

IN RE: § IN THE PROBATE COURT
§
§ OF
§
TEL OFFSHORE TRUST § TRAVIS COUNTY, TEXAS

**CORPORATE TRUSTEE’S REQUEST FOR DISCLOSURE
TO RNR PRODUCTION LAND AND CATTLE**

TO: RNR Production Land and Cattle, by and through its attorney of record, Shannon H., Ratliff, Ratliff Law Firm, P.L.C., 600 Congress Avenue, Suite 3100, Austin, Texas 78701

Pursuant to Rule 194, you are requested to disclose, within thirty (30) days of service of this request, the information or material described in Rule 194.2 (a – i and l), as follows.

REQUEST FOR DISCLOSURE (a):

The correct names of the parties to the lawsuit.

RESPONSE:

REQUEST FOR DISCLOSURE (b):

The name, address, and telephone number of any potential parties.

RESPONSE:

REQUEST FOR DISCLOSURE (c):

The legal theories and, in general, the factual bases of Respondents’ claims or defenses.

RESPONSE:

REQUEST FOR DISCLOSURE (d):

The amount and any method of calculating economic damages.

RESPONSE:

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

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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
Rachelle H. Glazer