

CAUSE NO. 2022-52190

MAPLE RESIDENTIAL, LTD.,	§	IN THE DISTRICT COURT OF
MYSTIC ENERGY, INC.,	§	
STALLONES HOLDING, INC., AND	§	
TOMBALL GATEWAY, LTD.,	§	
	§	
PLAINTIFFS,	§	
	§	
v.	§	HARRIS COUNTY, T E X A S
	§	
TRICIA LUGO,	§	
	§	
DEFENDANT.	§	113 th JUDICIAL DISTRICTT

PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES

Maple Residential, Ltd. ("Maple"), Mystic Energy, Inc. ("Mystic"), Stallones Holding, Inc. ("SHI") and Tomball Gateway, Ltd. ("Tomball") (collectively "Plaintiffs") file their designation of expert witnesses as follows:

I.

Pursuant to the Texas Rules of Civil Procedure, Plaintiffs designate the expert witnesses as set forth in Exhibit "A".

II.

Plaintiffs reserve the right to supplement this designation with additional designations of expert witnesses pursuant to the Texas Rules of Civil Procedure and the Court's Scheduling Order.

III.

Without conceding their expertise or qualifications to testify at this time, Plaintiffs reserve the right to elicit opinion testimony from experts designated by Defendants.

IV.

Plaintiffs reserve the right to call undesignated rebuttal expert witnesses, whose testimony cannot be reasonably foreseen until the presentation of evidence.

V.

Plaintiffs reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate the same as a consulting expert, who cannot be called by opposing counsel.

VI.

Plaintiffs reserve the right to elicit any expert opinion or lay testimony at the time of trial which would be of benefit to the jury to determine the material issues of fact and which would not violate of any existing court order or the Texas Rules of Civil Procedure.

VII.

Without conceding their expertise or qualifications to testify at this time, Plaintiffs hereby designate adverse parties, potentially adverse parties, and/or all witnesses associated with adverse parties, all parties to this suit, and all experts designated by any party to this suit, even if the designated party is not a party to this suit at the time of trial. In the event a present or future party designates any expert but then is dismissed for any reason from the suit or fails to call any designated expert, Plaintiffs reserve the right to designate and/or call any such party or any such experts previously designated by any party.

Plaintiffs reserve whatever additional rights it may have with regard to experts pursuant to the Texas Rules of Civil Procedure, the Texas Rules of Evidence, the case law construing the same, and the rulings of this Court.

Respectfully submitted,

/s/ Robert J. Kruckemeyer _____

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ATTORNEYS FOR PLAINTIFFS AND
THIRD-PARTY DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record on this _10th day of July, 2023, by certified mail, return receipt requested, facsimile transmission, electronic delivery or hand delivery.

/s/ Robert J. Kruckemeyer _____

Robert J. Kruckemeyer