

**FILED**  
At 3:23 o'clock 7 M.  
**NOV 13 2025**  
*Cassandra Tigner*  
Clerk of District Court Brazoria Co., Texas  
BY DEPUTY

Filed for Record  
11/12/2025 12:21 PM  
Cassandra C. Tigner, District Clerk  
Brazoria County, Texas  
131699-CV  
Cathy Richard, Deputy

**CAUSE NO. 131699-CV**

**LILLA Y. (BONNIE) McDONALD**  
**Plaintiff**

**vs.**

**ZOE CROW CORNWELL, et al**  
**Defendants**

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**IN THE DISTRICT COURT**

**149<sup>th</sup> JUDICIAL DISTRICT OF**

**BRAZORIA COUNTY, TEXAS**

**ORDER GRANTING SUSAN ELIZABETH CRISS AND CRISS ROUSSEAU LAW  
FIRM, L.L.P.'S MOTION DETERMINING "VEXATIOUS LITIGANT" STATUS  
REQUIRING POSTING OF BOND**

On November 13, 2025, came on for hearing on both the Motion filed by Defendants, Susan Elizabeth Criss and Criss & Rousseau Law Firm L.L.P. (hereinafter referred to as "Criss" or "Movant") for a formal determination, pursuant to TEX. CIV PRACTICE & REM CODE, Section 11.051, that Plaintiff, Lilla Y. (Bonnie) McDonald ("Plaintiff" or "McDonald") is a "vexatious litigant".

Criss appeared by and through its counsel of record, Robert D. Clements, Jr., and announced ready. McDonald, though served with notice of this hearing via (i) email, (ii) certified mail, return receipt requested, and (iii) through the e-Filing system, did not appear or appeared via Zoom. The Court heard the argument of counsel and plaintiff (if present) and considered the evidence proffered.

The Court, finding that the issues of fact and law, determined adversely to the position of Plaintiff McDonald as a matter of law, in that certain Cause No. PR38444, styled *Estate of Jefferson D. McDonald, Jr.*, adjudicated in the County Court at Law No. 3 of Brazoria County, Texas; Cause Nos. PR38764 and PR38764A, styled *Estate of Robbie Lee McDonald/NexBank SSB v. Zoe Lee Cornwell, et. al.*, adjudicated in County Court at Law No. 3 of Brazoria County, Texas; Cause No. PR0081260, styled *Estate of Lloyd W. Criss Jr.*, adjudicated in Galveston

County Probate Court; Cause No. 104001-CV, styled *Lilla McDonald vs. Zoe Cornwell, et al*, adjudicated in the 412<sup>th</sup> District Court, Brazoria County, Texas (which proceedings are hereinafter referred to as the "Preceding Litigations"), in which proceedings, on the motion of Criss, Judgment denying and/or adjudicating Plaintiff McDonald's claim and all related relief, are the same issues raised by Plaintiff McDonald in the instant case; and, the Court further finds, in light of the pleading, by Criss, of the legal defense of *res judicata*, that there is not a reasonable probability that Plaintiff-McDonald will prevail in the instant litigation against the Defendants Susan Elizabeth Criss and Criss & Rousseau Law Firm L.L.P.

Therefore, as a consequence, this Court FINDS AND DETERMINES that Lilla Y. (Bonnie) McDonald is, in fact, a "vexatious litigant" pursuant to TEX CIV PRACTICE & REM CODE, Section 11.054(2), for the reason that, as a *pro se* litigant in the instant case, and, *after* litigation has been finally determined (and reference is here made to the claims asserted by Plaintiff McDonald in the Preceding Litigations, as detailed above, and the final disposition of those proceedings in all respects favorable to Susan Elizabeth Criss and Criss & Rousseau Law Firm L.L.P.), Plaintiff-McDonald has attempted to relitigate, *pro se*, (A) the validity of the determination against the same defendant as to whom the litigation was finally determined; as well as (B) the cause of action, claim, controversy, or any of the issues of fact or law determined or concluded by the final determination against the same defendant as to whom the litigation was finally determined. It is, therefore, ORDERED, pursuant to of the TEX CIV PRACTICE & REM CODE Section 11.052, that all further litigation activity in the above entitled and numbered cause, be and it is hereby STAYED, pending Plaintiff McDonald's compliance with the requirement, set forth

hereinbelow, that Plaintiff McDonald provide security, pursuant to TEX CIV PRACTICE & REM CODE Section 11.055; it being further,

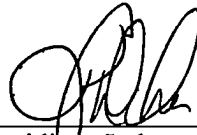
**ORDERED**, pursuant to of the TEX CIV PRACTICE & REM CODE Section 11.055(a), that Plaintiff McDonald is required to post with the Clerk of this Court, and approved by this Court, security for the benefit of the Defendant-Criss, in the amount specified below, and in the form of: (i) a cash bond, (ii) a bond with *commercial* surety, or, (iii) a bond with two (2) *personal* sureties, provided that both sureties also file sworn evidence that both are the owners of non-exempt assets of a value of twice the amount of the bond required; it being further,

**ORDERED** that the amount of security required to be posted by McDonald be \$ 50,000.<sup>00</sup>; it being further,

It is **ORDERED** that Plaintiff Lilla Y. (Bonnie) McDonald is prohibited and enjoined from filing any further litigation against Susan Elizabeth Criss and Criss & Rousseau Law Firm L.L.P. unless she first obtains permission from the appropriate Brazoria County Administrative Judge.

**ORDERED** that, pursuant to TEX. CIV PRACTICE & REM CODE Section 11.055(b), that the security must be furnished on or before the expiration of thirty (30) days from the date of this order.

**SIGNED** on November 13, 2025.



Presiding Judge

APPROVED AS TO FORM AND  
SUBSTANCE, AND ENTRY REQUESTED:

**Robert D. Clements, Jr. Law Group, LLLP**

By: /s/ Robert D. Clements, Jr.

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