

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

IN RE: § IN THE PROBATE COURT
§
§ OF
§
TEL OFFSHORE TRUST § TRAVIS COUNTY, TEXAS

**CORPORATE TRUSTEE’S NOTICE OF DEPOSITION
OF LOIS ANN STANTON**

TO: RNR Production Land and Cattle, by and through their attorney of record, Shannon H. Ratliff, Davis, Gerald & Cremer, PC, 600 Congress Avenue, Suite 3100, Austin, Texas 78701-2984.

Pursuant to Tex. R. Civ. P. 199, Defendant The Bank of New York Mellon Trust Company, N.A. (“BNYM”) as Corporate Trustee (“the Corporate Trustee”), will take the oral deposition of Lois Ann Stanton at the offices of Davis, Gerald & Cremer, PC, located at 600 Congress Avenue, Suite 3100, Austin, Texas 78701-2984, for use in the above-styled and numbered action. The deposition will begin at 9:00 a.m. on March 17, 2017, in the presence of a certified court reporter and will continue from day to day until completed. The deposition may be video recorded.

Pursuant to Tex. R. Civ. P. 30(b)(2) and 45, Lois Ann Stanton is instructed to produce and permit the inspection and copying of the documents identified in the Subpoena Duces Tecum attached as Exhibit A at or before the deposition.

You are invited to attend and cross-examine.

Respectfully submitted,

/s/ Craig A. Haynes

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ATTORNEYS FOR THE BANK OF NEW YORK
MELLON TRUST COMPANY, N.A., as
CORPORATE TRUSTEE OF THE TEL
OFFSHORE TRUST

CERTIFICATE OF SERVICE

I hereby certify that, on February 14, 2017, a true and correct copy of the foregoing has been served via Texas e-filing and email on Ad Litem, counsel for Ad Litem, counsel for Albert and Joyce Speisman, and counsel for RNR Production Land and Cattle. I hereby certify that all other interested parties in this matter will be served in accordance with the Court's Order Directing Method of Service dated January 21, 2016.

/s/ Rachelle H. Glazer
Rachelle H. Glazer

EXHIBIT A
SUBPOENA DUCES TECUM

The Ad Litem's expert witness, Lois Ann Stanton, is requested to produce the following documents at the time of her deposition on March 17, 2017, as follows:

All documents relied upon by her, all documents produced to her or received by her in forming her opinion and conclusions in this case, including her files, correspondence, emails, work product, billings, notes and any reports or other documents she has created in this matter, excluding drafts of any expert report or disclosure and communications between her and counsel for the party who retained her, except to the extent that the communications:

- (i) Relate to compensation for the expert's study or testimony;
- (ii) Identify facts or data that the party's attorney provided and that the expert considered in forming the opinions to be expressed; or
- (iii) Identify assumptions that the party's attorney provided and that the expert relied on in forming the opinions to be expressed.