

Frank Carroll Featured in Law360 About Landmark New Case Law

Case law in Texas has been changed in a major way with the recent ruling by the Texas Supreme Court in *Rohrmoos Venture v. UTSA DVA Healthcare*. The 56-page opinion issued on April 26th clarifies state law on what evidence is required to prove up attorney fees. In the opinion, the court held that “general, conclusory testimony devoid of any real substance will not support a fee award,” and that “billing records are strongly encouraged to prove the reasonableness and necessity of requested fees.”

As the news is making its way through the legal world, news sites have been turning to attorneys to get their perspective on the case. [Law360](#) (behind a paywall) turned to Shareholder Frank Carroll to offer his perspective.

In the article, Frank says “the ruling will likely have a bigger impact on plaintiffs’ attorneys and others who work on a contingent fee or flat fee basis.” He adds, “I think they have put the final nail in the coffin that anything short of contemporaneous billing records is sufficient. People need to avoid the idea that ‘this doesn't apply to me.’” He also cautions everyone to “proceed at your own peril if you don’t follow the mandate of *El Apple*, *City of Laredo* and this case.”

The attorneys of RMWBH will continue stay on top of any changes and developments as this new case is interpreted in the trial and lower appellate courts.