

2016 Dr. Charalampous created an estate plan that established the Trust. He designated his sons, Conrad and Phillip, as his attorneys-in-fact, beneficiaries of the Trust, and successor trustees.

2017 Following a codicil in 2017, the Trust contained nearly all of Dr. Charalampous' estate, including both Texas and Oklahoma-based assets.

2019-03-xx Dr. Charalampous had a car accident and spent 5 days in hospital. During this hospital stay, Dr. Charalampous was diagnosed with and prescribed medication for dementia.

2021-05-14 Conrad took his father to a psychiatrist, who diagnosed Dr. Charalampous with “moderate dementia, Alzheimer's type” and stated that he was “no longer competent to manage [his] finances[.]”

2022-01-xx Defendant Lee and Dr. Charalampous visited Defendant Stephen Mendel at his office at The Mendel Law Firm for the first time. A few months later, Dr. Charalampous purportedly executed a new estate plan, which contrasted starkly from the plan he had republished via codicil five years earlier.

**2024-01-15 Kanellos D. Charalampous died testate on January 15, 2024**

**USDC, Western District of Oklahoma No. CIV-23-499-R**

**2024-02-06** No. CIV-23-499-R Dismissed

**District Court of McClain County Oklahoma No. PB-2024-19**

**2024-02-09** Constantine Charalampous files father's will for probate

**Harris County Probate Court Cause No. 4 Cause No. 412249-401**

**2024-02-28 Mendel files an alleged [Agreed Emergency Motion to Sell the Elmer H. Brunsting Farm!](#)**

Stephen Mendel filed the allegedly agreed upon order in 412249-401 on February 28, 2024 and showed up the following day attempting to argue his motion.

However, Cause No. 412249-401 is in the 1<sup>st</sup> District Court of Appeal and the “Status Conference” set for February 29, 2024 was in 412249-403 to which neither Mr. Mendel nor his client are a party. The -403 case against the estate planners was filed in the Harris County District Court and then improperly transferred to the probate court without a pending probate. The -403 case has not had a plaintiff since the [Independent Executor resigned February 17, 2015](#).

### **Harris County Probate Court No. W005968**

2024-03-13 Mendel files Charalampous WILLS FOR SAFE KEEPING

2024-03-13 Mendel files Affidavit of Testator

2024-04-19 Mendel files Affidavit to Withdraw Charalampous Will for Safekeeping

2024-05-06 Cause No. 412249-401 Mendel Agreed Motion to Disburse \$26000

2024-05-21 Cause No. 412249-401 Agreed Motion to Disburse \$26000

2024-06-03c Cause No. 412249-401 Brunsting & Wissing R.E. Contract (Sgnd) (4).pdf **This contract violates the injunction**

2024-06-06 1<sup>st</sup> District Court of Appeals Houston No. 01-23-00362-CV\_ORDER DIST LETTER\_FILECOPY

2024-06-06 1<sup>st</sup> District Court of Appeals Houston issues an Order for the Appellees to answer our supplemental brief on Appellate Jurisdiction01-23-00362-CV\_ORDER ISSD 06062024