

NO. C-1-PB-14-001245

IN RE: § IN THE PROBATE COURT
§
§ NO. 1 OF
§
TEL OFFSHORE TRUST § TRAVIS COUNTY, TEXAS

**INDIVIDUAL TRUSTEES' FIRST SET OF
INTERROGATORIES TO ALBERT SPEISMAN**

TO: Albert Speisman, Pro-Se Unit-Holder, P.O. Box 637, Highland Park, Illinois 60035,
alspeisman@speismanlaw.com

Pursuant to Rule 197 of the Texas Rules of Civil Procedure, Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr., the Individual Trustees of the TEL Offshore Trust (“Individual Trustees”), hereby serve their First Set of Interrogatories to Defendant Albert Speisman (“Mr. Speisman” or “You”) in the above-referenced matter. Mr. Speisman shall serve his answers, which must be signed under oath, at the offices of Norton Rose Fulbright US LLP, 98 San Jacinto Boulevard, Suite 1100, Austin, Texas 78701, within thirty (30) days after service of the request.

INSTRUCTIONS

1. These Interrogatories are intended to cover all information in Your possession, custody, or control including, without limitation, all information within the possession, custody, or control of any and all of Your attorneys, d/b/a's, agents, or any person or entity acting on Your or their behalf, as well as documents in the possession of third parties who have an obligation to provide information at your request.

2. As used herein, the terms "and" and "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of each Interrogatory all information that might otherwise be construed to be outside the scope of such Interrogatory.

3. The use of the singular form of any word includes the plural and vice versa as necessary to bring within the scope of each Interrogatory all information or documents that might otherwise be construed to be outside the scope of such Interrogatory.

4. These Interrogatories are continuing in nature, and any additional information discovered or identified by you subsequent to the date of your response, up to and including the time of trial, shall be promptly furnished to the undersigned counsel.

DEFINITIONS

1. “**You**,” and “**Your**” refer to Albert Speisman and his representatives, including any account controlled by Mr. Speisman.
2. “**The Trust**” refers to the TEL Offshore Trust.
3. “**Unit**” or “**Units**” refers to the units of beneficial interest in the TEL Offshore Trust. Each Unit is evidenced by a transferable certificate issued by the Corporate Trustee, Bank of New York Mellon Trust Company, N.A.

INTERROGATORIES

INTERROGATORY NO. 1: Please state the total number of Units You currently own.

ANSWER:

INTERROGATORY NO. 2: Please state the total number of Units Your wife currently owns.

ANSWER:

INTERROGATORY NO. 3: With respect to each purchase of Your Units, state the following:

- (a) The date of each such purchase;
- (b) The number of Units purchased;
- (c) The price per Unit paid;
- (d) The total consideration paid for each such purchase; and
- (e) From whom You purchased the Units.

ANSWER:

INTERROGATORY NO. 4: With respect to each purchase of Your wife's Units, state the following:

- (a) The date of each such purchase;
- (b) The number of Units purchased;
- (c) The price per Unit paid;
- (d) The total consideration for each such purchase; and
- (e) From whom Your wife purchased the Units.

ANSWER:

INTERROGATORY NO. 5: With respect to each sale of Your Units, state the following:

- (a) The date of each such sale;
- (b) The number of Units sold;

- (c) The price per Unit received;
- (d) The total consideration for each such sale; and
- (e) To whom You sold the Units.

ANSWER:

INTERROGATORY NO. 6: With respect to each sale of Your wife's Units, state the following:

- (a) The date of each such sale;
- (b) The number of Units sold;
- (c) The price per Unit received;
- (d) The total consideration for each such sale; and
- (e) To whom Your wife sold the Units.

ANSWER:

INTERROGATORY NO. 7: What do You contend to be the current market value on a price per unit basis of the Units that you own?

ANSWER:

INTERROGATORY NO. 8: What is the name on every account that You or Your wife control, directly or indirectly, that owns Units or has owned Units in the past?

ANSWER:

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/s/ Peter Stokes

Paul Trahan (Texas Bar No. 24003075)

paul.trahan@nortonrosefulbright.com

Peter Stokes (Texas Bar No. 24028017)

peter.stokes@nortonrosefulbright.com

98 San Jacinto Boulevard, Suite 1100

Austin, Texas 78701-4255

Telephone: (512) 474-5201

Facsimile: (512) 536-4598

Daniel M. McClure (Texas Bar No. 13427400)

Dan.mcclure@nortonrosefulbright.com

1301 McKinney, Suite 5100

Houston, TX 77010

Telephone: (713) 651-5159

Facsimile: (713) 651-5246

Attorneys for Individual Trustees Gary C. Evans,
Jeffrey S. Swanson, and Thomas H. Owen, JR.

CERTIFICATE OF SERVICE

I hereby certify that, on October 7, 2016, a true and correct copy of the foregoing has been served by mail and email on Albert Speisman and by email on Ad Litem, counsel for Ad Litem, counsel for RNR Production Land and Cattle, and counsel for Bank of New York Mellon Trust Company, N.A. All other interested parties in this matter will be served in accordance with the Court's Order Directing Method of Service of Discovery dated June 9, 2016.

/s/ Peter A. Stokes

Peter A. Stokes