

NO. C-1-PB-14-001245

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

NOTICE OF RULE 11 AGREEMENT

Defendant Glenn M. Karisch (“Ad Litem”), as Attorney Ad Litem representing the interests of the unit holders of TEL Offshore Trust who were served by publication and did not answer or appear files the attached Rule 11 Agreement dated January 5, 2017 between counsel for Ad Litem, counsel for RNR Production Land and Cattle, counsel for Albert and Joyce Speisman and counsel for Defendants, The Bank of New York Mellon Trust Company, N. A., Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr. (“Defendants”) concerning discovery of materials of certain retained experts.

Respectfully submitted,

SCOTT DOUGLASS & McCONNICO, L.L.P.
303 Colorado Street, Suite 2400
Austin, Texas 78701
(512) 495-6300 – Telephone
(512) 495-6399 – Facsimile

By: /s/ Daniel C. Bitting
Daniel C. Bitting
State Bar No. 02362480
Cynthia L. Saiter
State Bar No. 00797367

ATTORNEYS FOR AD LITEM

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/ Daniel C. Bitting
Daniel C. Bitting

January 5, 2017

SENT VIA E-MAIL

Daniel M. McClure
Norton Rose Fulbright US, L.L.P.
Fulbright Tower
1301 McKinney, Suite 5100
Houston, Texas 78701-4255

Shannon Ratliff
Ratliff Law Firm, PLLC
600 Congress Avenue
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Craig Haynes
Thompson & Knight, LLP
1700 Pacific Avenue, Suite 3300
Dallas, Texas 75201-2533

R. James George
114 W. 7th Street
Suite 1100
Austin, Texas 78701

In Re: Cause No. C-1-PB-14-001245; In Re TEL Offshore Trust

Dear Counsel:

This letter will confirm the parties' agreement concerning discovery of materials of certain retained experts. The parties agree that discovery of expert materials of experts retained specially for this litigation will be subject to the limitations in Federal Rule of Civil Procedure 26(b)(4)(B) and (C).

These limitations will not apply to fact witnesses who may also offer expert testimony, such as trustees, auditors, accountants, Chevron representatives, engineers and attorneys who have knowledge that predates any involvement in this litigation.

Please sign below to confirm your agreement. Thank you.

Sincerely,



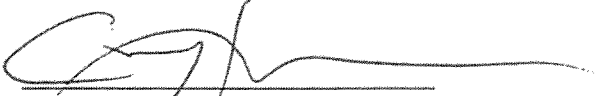
Daniel C. Bitting

DCB:mlp

AGREED:



Paul Trahan
Daniel McClure
Peter Stokes
ATTORNEYS FOR GARY C. EVANS,
JEFFREY S. SWANSON, AND
THOMAS H. OWEN, JR.



Craig Haynes
Rachelle H. Glazer
ATTORNEYS FOR THE BANK OF NEW YORK
MELLON TRUST COMPANY, N.A.

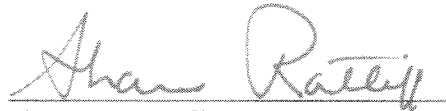
Shannon Ratliff
ATTORNEYS FOR RNR PRODUCTION
LAND AND CATTLE

R. James George
ATTORNEY FOR ALBERT SPEISMAN
AND JOYCE E. SPEISMAN

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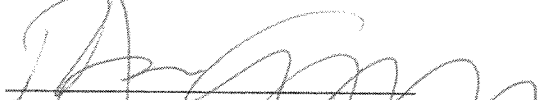
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