

CAUSE NO. 2022 52190

MAPLE RESIDENTIAL, LTD., § IN THE DISTRICT COURT  
MYSTIC ENERGY, INC., STALLONES §  
HOLDING, INC., TOMBALL §  
GATEWAYWAY, LTD, AND §  
JEFFEREY STALLONE § 113<sup>th</sup> JUDICIAL DISTRICT  
§  
§  
§  
§  
v. §  
§  
TRICIA LUGO § HARRIS COUNTY, T E X A

**DEFENDANT'S TRICIA LUGO'S DESIGNATION OF EXPERT WITNESSES AND SUPPLEMENTAL RESPONSES TO ALL DEFENDANT PARTIES' DISCLOSURES**

COMES NOW, Defendant, TRICIA LUGO, whom hereby designates the following experts and/or opinion witnesses whom it may call to testify at the trial of this cause:

**I.**

**RETAINED EXPERTS**

No Retained Experts at this time.

**II.**

**NON-RETAINED EXPERTS:**

The following witnesses have not been specifically retained as expert witnesses in this case, but may be called upon to give testimony in the form of opinions within their respective areas of knowledge and expertise:<sup>1</sup>

Shawn M. Mamasis  
MAMASIS & ASSOCIATES, P.C., Shawn M. Mamasis, 12135 Rocky Lake Drive,  
Houston, Texas 77070: Tele: (832) 276-3210: Fax: (281) 547-8991.

Mr. Mamasis will testify as to the reasonable and necessary attorney fees and expenses in this matter. He will also testify as to the normal and customary charges for attorneys regarding civil suits in Harris County, Texas, and other

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<sup>1</sup> Defendant reserves the right to challenge any expert not specifically retained by Plaintiff on the basis of their qualifications, reliability of opinions, and/or relevancy of opinions.  
Defendant, TRICIA LUGO'S  
Designation of Expert Witnesses

contiguous counties, with the facts and basis as that of the case at hand. Mr. Mamasis will testify as to the requirements of, and necessity, of tasks performed in this civil matter, and the reasonable and necessary fees, costs, and expenses involved.

The witnesses identified above are expected to testify concerning the subject of attorney's fees and related issues.

See also curriculum vitae of Shawn M. Mamasis, attached.

### **III.**

#### **CROSS-DESIGNATION OF PLAINTIFFS' EXPERTS**

Defendant, TRICIA LUGO, herein cross designate any of Plaintiff's experts, designated or not.

### **IV.**

#### **CROSS-EXAMINATION**

Defendant reserves the right to elicit, by way of cross-examination, opinion testimony from experts designated and called by other parties to the suit. Defendant may also call, as witness associated with other parties, any expert witness of any party who may be added to this lawsuit.

### **V.**

#### **RIGHT TO WITHDRAW DESIGNATION OF ANY EXPERT**

Defendant reserves 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 to trial and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

### **VI.**

#### **RIGHT TO ELICIT ANY EXPERT OPINION OR LAY OPINION TESTIMONY**

Defendant reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material

issues, of fact, which would not be violative of any existing court order or the Texas Rules of Civil Procedure.

**VII.**  
**DESIGNATION OF ADVERSE PARTIES**

Defendant hereby designates, as adverse parties, potentially adverse parties, and/or as adverse witnesses associated parties, all parties to this suit and all experts designated by any party to this suit, even if the designating party is not a party to the suit at the time of trial. In the event that present or future parties designated an expert, but are subsequently dismissed for any reason from the suit or fail to call any designated expert, Defendant reserves the right to designate and/or call any such party or any such experts previously designated by any party. Defendant designates as adverse experts all other experts designated by any other party, the name, address and telephone number of which is not known at this time.

**IX.**  
**GENERAL CROSS-DESIGNATION**

In addition to the foregoing, Defendant hereby reserves the right to call any one or more of the expert or opinion witnesses properly designated by any other party or litigant in this lawsuit in accordance with the Texas rules of Civil Procedure.

**X.**  
**RESERVATION OF RIGHT TO CALL DEONENTS**

Defendant further reserves the right to call any witness that has testified by way of deposition in this case for the purpose of offering opinion or expert testimony at the trial of this cause.

**XI.**  
**RESERVATION OF RIGHT TO SUPPLEMENT DESIGNATION**

Defendant reserves the right to supplement this designation with additional designations of experts within any time limits imposed by the Court or any alterations of the 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 Civil Evidence.

Respectfully submitted,

MAMASIS & ASSOCIATES, P.C.

By: Shawn M. Mamasis

State Bar No. 15454300  
12135 Rocky Lake Drive  
Houston, Texas 77070  
Ph: (832) 276-3210  
smamasis@sbcglobal.net

ATTORNEYS FOR DEFENDANT  
TRICIA LUGO

**CERTIFICATE OF SERVICE**

On THIS 11th DAY OF July 2023, a true and correct copy of the foregoing instrument was served upon the following in accordance with the Texas Rules of Civil Procedure by one of the means designated below:

<p>Robert Kruckemeyer 244 Malone Street Houston, Texas 77007 Ph: (713) 600-7574 Fax: (713) 600-7579 <a href="mailto:Bob@Kruckemeyerlaw.com">Bob@Kruckemeyerlaw.com</a></p> <p>YETTER COLEMAN, LLP Justin P. Tschoepe 811 Main Street, Suit 4100 Houston, Texas 77002 (713) 632-8000 jtschoepe@yettercoleman.com</p>	<ul style="list-style-type: none"><li><input type="radio"/> CM/RRR</li><li><input type="radio"/> Facsimile</li><li><input type="radio"/> Regular Mail</li><li><input type="radio"/> Certified Mail</li><li><input type="radio"/> Certified Mail RRR</li><li><input type="radio"/> Courier</li><li><input type="radio"/> E-Mail</li><li><input type="radio"/> Hand Delivery</li><li><input checked="" type="radio"/> Electronic Service</li></ul>
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Respectfully submitted,

MAMASIS & ASSOCIATES, P.C.

By: /s/ *Shawn M Mamasis*

Shawn M. Mamasis

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## SHAWN MICHAEL MAMASIS

Licensed Attorney, State of Texas – Bar Number 24041384

Licensed Attorney – U.S. Federal District Courts, Southern District of Texas – Bar Number 57076

### EDUCATION:

**TEXAS SOUTHERN UNIVERSITY, THURGOOD MARSHALL SCHOOL OF LAW, HOUSTON, TEXAS**

Juris Doctorate Degree, May 2003

**Class Rank:** 4<sup>th</sup>

**Academic Honors:** Graduate - Summa Cum Laude  
Deans List 2000 – 2003  
Published Editor, Thurgood Marshall Law Review  
Praemium Excellencia Scholarshjip Awards (AMJUR) –  
Texas Practice, Praemium Excellencia Scholarshjip  
Awards (AMJUR) Comm. Law, Praemium Excellencia  
Scholarshjip Awards (AMJUR) Family Law &  
Domestic Relations

**Activities:** Law School Board of Advocates,  
Moot Court and Mock Trial Coordinator  
Earl Carl Institute for Legal & Social Policy, Inc.

**BOWLING GREEN STATE UNIVERSITY, BOWLING GREEN, OHIO**

Bachelor of Science, Business Administration, May 1987

**Major:** Business Law

**Minor:** Management Information Systems

**Activities:** Phi Delta Theta International Fraternity – President 1985 & 1986  
Inter-Fraternity Council Member – Judicial Board  
Student Government Representative

### EXPERIENCE:

**MAMASIS & ASSOCIATES, P.C. – CYPRESS, HARRIS COUNTY, TEXAS**

PRINCIPAL ATTORNEY

June 2008 - Present

Principal counsel regarding representation of various personal and commercial clients in general litigation of matters concerning prosecution and defense in the insurance, construction, property, contract, corporate management, business, estate, family, wills trusts and estates, and other various legal areas, and dispute of matters, including general counsel for various business forms and corporations.

**GARG & ASSOCIATES, P.C. – THE WOODLANDS, MONTGOMERY COUNTY, TEXAS**

ATTORNEY - OF COUNSEL

November 2007 to 2010

Provide legal representation of firm clients in the litigation of claims and causes of action in the insurance, construction, property, contract, business, estate, and other additional various legal areas. Represented the firm in all general legal matters and disputes.

**DUNN, KACAL, ADAMS, PAPPAS & LAW – GODWIN GRUBER, LLP, - GODWIN, PAPPAS, LANGLEY, RONQUILLO, LLP -**

ASSOCIATE ATTORNEY, HOUSTON, HARRIS COUNTY, TEXAS

December 2003 – June 2008

Providing legal representation primarily in insurance defense matters and individual client defense of legal matters concerning insurance, construction, property, contract, business, estate, and other various legal areas and disputes. Tended to all matters relevant to associate attorney position including handling all client requirement in litigation and negotiations, including, but not limited to: drafting legal memoranda, client management, mediation, participation and placing in firm semi-annual mock trial competitions, and direct involvement in client representation and recruitment.

**164TH CIVIL DISTRICT COURT - HOUSTON, HARRIS COUNTY, TEXAS**

LAW CLERK

April

2002 – December 2003

Providing the Honorable Martha Hill Jamison with case review, document review, and legal memorandum concerning no-evidence and traditional summary judgment motions, expedited foreclosures, default judgments, pro hac vice applications, attorney disciplinary actions, special appearances, court jurisdictional matters, including additional various special projects and general assistance to Court as required.

**TEXAS SOUTHERN UNIVERSITY, THURGOOD MARSHALL SCHOOL OF LAW – HOUSTON, TEXAS**

RESEARCH ASSISTANT

Spring 2001 to Fall 2003

Performed research and writing for professors regarding various legal issues. Completed detailed analysis of Writ of Habeas Corpus and the Anti-Terrorism and Effective Death Penalty Act concerning extensive manuscript to be completed and scheduled for publication. Served as primary Research Assistant to Dean Donald K. Hill, and Judge Ana Otero, concerning composition for publication.

**HARRIS COUNTY DISTRICT ATTORNEY'S OFFICE - HOUSTON, TEXAS**

ASSISTANT DISTRICT ATTORNEY 3

May 2002

to September 2002

Assigned to County Criminal Courts of Law as Assistant District Attorney, misdemeanor division. Controlled daily court dockets, bargained plea agreements, and first and second chair position in trial and motion hearing settings. Fostered integral relationships with various judges, law enforcement officials, and court staff.

**STATE OF TEXAS, FIRST COURT OF APPEALS – HOUSTON, TEXAS**

LEGAL INTERNSHIP

May 2001

to September 2001

Responsible for initial research, writing, and completion of civil and criminal legal memorandum, subsequent submission of draft opinions to three-judge and en banc panels, and the drafting and revision of published and unpublished appellate opinions.

**HARRIS COUNTY PRETRIAL SERVICES AGENCY – HOUSTON, TEXAS**

1998 to 2000

COURT SERVICES – PRETRIAL OFFICER

Supervised and maintained caseload of defendants released on pretrial and surety bond from five felony courts and seven misdemeanor courts. Disseminated confidential personal, employment, and court related information relative for assessment of defendant's detention, bonding and release risk levels, including all additionally necessary motion hearing and trial related testimony.

**TETRAD COMPANY - CLEVELAND, OHIO**

1996 TO 1998

DIRECTOR OF SALES AND ENGINEERING

Performed initial product engineering feasibility and pricing structures for Original Equipment Manufacturing of custom and patented gas appliance products. Recruited, contracted and maintained national and international sales force. Initiated ISO 9000 quality assurance programs including necessary technical manuals concerning various manufacturing, safety, quality, shipping, and costing control systems.

**TOTAL INSURANCE AGENCY GROUP, INC. – CLEVELAND, OHIO**

1988 TO 1996 PERSONAL AND COMMERCIAL LINES ACCOUNT EXECUTIVE

Maintained complete accountability for development, production and service of personal and commercial lines property-casualty, life, health and variable investment products for independent insurance agency. Completed review and servicing of individual commercial and personal accounts customer base. Licensed for sale of property-casualty, life, health, variable annuity and increased risk insurance products.

**WOOD COUNTY PUBLIC DEFENDERS – BOWLING GREEN, OHIO**

1985 to 1987

LAW CLERK / LEGAL ASSISTANT

Aided staff attorneys with investigation, physical evidence gathering, research, client interviews, pleading, case memoranda and trial preparation concerning defense in criminal prosecution of appointed cases from District Courts in Wood County, Ohio.

**A W A R D S & A F F I L I A T I O N S**

State Bar of Texas, Member  
West Outstanding Scholastic Achievement Award  
Houston Area Federal Business Association Scholarship  
Phi Delta Theta Outstanding Presidency Award  
Helen Dawn Williams, Mock Trial Comp. - Third Place  
American Inns of Court – Garland Walker Chapter  
James M. Douglas Board of Advocates - Moot Court Coordinator, Senior Board Member  
Extensive Seminars on Mediation and Conflict Resolution  
Houston Bar Association, Member  
Thurgood Marshall Academic Scholarship  
Phi Alpha Delta Law Fraternity  
State Bar College of Texas – Member  
Neal Speedon Mock Trial – Finalist  
Fun Fair Positive Soccer – Coach 2010 to 2012

Double Dragon Martial Arts Center – Hap Ki Do Instructor and Tae Kwon Do  
tournament coach)  
Hapkido Second Degree Black Belt– Hapkido Federation  
KMA Centers Taekwondo and Hapkido-Assistant Instructor and tournament coach

#### PUBLISHED WORKS

*Fear of the Common Traffic Stop – “Am I Going To Jail?” The Right of Police to Arbitrarily Arrest or Issue Citations for Minor Misdemeanors in Atwater v. City of Lago Vista..* 27 T. MARSHALL L. REV. 84 (2001),

*A Prosecutor’s View: Inconsistent Prosecutorial Theories In Separate Codefendant Trials: Same Corpus of Crime – Different Defendants,* due for completion and publication submission in 2013.

#### INVOLVEMENT/ ACTIVITIES

Earned Black Belt level in Hap Ki Do Martial Arts and Tournament Team Coach for Double Dragon Martial Arts -Tae Kwon Do Team, Cypress Texas.

Director, Defenders Martial Arts Association-MAA, 501c(3) association for the betterment and training of students in martial arts.



## MARTIAL ARTS EXPERIENCE AND TRAINING

Hapkido, self defense, Tae Kwon Do and other martial arts, including, but not limited to Brazilian jui jitsu, Krav Maga, and kickboxing, Muay Thai training from 2008 to the present.

Earned Black Belt level in Hapkido, certified through Korea Hapkido Total Federation, 1st Dan Certificate No. 17010026, February 2, 2017. Earned Second Degree Black Belt under Grandmaster Scon Chol, KMA Hapkido

Presently continuing training for increased experience and further Black Belt Dan levels with Grandmaster Song Chol, KMA Martial Arts Centers, Houston, Texas.

Instructor of Hapkido, Double Dragon Martial Arts, Cypress Texas.

Assistant Instructor Hapkido and Self Defenses, Olympia Tae Kwon Do, Spring Texas, under Grandmaster Bruce Alamdari.

Assistant Martial Arts Instructor, Hapkido, and self-defense training, at Defenders Martial Arts, Tomball, Texas.

AAU Coaching Member, 2008 to present.

AAU Certified tournament Tae Kwon Do coach, 2008 to Present.

Tournament ring judge at World Class Tae Kwon Do Championship, 2015, 2016, 2017, 2018-2021, 2022.

Fostering Martial Arts training and scholarship, and competition as Director, and President of Defenders Martial Arts Association-MAA, an unincorporated 501c(3), and AAU affiliated unincorporated association.

