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ATTORNEYS FOR THE BANK OF NEW YORK  
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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.