

CAUSE NO. 2022-11278

DIANE LOPEZ § **IN THE DISTRICT COURT OF**
v. § **HARRIS COUNTY, TEXAS**
THE BANK OF NEW YORK MELLON § **333rd JUDICIAL DISTRICT**

PLAINTIFF'S DESIGNATION OF EXPERTS

Diane Lopez hereby designates the following individuals as expert witnesses who may be called to testify at the time of trial of this matter pursuant to Texas Rule of Civil Procedure 195:

1. Identity of the expert witness:

Robert C. Vilt - JD, CPA
Vilt Law, P.C.
5177 Richmond Avenue, Suite 1142
Houston, Texas 77056
Telephone: 713.840.7570
Facsimile: 713.877.1827
Email: clay@viltlaw.com

2. Subject matter of expert testimony:

Mr. Vilt will provide testimony concerning the reasonableness of the attorneys' fees incurred by Diane Lopez to prepare and prosecute the instant lawsuit as well as in opposition to any legal fees claimed by the Defendant. Enclosed herewith is a copy of Mr. Vilt's current resume.

Diane Lopez designates any and all expert witnesses that have been designated by other parties.

Diane Lopez reserves the right to elicit any expert opinion or lay opinion testimony from any of the individuals previously identified by any other party as persons with knowledge of facts relevant to this proceeding, which testimony would be truthful, would be of benefit to the court and/or the jury determining the factual issues in this lawsuit, and which would not violate any existing Court order, the Texas Rules of Civil Procedure, or the Texas Rules of Evidence.

Diane Lopez also reserves the right to call as an expert witness any of the expert witnesses designated by any other party in this case. Diane Lopez further reserves the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alternations of same by subsequent Court order or agreement of the parties, or pursuant to the Texas Rules of Civil Procedure and/or the Texas Rules of Evidence.

Diane Lopez reserves the right to withdraw the designation of any expert and to aver that any such previously designated expert will not be called as a witness at trial, and to redesignate same as a consulting expert, who cannot be called by opposing counsel.

Respectfully submitted,

VILT LAW, P.C.

By: /s/ Robert C. Vilt
Robert C. Vilt
State Bar No. 00788586
Texas Bar No. 20296
Email: clay@viltlaw.com
5177 Richmond Avenue, Suite 1142
Houston, TX 77056
Telephone: 713.840.7570
Facsimile: 713.877.1827
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of December, 2022, a copy of the above has been forwarded to all parties and/or counsel of record by operation of the Court's electronic filing system and/or was sent by U.S. mail in accordance with the Rules 21 and 21a of the Texas Rules of Civil Procedure.

Braden Barnes
Jamie Silver
Rachel Donnelly
Bonial & Associates, P.C.
14841 Dallas Parkway, Suite 425
Dallas, TX 75254

/s/ Robert C. Vilt
Robert C. Vilt

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Joshua Bailey on behalf of Robert Vilt
Bar No. 788586
josh@viltlaw.com
Envelope ID: 70938192
Status as of 12/13/2022 8:08 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Nicolas Vilt		nicolas@viltlaw.com	12/12/2022 4:51:46 PM	SENT
Robert C. Vilt		clay@viltlaw.com	12/12/2022 4:51:46 PM	SENT
Braden Barnes		braden.barnes@bonialpc.com	12/12/2022 4:51:46 PM	SENT
Jamie Elizabeth Silver		jamie.silver@bonialpc.com	12/12/2022 4:51:46 PM	SENT
Rachel Underwood Donnelly		Rachel.Donnelly@BonialPC.com	12/12/2022 4:51:46 PM	SENT