

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
REQUEST FOR DISCLOSURE TO BANK OF NEW YORK MELLON**

TO: Corporate Trustee Bank of New York Mellon Trust Company, N.A., by and through its attorneys of record, Craig A. Haynes and Rachelle H. Glazer, Thompson & Knight LLP, One Arts Plaza, 1722 Routh St., Suite 1500, Dallas, Texas 75201, and James E. Cousar, Thompson & Knight LLP, 98 San Jacinto Blvd., Suite 1900, 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 this lawsuit.

RESPONSE:

REQUEST FOR DISCLOSURE (b):

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

RESPONSE:

REQUEST FOR DISCLOSURE (c):

The legal theories and, in general, the factual basis of Bank of New York Mellon's claims and or defenses.

RESPONSE:

REQUEST FOR DISCLOSURE (d):

The amount and method of calculating economic damages.

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):

- (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 the control of the responding party, documents reflecting such information;
 - (4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
 - (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 and insuring agreements described in Rule 192.3(f).

RESPONSE:

REQUEST FOR DISCLOSURE (h):

Any settlement agreements described in Rule 192.3(g).

RESPONSE:

REQUEST FOR DISCLOSURE (i):

Any witness statements described in Rule 192.3(h).

RESPONSE:

REQUEST FOR DISCLOSURE (i):

- (1) the name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE:

Dated: November 3, 2016.

Respectfully Submitted,

/s/ Shannon H. Ratliff

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