

NO. C-1-PB-14-001245

In Re: § **In the Probate Court No. 1**
§
§ **of**
§
TEL Offshore Trust § **Travis County, Texas**

ATTORNEY AD LITEM'S REQUEST FOR IDENTIFICATION OF MATERIALS AND INFORMATION WITHHELD AS PRIVILEGED

TO: Plaintiffs, The Bank of New York Mellon Trust Company, N. A., Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr., by and through their attorney of record, Georgia L. Lucier, Andrews Kurth LLP, 600 Travis, Suite 4200, Houston, Texas 77002

Pursuant to Tex. R. Civ. P. 193.3 Glenn M. Karisch, as attorney ad litem for certain of the unit holders of TEL Offshore Trust ("Ad Litem") requests that within fifteen days Plaintiffs, The Bank of New York Mellon Trust Company, N. A., Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr. identify all information or materials withheld as privileged in response to Attorney Ad Litem's Request for Production.

Respectfully submitted,

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CERTAIN OF THE UNIT HOLDERS OF TEL
OFFSHORE TRUST**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Attorney Ad Litem’s Notice of Deposition of The Bank Of New York Mellon Trust Company, N.A. has been served on all counsel of record, as indicated below, on this the 15th day of July, 2016.

The following were served by efile and/or email:

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Pursuant to the June 9, 2016 Order Directing Method of Service of Discovery, the following will be served a Notice of Filing by U.S. Mail, once the link to the document at www.andrewsburth.com/teloffshoretrust is available:

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