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 MICHAEL L. WIGGINS

TO: The Unit Holders of the TEL Offshore Trust who were served by publication and did not answer or appear in this proceeding, by and through their Attorney Ad Litem, Glenn M. Karisch, The Karisch Law Firm, PLLC, 301 Congress, Suite 1910, Austin, TX 78701.

Company, N.A. ("BNYM") as Corporate Trustee ("the Corporate Trustee"), will take the oral

Pursuant to Tex. R. Civ. P. 199, Defendant The Bank of New York Mellon Trust

deposition of Michael L. Wiggins at the offices of Scott Douglass & McConnico LLP, 303

Colorado Street, Suite 2400, Austin, TX 78701, for use in the above-styled and numbered

action. The deposition will begin at 9:00 a.m. on March 8, 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, Michael L. Wiggins 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

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, Michael L. Wiggins, Ph.D., P.E., is requested to produce the following documents at the time of his deposition on March 8, 2017, as follows:

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