

EXHIBIT "A"

No. 2025-18024

EDDIE C. LINDSEY, § IN THE DISTRICT COURT OF
§
Plaintiff, §
§
VS. § HARRIS COUNTY, TEXAS
§
WBL SPO I, LLC and §
WORLD BUSINESS LENDERS, LLC, §
§
Defendants. § 152ND JUDICIAL DISTRICT

ORIGINAL AFFIDAVIT IN SUPPORT OF REASONABLE ATTORNEYS' FEES

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared **JAMES E. CUELLAR**, who, upon being by me first duly sworn, stated as follows:

"My name is JAMES E. CUELLAR and I am the attorney of record for the Defendants. I have been a licensed attorney in the State of Texas since May 6, 1988, and I am employed by the law firm of Wells & Cuellar, P.C., in Houston, Texas. I am familiar with the average and reasonable attorneys' fees charged by attorneys in the Harris County area.

Since March 17, 2025, I have performed the following legal services in defense of Plaintiff's claims against the Defendants. In the following table, I am the only attorney timekeeper ("TK") at my law firm who billed the Defendants for any legal services:

Date	TK	Description of Service	Hours	Amount
03/17/25	JEC	Receipt and analysis of Plaintiff's Bill of Review.	0.50	\$117.50
04/17/25	JEC	Drafting and filing Defendants' Original Answer.	0.80	\$188.00
05/14/25	JEC	Initial drafting of Defendants' Rule 91a Motion to Dismiss.	3.50	\$822.50

05/16/25	JEC	Completing and filing Motion to Dismiss.	2.20	\$517.00
		Out-of-pocket expenses		\$0.00
Total:			7	1645

It is my opinion, based upon my background, training, qualifications, and experience, that a reasonable and necessary, usual and customary, fee for representing Defendants in this cause of action to date is the sum of \$1,645.00. In rendering this opinion, I have considered the following factors:

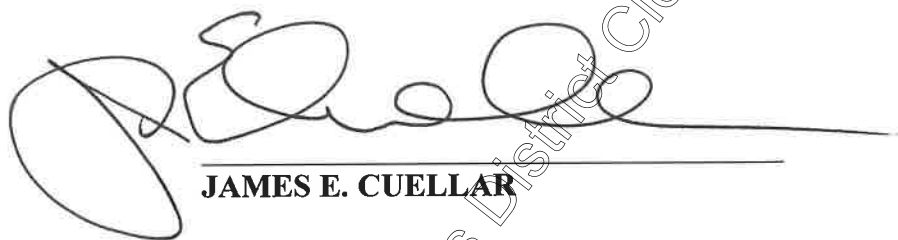
1. the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly;
2. the likelihood that the acceptance of the particular employment will preclude other employment;
3. the fee customarily charged in the locality for similar legal services;
4. the amount involved and the results obtained;
5. the time limitations imposed by the client or by the circumstances;
6. the nature and length of the professional relationship with the client;
7. the experience, reputation, and ability of the attorney providing the services;
8. whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.

In the event that an appeal is perfected to the Court of Appeals in this matter, in my opinion an additional reasonable appellate attorneys' fee for the representation of Defendants in that proceeding is \$5,000.00. In the event a Petition for Review is filed in the Supreme Court of the State of Texas, in my opinion an additional reasonable appellate attorneys' fee for the representation of Defendants in that proceeding is \$5,000.00. In the event such Petition is granted and an appeal is perfected to the Supreme Court of the State of Texas, in my opinion an additional reasonable

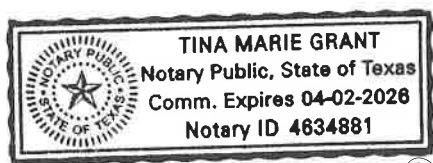
appellate attorneys' fee for the representation of Defendants in that proceeding is \$5,000.00.

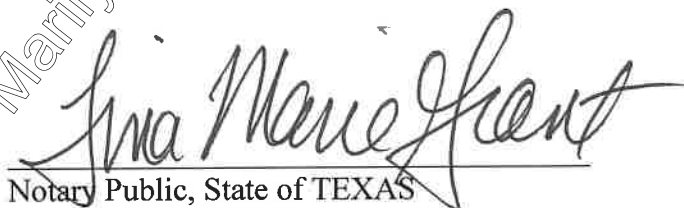
Each and every fact, matter, and opinion stated herein is true and correct within my own personal knowledge.”

FURTHER AFFIANT SAYETH NAUGHT.


JAMES E. CUELLAR

16th day of May, 2025.
SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this




Notary Public, State of TEXAS

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