

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

**IN RE  
TEL OFFSHORE TRUST**

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**IN THE PROBATE COURT NO. 1  
OF  
TRAVIS COUNTY**

**ALBERT SPEISMAN (UNIT-HOLDER) ORIGINAL ANSWER**

**Defendant Albert Speisman files this Original Answer pro-se for the purpose of representing and protecting his interests in this cause.**

**GENERAL DENIAL**

**Defendant Albert Speisman generally denies all of the allegations contained in the Original Petition for Modification and Termination of Trust filed by The Bank of New York Mellon Trust Company, N.A. as corporate trustee, and Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr. as individual trustees (coactively referred to as the "Trustees" and subsequent filings by Plaintiff and demands that the Trustees be required to prove the allegations of the Petition in accordance with law. Albert Speisman, defendant, reserves the right to plead further defenses as the case progresses.**

**PRAYER**

**Defendant Albert Speisman prays that the Court deny all the relief sought in the Petition and deny all other relief requested by Plaintiff, and award Defendant Albert Speisman all costs and expenses incurred by Defendant and award Defendant all other relief to which Defendant Albert Speisman is entitled.**

**Respectfully Submitted,**



**Albert Speisman, Pro-Se Unit-Holder**

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**CERTIFICATE OF SERVICE**

**The undersigned, Albert Speisman, Pro-Se, hereby certifies that on this 12th day of September, 2016, a true and correct copy of this Answer was served as follows**

**Georgia L. Lucier, Esq., Andrews Kurth, LLP, Fax# 713-238-7349**

**Kayla M. Dunn, Esq., Andrews Kurth, LLP, Fax# 713-238-7349**

**Glenn M. Kirsch, Esq., Fax# 512-597-4062**

**Daniel C. Bitting, Esq., Scott Douglass & McConnico LLP Fax# 512-495-6399**

**Cynthia L. Saiter, Esq., Scott Douglass & McConnico LLP Fax# 512-495-6399**

**Shannon H. Ratliff, Esq. Ratliff Law Firm, P.L.L.C., Fax# 512-493-9625**

**James Truss, Esq. Dykema Cox Smith, Fax# 210-226-8395**

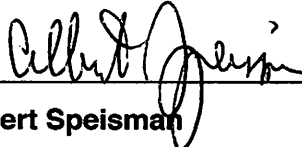
**Pascal Piazza, Esq. Fax# 713-963-9169.**

**Service is also being transmitted by e-file to:**

**Nancy O'Neil, [nnon1@outlook.com](mailto:nnon1@outlook.com)**

**Jessica Siguintes, [jsifuentes@scottdoug.com](mailto:jsifuentes@scottdoug.com)**

**Unit-Holders of Tel Offshore Trust will be served in accordance with the direction of the Court. I have requested a current list of Tel Offshore Trust Unit-Holders from Michael Ulrich of Bank of New York Mellon Trust and am awaiting a current unit-holder list with current addresses. Upon receipt, I will follow the direction of the Court for service of my appearance and answer.**

  
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**Albert Speisman**