

April 13, 2022

Via Email: erick@perezlegal.com

Erick Holguin
Perez Law Firm, PLLC
208 Lindberg Ave.
McAllen, Texas 78501

Re: RULE 11 AGREEMENT Dismissal of United Irrigation District from suits on
Parcels 2, 4, 10, 17, 32, 54, 62, 67, 71, 82, 84, 85, 101, 107, 119, 126, 128, 130,
166, 167, 168 and 81.

Dear Mr. Holguin:

The State of Texas and Hidalgo County filed condemnation cases to acquire real property rights for the Parcels identified above. United Irrigation District, owns easement rights in each Parcel and was named as a defendant. Plaintiffs non-suited UID in each of these 22 cases.

Under section 21.019 of the Texas Property Code, a party may be entitled to recover its reasonable and necessary fees for attorneys, appraisers, and photographers, and for the other expenses incurred in these cases to date. UID presented the following expenses:

- Ferris, Flinn & Medina LLC: \$23,586.40
- Law Offices of Glenn Jarvis: \$10,425.00
- Jackson Walker LLP: \$18,711.04

Total: \$52,722.44

Neither party concedes its position regarding the proper application of section 21.019, but to avoid further uncertainty and expense, Plaintiffs have agreed to pay, and UID has agreed to accept \$40,000.00 in full and complete settlement of these claims. If this is consistent with your understanding, please sign below and this will be effective and enforceable as a Rule 11 Agreement.

Regards,



Susan Ayers

SDA/jks

Richard Cortez
Hidalgo County Judge