



REQUEST FOR DISCLOSURE (e):

The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

RESPONSE:

REQUEST FOR DISCLOSURE (f):

For any testifying expert:

- (1) the expert's name, address, and telephone number;
- (2) the subject matter on which the expert will testify;
- (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information;
- (4) if the expert is retained by, employed by, or otherwise subject to your control:
  - (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - (B) the expert's current resume and bibliography.

RESPONSE:

REQUEST FOR DISCLOSURE (g):

Any discoverable indemnity and insuring agreements described in Rule 192.3(f).

RESPONSE:

REQUEST FOR DISCLOSURE (h):

Any discoverable settlement agreements described in Rule 192.3(g).

RESPONSE:

REQUEST FOR DISCLOSURE (i):

Any discoverable witness statements described in Rule 192.3(h).

RESPONSE:

REQUEST FOR DISCLOSURE (l):

The name, address and telephone number of any person who may be designated as a responsible third party.

RESPONSE:

Respectfully submitted,

/s/ Craig A. Haynes

Craig A. Haynes  
State Bar No. 09284020  
[craig.haynes@tklaw.com](mailto:craig.haynes@tklaw.com)

Rachelle H. Glazer  
State Bar No. 09785900  
[rachelle.glazer@tklaw.com](mailto:rachelle.glazer@tklaw.com)

THOMPSON & KNIGHT LLP  
One Arts Plaza  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
Telephone: (214) 969-1700  
Facsimile: (214) 969-1751

James E. Cousar  
State Bar No. 04898700  
[James.Cousar@tklaw.com](mailto:James.Cousar@tklaw.com)  
THOMPSON & KNIGHT LLP  
98 San Jacinto Blvd., Suite 1900  
Austin, TX 78701  
Telephone: (512) 469-6100  
Facsimile: (512) 469-6180

ATTORNEYS FOR THE BANK OF NEW YORK  
MELLON TRUST COMPANY, N.A., as  
CORPORATE TRUSTEE OF THE TEL  
OFFSHORE TRUST

ANDREWS KURTH KENYON LLP

Georgia L. Lucier  
State Bar No. 24043523

M. Kaylan Dunn  
State Bar No. 24076359

600 Travis, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4177  
Facsimile: (713) 238-7349  
[georgialucier@andrewskurth.com](mailto:georgialucier@andrewskurth.com)  
[kaylandunn@andrewskurth.com](mailto:kaylandunn@andrewskurth.com)

WITHDRAWING ATTORNEYS FOR THE  
BANK OF NEW YORK MELLON TRUST  
COMPANY, N.A., AS CORPORATE TRUSTEE

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 23, 2016, a true and correct copy of the foregoing has been served via email on Ad Litem, counsel for Ad Litem, Albert Speisman, counsel for RNR Production Land and Cattle, and counsel for Individual Trustees Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr. I hereby certify that, on September 23, 2016, all other interested parties in this matter will be served in accordance with the Court's Order Directing Method of Service dated August 23, 2016.

/s/ Rachelle H. Glazer  
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Rachelle H. Glazer