

CAUSE NO. 2021-53589

TARWONIA ALBROW § IN THE DISTRICT COURT OF
v. § HARRIS COUNTY, TEXAS
SANDY ANN FORSYTHE; §
NEW MILLENIA PROPERTIES, LLC; §
JUSTINA DE PASQUALE, §
INDIVIDUALLY AND AS TRUSTEE §
FOR LOST THICKET TRUST AND §
ROBERT C. VILT § 157th JUDICIAL DISTRICT

AFFIDAVIT OF ROBERT C. VILT

STATE OF TEXAS §
COUNTY OF HARRIS § KNOW ALL MEN BY THESE PRESENTS
§

BEFORE ME, the undersigned authority, on this day personally appeared Robert C. Vilt, attorney for Robert C. Vilt. ("Defendant,") in the above-entitled and numbered cause, who, being first duly sworn by me, says and deposes as follows, to-wit:

1. "My name is Robert C. Vilt. I am an attorney and counselor at law duly admitted to practice in the State of Texas and before this Honorable Court. I have personal knowledge of all the facts stated in this Affidavit and am in all respects qualified to make the same. Further, I swear under penalty of perjury that the contents of this Affidavit are true and correct.

2. I maintain an office for the practice of law at 5177 Richmond Avenue, Suite 1142, Houston, TX 77056. I practice law in the State of Texas and have been admitted to practice in the State of Texas since November of 1993. I have been practicing law for almost 30 years and have litigated hundreds of civil and criminal cases including numerous cases like this one. I have testified as an expert in trial on the reasonableness and necessity of attorneys' fees.

3. My firm represents Defendant, Robert C. Vilt in this case. I am personally familiar with the work my firm, Vilt Law, P.C., has done and the actual time expended thereon through to the date of this affidavit. I am familiar with the attorneys' fees customarily charged by attorneys in Harris County, Texas for handling suits on these types of claims and am familiar with the attorneys' services required for the proper prosecution of suits founded upon similar claims.

4. As of January 16, 2023, I have worked approximately 20 hours on this case at an hourly rate of \$500 for a total of \$10,000 inclusive of the 1 hour charge for attending the related hearing on this Motion. The services that I performed include review and analysis of underlying documents; evolving the case strategy; preparing and revising the pleadings and motion to dismiss; legal research; and other case-related work. Thus, the total fee incurred in defending this lawsuit through the Motion for Summary Judgment and Motion for Sanctions hearing is \$10,000 which is a reasonable fee and all services were necessary in order to expeditiously facilitate resolution of this matter.

5. I am familiar with the factors listed in Rule 1.04 of the Texas Disciplinary Rules of Professional Conduct for determining whether a legal fee is reasonable.


6. Based upon my knowledge of Rule 1.04 and my familiarity with and knowledge of the respective hourly rates charged by attorneys in Harris County for transactional litigation services, in my opinion, my hourly rate is reasonable for attorneys of my background, education, training, and experience.”

I have read the foregoing Affidavit and attest that the information contained therein is true and correct in all respects based upon my personal knowledge.



ROBERT C. VILT

SUBSCRIBED AND SWORN TO BEFORE ME on this the 16th day of January, 2023.



NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

My commission expires: 09-22-2025

