibits.pdf	26
			Agreed Judgment Granting Declaratory Judgment.pdf	3
11/09/2018	Application to Close		Application to Close Administration_Daoud.pdf	1
11/09/2018	Final Account - Posting		Post - Final Account	1
11/08/2018	Certificate of Deposition	\$501.94 charged to Darlene Payne Smith	463306.pdf	1
11/08/2018	Proposed Order	Order on Application to Pay Attorney's Fees	Order to Pay Attorney's Fees _Daoud.pdf	2
11/08/2018	Proposed Order	Order on Final Accounting	Order on Final Accounting_Daoud.pdf	2
11/08/2018	Application to Pay Attorney Fees		Application to Pay Attorney's Fees _Daoud.pdf	16
11/08/2018	Final Accounting (Indep.)	Final Accounting	Final Accounting_Daoud.pdf	6
11/08/2018	Application to Compromise & Settle Claims	Motion to Approve Settlement Agreement	DAOUD - Motion to Approve Settlement Agreement.pdf	6
11/06/2018	Subpoena Returned	Return of Service	Return of Service	5
11/05/2018	Notice of Hearing		2018-11-05 Notice of Hearing for Pretrial Motions.pdf	2
11/05/2018	Proposed Order	Order Approving Second Amended Inventory, Appraisement & List of Claims	Order Approving Second Amended Inventory.pdf	1
11/02/2018	Subpoena Returned	Affidavit of Due Diligence	Affidavit of Due Diligence	5
11/02/2018	Response	Response to Motion to Permit Telephonic Testimony	2018-11-02 Resp to Mtn re Tele Tstmny.pdf	3
			2018-11-02 Prop Ord re Tele Tstmny.pdf	1
11/02/2018	Response	Response re Motion for Leave to Extend Discovery Period	2018-11-02 Resp to Mtn re Extnd Dscvry.pdf	5
			2018-11-02 Prop Ord re Mtn re Extnd Dscvry.pdf	1
11/02/2018	Response	Response to Motion to Suppress Depo Changes	2018-11-02 Resp to Mtn re Spprs Depo Chngs.pdf	6
			2018-11-02 Prop Ord Deny Spprs Depo Chngs.pdf	1
11/02/2018	Notice of Hearing	Notice of Hearing re Motion to Quash	2018-11-02 Ntc of Hrg.pdf	2
11/01/2018	Subpoena Returned	Return of Service	Return of Service	6
10/31/2018	Jury Questions and Instructions	Proposed Jury Charge of Rebecca Seham Kramer and Hope Amal Clarisse Wills	Plaintiff's Proposed Jury Charge.pdf	33

10/31/2018	Notice of Hearing	11/07/2018 at 1:30pm for Telephonic Testimony	Notice of Hearing for Telephonic Testimony.pdf	2
10/31/2018	Application of Miscellaneous kind	MOTION TO PERMIT TELEPHONIC TESTIMONY	Motion to Permit Telephonic Testimony - A. Daoud.pdf	4
			Order Granting Motion To Permit Telephonic Testimony.pdf	1
10/31/2018	Application for Leave of Court	Motion for Leave to Extend Discovery Period	Daoud Motion for Leave.pdf	48
			Daoud Order.pdf	2
10/31/2018	Notice of Hearing		DAOUD Notice of Hearing.pdf	2
10/30/2018	Issues of Fact	Contested Issues of Fact	Contested Issues of Fact.pdf	3
10/30/2018	Stipulations	Contestants' Written Statement of Stipulations	Contestants' Written Stipulations.pdf	2
10/30/2018	Contentions	Contestants' Written Statement of Contentions	Written Statement of Contentions.pdf	3
10/30/2018	Application in Limine		Daoud Motion in Limine and Order.pdf	20
10/29/2018	Jury Charge	Lucia Silvas' Proposed Jury Charge	2018-10-29 Jury Questions.pdf	17
10/29/2018	Application in Limine		2018-10-29 Mtn in Limine.pdf	4
			2018-10-29 Prop Ord re Mtn in Limine.pdf	3
10/29/2018	Contentions	Lucia Silvas' Written Statement of Contentions	2018-10-29 Contentions.pdf	5
10/29/2018	Issues of Fact	Lucia Silvas' Contested Issues of Fact	2018-10-29 Cntstd Fact Iss.pdf	3
10/29/2018	Stipulations	Lucia Silvas' Written Stipulations	2018-10-29 Stpltns.pdf	2
10/29/2018	Application to Quash	Deposition of Houston Methodist Physician Organization	2018-10-29 Mtn to Quash re Methodist.pdf	4
10/29/2018	Court Letters	Judge Loyd H. Wright	Court Letters	2
10/29/2018	APPEARANCE	Syd Phillips on behalf of Lucia Silvas	Notice of Appearance (Syd Phillips).pdf	2
10/29/2018	Certificate of Deposition	\$504.25 charged to Darlene Payne Smith	463306.pdf	1
10/26/2018	Application to Quash	Motion to Quash Deposition Notice of HPD	2018-10-26 Mtn to Quash re HPD.pdf	4
10/26/2018	Misc. Notice	Notice of Intent to Take DWQ with Subpoena Duces Tecum to Houston Methodist Physician Organization	DWQ - Houston Methodist Physican Organization.pdf	12
10/26/2018	Court Letters	Judge Loyd H. Wright	Court Letters	2
10/25/2018	Order for a Mediator	Ordered Judge John T. Woolridge be appointed as Mediator.	Order for a Mediator	2
10/24/2018	Miscellaneous Order	Denying First Amended No-Evidence Motion for Summary Judgment Regarding Will Contest	Miscellaneous Order	2
10/24/2018	Miscellaneous Order	Denying First Amended No-Evidence Motion for Summary Judgment Regarding Beneficiary Designations and Conversion	Miscellaneous Order	1
10/24/2018	Miscellaneous Order	Granting Motion for Access to Defendant's Storage Unit	Miscellaneous Order	1

10/24/2018	No Fee - Other	Motion for Suppression of Attempted Changes to Deposition Testimony by Lucia Silvas	Motion to Suppress LS Deposition Changes.pdf	5
			Exhibits to Motion for Suppresion.pdf	20
			Order Granting Motion for Suppression.pdf	2
10/24/2018	Notice of Intention to Take Written Deposition	with Subpoena Duces Tecum to Houston Police Department	DWQ to HPD.pdf	12
10/19/2018	Certificate of Deposition	\$183.55 charged to Darlene Payne Smith	463306.pdf	1
10/19/2018	Certificate of Deposition	\$112.25 charged to Darlene PAYne Smith	463306.pdf	1
10/19/2018	Certificate of Deposition	\$102.00 Darlene Payne Smith	463306.pdf	1
10/19/2018	Certificate of Deposition	\$100.00 charged to Darlene Payne Smith	463306.pdf	1
10/18/2018	Response	Plaintiff's Surreply to Reply to Response to First Amended No-Evidence Motion for Summary Judgment Regarding Will Contest and First Amended No-Evidence Motion for Summary Judgment Regarding Beneficiary Designations and Conversion	Daoud Surreply.pdf	5
10/17/2018	Response	to Motion for Access to Storage Unit	2018-10-17 Resp to Mtn re Strg Unit.pdf	10
			2018-10-17 Prop Ord re Strg Unit.pdf	1
10/16/2018	Misc. Notice	Notice of Change in Firm Affiliation	Notice of Change in Firm Affiliation.pdf	2
10/16/2018	Response	Reply to Response to Silvas' Motions for Summary Judgment	2018-10-16 Rply to MSJ Resp.pdf	19
			Contestants Exhbts.pdf	19
			Silvas Exhbts.pdf	74
10/12/2018	Notice of Hearing	10/18/2018 at 2pm on Motion for Access to Defendant's Storage Unit	Notice of Hearing Motion for Access.pdf	2
			Notice of Hearing Motion for Access.pdf	2
10/11/2018	Proposed Order	Order Denying First Amended No-Evidence Motion for Summary Judgment Regarding Will Contest	Daoud Order Will Contest.pdf	2
10/11/2018	Proposed Order	Order Denying First Amended No-Evidence Motion for Summary Judgment Regarding Beneficiary Designation and Conversion	Daoud Order Beneficiary Designations.pdf	2
10/11/2018	Response	Plaintiff's Response to First Amended No-Evidence Motion for Summary Judgment Regarding Will Contest and First Amended No-Evidence Motion for Summary Judgment Regarding Beneficiary Designations and Conversion	Daoud Response to SJ.pdf	90
10/09/2018	Certificate of Deposition	Notice of Delivery \$1,189.65 charged to the Plaintiff's	REPORTERS CERTIFICATE ORAL DEPOSITION OF LUCIA SIVAS SEPTEMBER 7, 2018.pdf	20
10/08/2018	Certificate of Deposition	Notice of Delivery \$166.00 charge to Darlene Payne Smith	463306.pdf	1
10/08/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Dr. Sria Durayappah	Notice of Intent to Take DWQ - Dr. Durayappah Family Care.pdf	12

10/04/2018	Application of Miscellaneous kind	MOTION FOR ACCESS TO DEFENDANT S STORAGE UNIT	Motion for Access to Storage Unit (Kramer-Daoud) PLF 1042018.pdf	4
			Order Granting Motion for Access to Storage Unit PLF.pdf	1
09/27/2018	Notice of Hearing	10/08/2018 at 2pm on 1st Amended No Evidence Motion for Summary Judgment regarding Decedent's Beneficiary Designations & Conversion and 1st Amended No Evidence Motion for Summary Judgment regarding the Will Contest	2018-09-27 Ntc of Hrg re 1st Amnd MSJs.pdf	2
09/27/2018	Motion for Summary Judgment	Lucia Silvas' 1st Amended No Evidence Motion to Summary Judgment Regarding Decedent's Deneficiary Designations & Conversion	2018-09-27 1st Amnd No Evid MSJ - ROD & Cnvrnsn.pdf	5
09/27/2018	Motion for Summary Judgment	Lucia Silvas' 1st Amended No Evidence Motion for Summary Judgment Regarding the Will Contest	2018-09-27 1st Amnd No Evid MSJ - Will.pdf	5
09/25/2018	Certificate of Deposition	\$86.50 is the charge for preparation of the Deposition to attorney Darlene Payne Smith	463306.pdf	1
09/07/2018	Amended	Second Amended Inventory, Appraisement and List of Claims	Second Amended Inventory_Redacted.pdf	4
09/07/2018	Amended	First Amended Inventory, Appraisement and List of Claims	First Amended Inventory_Daoud_Redacted.pdf	4
09/04/2018	Misc. Notice	Notice of Intent to Take Deposition on Written Questions with Supoena Duces Tecum to TD Ameritrade Inc.	Notice of Intent to Take DWQ - Prosperity Bancshares Inc.pdf	13
			Notice of Intent to Take DWQ - TD Ameritrade Inc.pdf	13
09/04/2018	Demand for a Jury		Jury Demand.pdf	2
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Methodist Hospital	Daoud DWQ Methodist Hospital.pdf	12
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Memorial Hermann Health System	Daoud DWQ Memorial Herman Health System.pdf	12
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Home Health Recources	Daoud DWQ Home Health Resources.pdf	12
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to HEA Surgery Center	Daoud DWQ HEA Surgery Center.pdf	13
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Dr. Gary Sheppard and Southwest Memorial Physicians Associates, PA	Daoud DWQ Dr. Sheppard.pdf	12
08/30/2018	Misc. Notice	Notice of Intention to Take Deposition on Written Questions with Subpoena Duces Tecum to Dr. Navnit Metha, Village Family Practice	Daoud DWQ Dr. Navnit Village Family Practice.pdf	12
08/29/2018	Court Letters	Judge Loyd H. Wright	Court Letters	2
08/28/2018	Order for Continuance	Ordered continuance be set for 10/18/2018 at 2:00 P.M.	Order for Continuance	2

08/28/2018	Order to Quash	the Deposition	Order to Quash	1
08/28/2018	Order for Protective Order		Order for Protective Order	1
08/27/2018	Amended	Contestants' Second Amended Opposition to Application for Probate of Holographic Will, Issuance of Letters of Administration, Application for Injunctive Relief, and Petition for Declaratory Judgment and Damages	Daoud 2nd Amended.pdf	21
08/24/2018	Response	to Motion for Continuance	2018-08-24 Resp to Mtn re Cont.pdf	7
			Exh A - 2018-02-20 DCO.pdf	3
			Exh B - 2018-08-21 Ltr to Cnsl re Depo.pdf	4
08/23/2018	Motion For Protective Order	Motion for Protection	2018-08-23 Mtn re Prot Ord.pdf	14
08/23/2018	Application to Quash	Motion to Quash Deposition of Lucia Silvas	2018-08-23 Mtn to Quash.pdf	12
08/21/2018	Notice of Hearing	August 28th, 2018 at 10:00 AM set on Plaintiff's Motion for Continuance of Hearing on Defendant's Motions for Partial Summary Judgment	Daoud NOH.pdf	2
08/21/2018	Application for Continuance	Plaintiff's Motion for Continuance of Hearing on Defendant's Motions for Partial Summary Judgment	Daoud Mot. for Continaunce.pdf	10
			Daoud Order.pdf	2
08/13/2018	Citation Returned	Returned Served-Citation on Application for Authority for Sale of Real Property by Posting.	Citation Returned	4
08/06/2018	Motion for Summary Judgment	No Evidence Motion for Summary Judgment re Beneficiary Designation	2018-08-06 No Evid MSJ - POD.pdf	5
08/06/2018	Motion for Summary Judgment	No Evidence Motion for Summary Judgment re Will Contest	2018-08-06 No Evid MSJ - Will.pdf	4
08/06/2018	Objection	Objection to Temporary Administrator's Inventory	2018-08-06 Obj re Invntry.pdf	2
07/27/2018	Sell Real Property Posting		Post - Sale of Real Property	2
07/26/2018	Application to Sell Real Estate	Post, Return date 8-13-18	Application and Order Sale of REal Property.pdf	8
07/26/2018	Application to Expend Funds		Motion and Order to Expend Funds.pdf	3
07/26/2018	Inventory (Indep.)		Inventory with Order.pdf	6
07/17/2018	Amended	Plaintiff's First Amended Petition	Daoud Amended Petition.pdf	16
07/09/2018	Amended	Supplement to Designation of Expert Witnesses	DAOUDSUPP.pdf	4
07/05/2018	Designation	of Expert Witnesses	DAOUEXPRT.pdf	17
07/05/2018	Designation	of Experts	2018-07-05 Dsgntn re Experts.pdf	9
06/14/2018	Certificate of Deposition	charged to \$666.00 to Darlene Payne Smith	REPORTERS CERTIFICATION ORAL DEPOSITION OF SALVADOR GARCIA ROSAS MAY 30, 2018.pdf	3
05/08/2018	Subpoena Returned	Return of Service on Salvador Garcia Rosas	Daoud Return.pdf	3
05/07/2018	Citation Returned	Served-Citation on Application for Independent Administration with will annexed by Posting.	Citation Returned	2

05/01/2018	Waiver	Waiver and Consent to Independent Administration Pursuant to Texas Estates Code 401.003(A) and 401.005	Daoud Waiver.pdf	2
04/24/2018	Purported Will		Purported Will	1
04/24/2018	Independent Administration (WWA) Posting		Post - Independent Administration (WWA)	1
04/23/2018	Independent Administration with Will Annexed	Application for Probate of Will & For Letters of Independent Administration WWA post return date 05/07/2018	DAOUDAppl.pdf	5
03/23/2018	Notice to Creditors	Publishers Affidavit	Publishers Affidavit.pdf	1
03/23/2018	Rule 11 Agreement	2018-03-22 Rule 11 Agrmnt	2018-03-22 Rule 11 (sgnd).pdf	2
03/19/2018	Order to Substitute Attorney	Unopposed Motion; Ordered Jerrad D. Bloome, Alexandra Ledyard and Kami D'Olive are substituted as Counsel of Record with Darlene Payne Smith; Signed 03/19/2018	Order to Substitute Attorney	1
03/14/2018	Application to Substitute Attorney	Unopposed Motion	Motion for Substitution of Counsel - Daoud SP Revised.pdf	3
			Substitution of Counsel Order - Daoud.pdf	1
03/13/2018	CC & Non-CC Order	TAG#284182		
03/12/2018	Application to Substitute Attorney		Motion for Substitution of Counsel - Daoud.pdf	2
			Substitution of Counsel Order - Daoud.pdf	1
03/08/2018	Order Approving Bond	Bond No. 881875; Ordered Kerri Graham, Principal, and Merchants Bonding Company (Merchants), are held in the amount of \$125,000.00; Signed 03/08/2018	Order Approving Bond	3
03/07/2018	Misc. Notice	Notice Deposition Written Questions 11611 1-2	Notice Deposition Written Questions 11611 1-2.pdf	9
03/07/2018	Bond & Oath	\$125,000.00	Bond & Oath	3
03/02/2018	Court Letters	Judge Loyd H. Wright	Court Letters	2
03/01/2018	Order for Temporary Administration	Letters be granted to Kerri L. Graham as Temporary Administrator with Pendign Contest with a bond of \$125,000.00; Signed 03/01/2018	Order for Temporary Administration	2
03/01/2018	Miscellaneous Order	Denying Motion to Obtain Death Certificate; Signed 03/01/2018	Miscellaneous Order	1
03/01/2018	Miscellaneous Order	Denying Motion to Obtain Death Certificate; Signed 03/01/2018	Miscellaneous Order	1
02/26/2018	Application of Miscellaneous kind	Motion to Obtain Death Certificate	2018-02-26 Mtn re Death Cert.pdf	4
			Proposed Order Granting Mtg for Death Certif.pdf	1
02/26/2018	Response	& Objection to Temporary Administration	2018-02-26 Resp to Temp Admin.pdf	5
			Proposed Order Denying Temp. Admin.pdf	1
02/21/2018	Court Letters	Kimberly Hightower; Judge Loyd H. Wright	Court Letters	2
02/21/2018	Citation Returned	Unserved Serve Instantanr Writ for Temporary Restraining Order	Citation Returned	4

02/20/2018	Docket Control Order	Signed 02/20/2018	Docket Control Order	4
02/20/2018	Notice of Hearing	March 1, 2018 at 10:00 am	Notice of Hearing (1420488x7ACE3).pdf	2
02/20/2018	Subpoena Returned	Lucia Silvas	Lucia Silva.pdf	3
02/20/2018	Temporary Restraining Order	- order not entered	2018-02-19 Agrd Temp Injnctn (sgnd).pdf	4
02/19/2018	Order for Temporary Injunction	Agreed; Signed 02/19/2018	Order for Temporary Injunction	4
02/19/2018	Annual Accounting (Indep.) (No Fee)	Lucia Silvas' Accounting	2018-02-17 Accounting.pdf	4
02/19/2018	Response	Response to Application for Temporary Injunction	2018-02-17 Resp to App re Temp Inj.pdf	7
			Exh A - Facts of Death-R.pdf	2
			Exh B - Temp Restraining Ord (sgnd).pdf	4
02/19/2018	Answer	Lucia Silvas' Original Answer	2018-02-16 Ans.pdf	2
02/09/2018	Court Letters	Judge Loyd H. Wright	Court Letters	2
02/09/2018	Temporary Restraining Order Serve Instantner - Writ	Lucia Silva, 7543 Brush Wood, Hou., Tx	Writ - Temporary Restraining Order Serve Instantner	1
02/09/2018	Temporary Restraining Order Bond		Bond - Temporary Restraining Order	1
			Temporary Restraining Order Bond	1
02/08/2018	Temporary Restraining Order	Signed 02/08/2018	Temporary Restraining Order	2
02/07/2018	Request	Correspondence to Clerk regarding service 1 Pers by In (Lucia Silva)	Clk Ltr encl Original Petition, Req for TRO (1414514x7ACE3).pdf	1
02/07/2018	Miscellaneous Order	PROPOSED TEMPORARY RESTRAINING ORDER	Proposed Temp Restraining Order (1414194x7ACE3).pdf	2
02/07/2018	Application of Miscellaneous kind	PLAINTIFF'S ORIGINAL PETITION AND APPLICATION FOR INJUNCTIVE RELIEF 1 Pers by In (Lucia Silva)	Plaintiffs' Original Petition and Application for T.R.O. (1414515x7ACE3).pdf	12
02/06/2018	Application for Temporary Administration	APPLICATION FOR APPOINTMENT OF TEMPORARY ADMINISTRATOR PENDING CONTEST - No serv reqs	Application for Appointment of Temporary Administrator Pending Contest (1414197x7ACE3).pdf	4
01/22/2018	Citation Returned	SERVED Posting Supplemental In-Adm WWA	Citation Returned	2
01/05/2018	Contest to a Will (Indep.)	OPPOSITION TO APPLICATION FOR PROBATE OF WILL & ISSUANCE OF LETTERS OF ADMINISTRATION	In Re A Daoud Opposition to Application for Will.pdf	11
01/05/2018	Purported Will		Purported Will	2
01/05/2018	Amended	First Supplemental Application to Probate Will and For Issuance of Letters of Administration with Will Annexed	2018-01-05 1st Supp App.pdf	2
01/05/2018	Independent Administration (WWA) Posting	1st Suppl	Post - Independent Administration (WWA)	1
			Independent Administration (WWA) Posting	2
01/04/2018	Abstract of Notice		Abstract of Notice	1
01/04/2018	Independent Administration (WWA) Posting			
01/03/2018	Civil Case Information Sheet		2018-01-03 EJW Civil Case Info.pdf	1

01/03/2018 Case Initiated Application (OCA)

Pwlt, Post return date 1-22-18, DOD 12-27-17

2018-01-02 App to Prob Will (sgnd).pdf	4
2017-09-24 LWT.pdf	1

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