

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

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

**FIRST AMENDED ANSWER AND COUNTERCLAIM OF DEFENDANT ALBERT  
SPEISMAN AND ORIGINAL ANSWER AND COUNTERCLAIM OF JOYCE E.  
SPEISMAN**

NOW COMES, Defendants Albert Speisman and Joyce E. Speisman and files this, their First Amended Answer and Counterclaim and Original Answer and Counterclaim.

**I. ANSWER**

1. Mr. and Mrs. Speisman (“Speisman Counter-Plaintiffs”) deny generally all of the allegations contained in the Original Petition for Modification and Termination of Trust filed by the Trustees.

**II. COUNTERCLAIM**

2. Speisman Counter-Plaintiffs adopted the Attorney Ad Litem’s answer, counterclaim and motion for summary judgment and incorporate all pleadings filed herein including the Attorney Ad Litem’s.

3. Speisman Counter-Plaintiffs are assignees of people who were served with citations but did not appear as parties in this proceeding.

**III. PRAYER**

4. Speisman Counter-Plaintiffs seek the same relief that the Ad Litem seeks for the parties the Ad Litem represents for their benefit individually.

Respectfully submitted,

/s/R. James George, Jr.

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ATTORNEY FOR  
DEFENDANTS/COUNTERCLAIM  
PLAINTIFFS ALBERT SPEISMAN AND  
JOYCE E. SPEISMAN

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served or will be served in accordance with the Court's orders regarding service dated September 28, 2015 and January 21, 2016.

*/s/R. James George, Jr.*

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