

No. 2023-22442

SPRING LAKES HOMEOWNERS
ASSOCIATION, INC.

VS.

CHRISTOPHER A. WYATT AND TINA M.
WYATT A/K/A TINA MARIE WYATT

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§
§ IN THE 80TH JUDICIAL DISTRICT COURT
§
§ OF HARRIS COUNTY, TEXAS
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PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

To: Defendants, Christopher A. Wyatt and Tina M. Wyatt a/k/a Tina Marie Wyatt, 406
Spring Lakes Haven, Spring, Texas 77373.

COMES NOW the Plaintiff, Spring Lakes Homeowners Association, Inc., and serves
this, its Designation of Expert Witnesses, as follows:

1. Luke P. Tollett
HoltTollett, P.C.
9821 Katy Freeway, Ste. 350
Houston, Texas 77024
Tel: (713) 510-1000
Fax: (713) 510-1001

Mr. Tollett may be called upon to testify as to reasonable and necessary attorney's
fees incurred by Plaintiff. No documents have been reviewed by Mr. Tollett in
anticipation of his testimony and Mr. Tollett has no opinion at this time as to
Plaintiff's fees. Mr. Tollett does not maintain a resume and bibliography.

2. J.C. Jamison
HoltTollett, P.C.
9821 Katy Freeway, Ste. 350
Houston, Texas 77024
Tel: (713) 510-1000
Fax: (713) 510-1001

Mr. Jamison may be called upon to testify as to reasonable and necessary
attorney's fees incurred by Plaintiff. No documents have been reviewed by Mr.
Jamison in anticipation of his testimony and Mr. Jamison has no opinion at this
time as to Plaintiff's fees. Mr. Jamison does not maintain a resume and
bibliography.

3. David Berk
HoltTollett, P.C.
9821 Katy Freeway, Ste. 350
Houston, Texas 77024
Tel: (713) 510-1000
Fax: (713) 510-1001

Mr. Berk may be called upon to testify as to reasonable and necessary attorney's fees incurred by Plaintiff. No documents have been reviewed by Mr. Berk in anticipation of his testimony and Mr. Berk has no opinion at this time as to Plaintiff's fees. Mr. Berk does not maintain a resume and bibliography.

4. Navin Pillai
HoltTollett, P.C.
9821 Katy Freeway, Ste. 350
Houston, Texas 77024
Tel: (713) 510-1000
Fax: (713) 510-1001

Mr. Pillai may be called upon to testify as to reasonable and necessary attorney's fees incurred by Plaintiff. No documents have been reviewed by Mr. Pillai in anticipation of his testimony and Mr. Pillai has no opinion at this time as to Plaintiff's fees. Mr. Pillai does not maintain a resume and bibliography.

Respectfully submitted,

HOLTTOLLETT, P.C.



J.C. Jamison
State Bar No. 24029632
9821 Katy Freeway, Suite 350
Houston, Texas 77024
Phone No. (713) 510-1000
Fax No. (713) 510-1001
Email: jjamison@holttollett.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all parties of record by certified mail, return receipt requested, on this the 8th day of August, 2023.



J.C. Jamison

CERTIFIED MAIL / RRR
AND FIRST CLASS MAIL

Christopher A. Wyatt
406 Spring Lakes Haven
Spring, Texas 77373

CERTIFIED MAIL / RRR
AND FIRST CLASS MAIL

Tina M. Wyatt a/k/a Tina Marie Wyatt
406 Spring Lakes Haven
Spring, Texas 77373

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§ OF HARRIS COUNTY, TEXAS
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INITIAL DISCLOSURES

To: Defendants, Christopher A. Wyatt and Tina M. Wyatt a/k/a Tina Marie Wyatt, 406 Spring Lakes Haven, Spring, Texas 77373.

COMES NOW the Plaintiff, Spring Lakes Homeowners Association, Inc., (hereinafter the “Plaintiff” or “Association”) and serves this, its Rule 194 and Rule 195 Disclosures, to Defendants Christopher A. Wyatt and Tina M. Wyatt a/k/a Tina Marie Wyatt (hereinafter the “Defendants”).

1. These Disclosures are based upon information now reasonably available to the Plaintiff. The Plaintiff has not completed discovery. Therefore, the information contained in the following disclosures, and any witnesses identified, and documents described, are based solely on information presently available to the Plaintiff. The Plaintiff makes the following disclosures without waiving or prejudicing its right to supplement them with any additional information that may be discovered or determined to be relevant to the subject matter of this action.

2. Each disclosure is made subject to, and without waiving, any and all objections to the production of any document or tangible thing, including but not limited to, objections based on privilege, work product, undue burden, competency, materiality, relevancy, propriety, admissibility, or any other ground that would require the exclusion of the information or

document in any proceeding. Any and all objections and grounds are expressly reserved and may be interposed at any time, up to and including the time of trial.

PLAINTIFF'S RULE 194 DISCLOSURES

Pursuant to Tex. R. Civ. P. 194.2(b):

(1) The correct names of the parties to the lawsuit:

To the best of the Plaintiff's knowledge, the parties are correctly named in the Plaintiff's Original Petition.

(2) The name, address, and telephone number of any potential parties:

At this time, the Plaintiff is unaware of any other potential parties.

(3) The legal theories and, in general, the factual bases of the responding party's claims or defenses.

The Defendants breached properly enacted and duly recorded restrictive covenants imposed on the Defendants' real property. Specifically, the Defendants failed to pay the Association the monies owed from Defendants to the Association for assessments and for related/resulting fees, interest, costs, and charges, including attorneys' fees and costs, as required by the Plaintiff's governing documents and the Texas Property Code.

(4) The amount and any method of calculating economic damages.

As of this date, the Association's damages total seven thousand, five hundred and fifty-seven dollars, and sixty-nine cents (\$7,557.69). This amount includes \$1,793.00 for delinquent assessments; \$813.29 for Association collection fees; \$3,242.00 for attorneys' fees; \$1,255.45 for attorneys' costs; \$403.95 for interest; and, \$50.00 in late charges.

Please note this amount does not include future costs, such as future interest, future attorneys' fees and costs, future late charges, the cost of nonsuiting the instant lawsuit in the event of settlement, and any costs the Association will incur in processing final payment and closing its delinquent account file in the event of settlement. Further, please note that this amount does not include any payments the Defendants may have made but which have not yet been received.

(5) The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

Rose Rodriguez, c/o the undersigned law office. Ms. Rodriguez is the Plaintiff's managing agent.

(6) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses, unless the use would be solely for impeachment.

- Declaration of Covenants, Conditions, and Restrictions for Spring Lakes Homeowners Association, recorded in the Real Property Records of Harris County, Texas, under Clerk's File No. S682068.

(7) Any indemnity and insuring agreements described in Rule 192.3(f).

None.

(8) Any settlement agreements described in Rule 192.3(g).

None.

(9) Any witness statements described in Rule 192.3(h);

None.

(10) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

Not applicable.

(11) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

Not applicable.

(12) The name, address, and telephone number of any person who may be designated as a responsible third party.

Not applicable.

Pursuant to Tex. R. Civ. P. 195.5(a):

J.C. Jamison
HoltTollett, P.C.
9821 Katy Frwy., Suite 350
Houston, Texas 77024

Tel: (713) 510-1000
Fax: (713) 510-1001

Mr. Jamison is an attorney with HoltTollett, P.C., the law firm representing the Plaintiff. Mr. Jamison may be called upon to testify as to reasonable and necessary attorney's fees incurred by Plaintiff. No documents have been reviewed by Mr. Jamison in anticipation of his testimony and Mr. Jamison has no opinion at this time as to Plaintiff's fees. Mr. Jamison does not maintain a resume and bibliography.

Luke Tollett
HoltTollett, P.C.
9821 Katy Frwy., Ste. 350
Houston, Texas 77024
Phone No. (713) 510-1000

Mr. Tollett is an attorney with HoltTollett, P.C., the law firm representing the Plaintiff. Mr. Tollett may be called upon to testify as to reasonable and necessary attorney's fees incurred by Plaintiff. No documents have been reviewed by Mr. Tollett in anticipation of his testimony and Mr. Tollett has no opinion at this time as to Plaintiff's fees. Mr. Tollett does not maintain a resume and bibliography.

David Berk
HoltTollett, P.C.
9821 Katy Frwy., Ste. 350
Houston, Texas 77024
Phone No. (713) 510-1000

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Navin Pillai
HoltTollett, P.C.
9821 Katy Freeway, Ste. 350
Houston, Texas 77024
Houston, Texas 77024
Phone No. (713) 510-1000

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Respectfully submitted,

HOLTTOLLETT, P.C.



J.C. Jamison
State Bar No. 24029632
9821 Katy Freeway, Suite 350
Houston, Texas 77024
Phone No. (713) 510-1000
Fax No. (713) 510-1001
Email: jjamison@holttollett.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all parties of record by certified mail, return receipt requested, on this the 8th day of August, 2023.



J.C. Jamison

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.

Marisela Gomez on behalf of John Jamison

Bar No. 24029632

mgomez@holttollett.com

Envelope ID: 78880588

Filing Code Description: No Fee Documents

Filing Description: PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

Status as of 8/24/2023 1:12 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
J.C. Jamison		jjamison@holttollett.com	8/24/2023 12:57:37 PM	SENT
COURT NOTICE		courtnotice@holttollett.com	8/24/2023 12:57:37 PM	SENT