

CAUSE NO. 2024-83557

DEESHA INVESTMENTS, LLC.  
*Plaintiff,*

v.

MORRELL MASONRY SUPPLY, INC.  
*Defendant.*

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

234th JUDICIAL DISTRICT

**AFFIDAVIT OF NIMRA ALEXIS IN SUPPORT OF ATTORNEYS' FEES**

THE STATE OF TEXAS §  
§  
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Nimra K. Alexis, who being by me duly sworn, upon her oath stated:

1. "My name is Nimra K. Alexis. I am one of the attorneys' for Morrell Masonry Supply, Inc., (hereinafter "Plaintiff" and/or "Morrell"), and as such, I am authorized to make this Affidavit on its behalf. I am more than twenty-one (21) years of age, of sound mind, capable of making this Affidavit, and fully competent to testify to the matters stated herein. I have personal knowledge of the facts, and the circumstances set forth in this Affidavit and they are true and correct.

2. I am engaged in the practice of law at The Cromeens Law Firm, PLLC, 1345 Campbell Rd., Suite 200, Houston, Texas 77055, and I am the associate attorney assisting the lead attorney of record, Ms. Karalynn Cromeens, for Plaintiff in the above-entitled cause number.

3. "I am a graduate of Jones School of Law, Montgomery Alabama, and have been licensed to practice law in the State of Texas since November of 2019. I am a member in good standing of the State Bar of Texas and am qualified to practice before this Court. I am familiar

with the fees charged by attorneys for handling cases of this type in Harris County.

4. “Since on or about 2015, the owner and partner of the the firm, Ms. Karalynn Cromeens, has represented Morrell in its claim against Fariborz Shojai and Contract Developers, Inc., (“Shojai”, “Contract Developers”, and/or collectively “Defendants”) Morrell’s claims involved a foreclosure of a mechanic’s and materialman’s lien and then for fraudulent transfer of deed.

5. “The failure of Defendants to pay Morrell for its materials as agreed to under the final judgment on December 18, 2017 has made it necessary for Morrell to employ the undersigned attorney to file suit to defends itself and further collect the amounts owed. Morrell is entitled to reasonable attorneys’ fees under Chapter 38 of the Texas Civil Practice and Remedies Code and Section 28.005.

6. “I am an associate of The Cromeens Law Firm and in that capacity, supervised other associate attorneys and paralegals who worked with me on this matter. The Partner’s usual and customary fee for legal services tendered in this matter is \$500.00 per hour. Me and the Associate Attorneys assisting me in this matter bill at a rate of \$325.00 to \$425.00 per hour and the Paralegals from \$175.00 to \$230.00 per hour. The total amount of attorneys’ fees billed in this case as of the date of filing is around \$231,753.38, which includes \$83,362.60 from the December 18, 2017 final judgment that remains unpaid.

7. “The service performed included: the noticing and filing of the aforementioned lien; reviewing of the Plaintiff’s documents; the filings of Plaintiff’s petition and motions; multiple attempts at perfecting service; sending a demand letter; and the drafting and submission of Defendant’s Motion for Sanctions with its affidavits in support”.

8. “In arriving at my opinion of the value of reasonable attorneys’ fees in this action, I have utilized and considered the following factors: 1) the time and labor required; 2) the novelty and difficulty of the questions involved; 3) the skill required to perform the legal service properly; 4) the fee customarily charged in the locality for similar legal services; 5) the amount involved; 6) the experience, reputation, and ability of the lawyer or lawyers performing the services; 7) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered; 8) the uncertainty of collection before the legal services have been rendered; and 9) and the results obtained.

9. In my opinion, the total amount of \$231,753.38 is reasonable and necessary attorneys’ fee for the time my firm spent in prosecuting the claims against Plaintiff in this case. I base this conclusion on several factors listed in TEX. R. PROF. CONDUCT 1.04(b). These fees are well within the prevailing rates for the time of attorneys and/or legal assistants in the Houston area for this type of litigation.

10. Further, additional fees of \$15,000.00 are reasonable and necessary in the event that a party prevails on a Motion for New Trial and/or a Bill of Review. Additional attorney’s fees of \$15,000.00 would be reasonable and necessary in event of appeal by Defendant to the Court of Appeals, and \$15,000.00 should Defendant file a Motion for Rehearing or a Petition for Review in the Texas Supreme Court; and an additional \$15,000.00 should the Texas Supreme Court grant any such Petition for Review.

11. The documents are kept by THE CROMEENS LAW FIRM, PLLC, in the regular course of business, and it was in the regular course of business of THE CROMEENS LAW FIRM, PLLC, for an employee or representative of THE CROMEENS LAW FIRM, PLLC, with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to

transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter.

12. Business Records – Tex. R. Evid. 902(10): I am a Managing Partner for The Cromeens Law Firm, P.L.L.C. and counsel for Plaintiff in the above-captioned case, and in such capacity, I am one of the custodians of the books and records pertaining to the case files of The Cromeens Law Firm, P.L.L.C. These documents are kept by The Cromeens Law Firm, P.L.L.C., in the regular course of business, and it was the regular course of business of The Cromeens Law Firm, P.L.L.C., for an employee or representative of The Cromeens Law Firm, P.L.L.C., with knowledge of the act, event, condition, opinion, or diagnosis, recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter or contemporaneously with the event.

13. The records attached to Plaintiff's Motion for Partial Summary Judgment for Attorneys Fees and Costs and Entry of Final Judgment, are the original or exact duplicates of the original and true and correct copies of the original."

"Further, Affiant sayeth not.

/s/ Nimra Alexis  
**NIMRA K. ALEXIS**

**NOTARY PAGE**

THE STATE OF TEXAS

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COUNTY OF HARRIS

Before me, the undersigned Notary Public, on this day personally appeared NIMRA ALEXIS who, being by me duly sworn on oath deposed and said that she is the attorney for Plaintiff in the above-entitled and numbered cause; that she has read the above and foregoing Morrell Masonry Supply, Inc.'s Motion for Sanctions and that every statement contained in the document is within her personal knowledge and is true and correct.

  
NIMRA K. ALEXIS

SWORN TO AND SUBSCRIBED before me by NIMRA K. ALEXIS, on the 6<sup>th</sup> day of February 2025.

  
NOTARY PUBLIC

