

necessary attorneys' fees and expenses to the Individual Trustees would be equitable and just pursuant to Section 114.064 of the Texas Trust Code.

III. PRAYER FOR RELIEF

WHEREFORE, Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr., as Individual Trustees, pray that Speisman take nothing; that the Individual Trustees be awarded their reasonable attorneys' fees, costs, and expenses, and pre- and post-judgment interest thereon; that the Individual Trustees be discharged with their costs; and that the Individual Trustees recover general relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on November 18, 2016, a true and correct copy of the foregoing has been served via Texas e-filing and email on counsel for Albert and Joyce E. Speisman, Ad Litem, counsel for Ad Litem, counsel for RNR Production Land and Cattle, and counsel for Corporate Trustee, Bank of New York Mellon Trust Company, N.A. I hereby certify that all other interested parties in this matter will be served in accordance with the Court's Order Directing Method of Service dated January 21, 2016.

/s/ Peter Stokes

Peter Stokes