

**CAUSE NO. C-1-PB-14-001245**

**In Re:** § **IN THE PROBATE COURT NO. 1**  
§  
**TEL Offshore Trust** § **OF**  
§  
§ **TRAVIS COUNTY, TEXAS**  
§

**RNR PRODUCTION LAND AND CATTLE'S  
ANSWER TO THE CORPORATE TRUSTEE'S COUNTERCLAIM**

Plaintiff, RNR Production Land and Cattle, files its Answer to Corporate Trustee's Counterclaim and would show the Court as follows:

**I. GENERAL DENIAL**

Plaintiff, RNR Production Land and Cattle, pursuant to Texas Civil Procedure Rule 92, generally denies the material allegations in Corporate Trustee's Counterclaim. The Corporate Trustee, therefore, must prove these allegations to the jury by the greater weight of the believable evidence, as required by the Constitution and the laws of the State of Texas.

Respectfully Submitted,



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ATTORNEYS FOR PLAINTIFF  
RNR PRODUCTION LAND AND CATTLE

**CERTIFICATE OF SERVICE**

I hereby certify that on November 29, 2016, a true and correct copy of the foregoing has been served by mail and email on The Bank of New York Mellon Trust Company, N.A. (“Corporate Trustee”), by and through its attorneys of record, Craig A. Haynes, Rachelle H. Glazer, Thompson & Knight, LLP, One Arts Plaza, 1722 Routh Street, Suite 1500, Dallas, Texas 75201 and James E. Cousar; Thompson & Knight, LLP, 98 San Jacinto Blvd., Suite 1900, Austin, Texas 78701. I hereby certify that, on November 29, 2016, all other interested parties in this matter will be served in accordance with the Court’s Orders Directing Method of Service dated September 28, 2015, January 21, 2016 and June 9, 2016.



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Shannon H. Ratliff