

NO. C-1-PB-14-001245

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

UNOPPOSED MOTION FOR CONTINUANCE OF HEARING ON CORPORATE TRUSTEE’S MOTION TO PAY OFF LOAN

Glenn M. Karisch, as Attorney Ad Litem (“Ad Litem”) for the beneficiaries of TEL Offshore Trust who were served by publication and did not answer or appear (“AAL Parties”) and RNR Production Land and Cattle (“RNR”) file this Second Unopposed Motion for Continuance of Hearing on Corporate Trustee’s Motion to Approve Payment of the Trust’s Note Obligation Owed to the Bank of New York Mellon (“Loan Payment Motion”) as follows.

The Loan Payment Motion is currently set for hearing on March 20, 2017 at 9:00 a.m. Ad Litem and RNR have asked to continue the hearing on the Loan Payment Motion to April 5, 2017 at 2:00 p.m., when another hearing is scheduled. The Corporate Trustee agrees to such a continuance, provided that the Loan Payment Motion is heard first on April 5, 2017 to insure that it is reached. Ad Litem and RNR agree to that. Accordingly, Ad Litem and RNR ask that the Court reset the Loan Payment Motion for hearing on April 5, 2017 at 2:00 p.m. and provide that it will be the first motion heard on that day.

Respectfully submitted,

SCOTT DOUGLASS & McCONNICO LLP
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
dbitting@scottdoug.com
Cynthia L. Saiter
State Bar No. 00797367
csaiter@scottdoug.com

Attorneys for Ad Litem

THE KARISCH LAW FIRM, PLLC
301 Congress Avenue, Suite 1910
Austin, TX 78701
(512) 328-6346 (telephone)
(512) 597-4062 (fax)

By: /s/ Glenn M. Karisch
Glenn M. Karisch
State Bar No. 11098950
karisch@texasprobate.com

Attorney Ad Litem

DAVIS GERALD & CREMER
600 Congress Avenue, Suite 3100
Austin, TX 78701
(512) 493-9600 (telephone)
(512) 493-9625 (fax)

By: /s/ Shannon H. Ratliff
Shannon H. Ratliff
State Bar No. 16573000
sratliff@ratliff.com
Lisa A. Paulson
State Bar No. 00784732
lpaulson@ratliff.com

Attorneys for RNR Production Land and Cattle

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record on March 13, 2017 and 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